

Our proposed Housing and Business Choice Plan Change (14)

Christchurch

City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Jean

Last name:

Turner

Preferred method of contact

Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

Please see the attached pdf for my submissions.

My submission is that:

Please see the attached pdf for my submissions.

Attached Documents

Name
Jean Sub PLAN CHANGE 14 CCC 2023-05-12

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 eliminate the net floor area requirements of these homes, or at least decrease them by at least 33%.

The current requirements do not align with the MDRS, which has no such limitations. The current modifications to the District Plan by CCC are inadequate, and there are no District Plan Objectives that justify the need for the current large net floor area requirements. Quite the opposite, District Plan's Objectives, e.g.

"3.3.4 Objective - Housing bottom lines and choice: 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."

Well-designed homes do not need to be so large, as evidenced by the popularity of Tiny Homes and Transportable Homes, which are smaller than the current requirements but are fully functional and affordable. Thus, the current net floor area requirements do not meet the District Plan's Objectives for a diverse range of housing opportunities. There is a critical shortage of land available for Tiny Homes and Transportable Homes due to outdated restrictions like these. To illustrate, a 24sqm studio unit with all necessary amenities can cost under \$90,000 to build, while a 48sqm unit with 2 large bedrooms and a full bathroom can cost under \$140,000. A 56sqm unit with 3 bedrooms and a generous kitchen can cost under \$160,000. These examples demonstrate that smaller net floor areas are feasible and affordable. The MDRS calls for smaller net floor areas, and there is no valid reason not to allow them. Thus, this aspect of the MDRS should be incorporated into PC14, as it aligns with the CCC District Plan Objectives for a diverse range of housing options.

I seek the following decision from the Council

I WANT CCC To eliminate the net floor area requirements of these homes, or at least decrease them by at least 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 Make it possible for outdoor living spaces to be shared or partially shared with adjacent homes, or allow for a portion of outdoor living areas to be fulfilled by shared greenspaces.

Some younger individuals may not be interested in the upkeep of their own outdoor living space and prefer a larger area that can be shared. This change in housing preferences has led to an interest in larger shared greenspaces, including community gardens, which should be accommodated by updating the District Plan. The District Plan's objectives, specifically

"3.3.4 Objective - Housing bottom lines and choice: 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."

call for a variety of housing opportunities to meet the diverse needs of Christchurch residents. Although not everyone may want this option, enough people do, and the market will balance the demand for it. This is particularly relevant to the MDRS that requires 20 m² of outdoor living space so the CCC has no valid reason not to require more, and should permit shared greenspaces to fulfill any additional requirements. For instance, the 20sqm outdoor living space per dwelling could be mandatory, but any larger outdoor living area requirement could be satisfied by shared outdoor living spaces.

I seek the following decision from the Council

I WANT CCC TO Make it possible for outdoor living spaces to be shared or partially shared with adjacent homes, or allow for a portion of outdoor living areas to be fulfilled 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 am requesting that CCC allow up to three dwellings per 450sqm site as a permitted activity, as long as the dwellings are limited to one storey or a height of 4-5m. This is at least partially in line with the MDRS, and does not introduce a significant negative impact.

The current CCC modifications to their District Plan do not go far enough. In the Residential Suburban Zone I expected to see some alignment with the MDRS but there was nothing.

While three smaller, single-storey dwellings on each site could be seen to take up more room, by reducing the net floor area requirements by ~33% and incorporating shared green spaces, there would be sufficient space.

While the MDRS recommends up to three storeys per site, I believe that allowing only one storey would address concerns about shading and minimize risks associated with higher density. It would also reduce density enough to simplify considerations regarding public transport.

I seek the following decision from the Council

I am requesting that CCC allow up to three dwellings per 450sqm site as a permitted activity, as long as the dwellings are limited to one storey or a height of 4-5m. This is at least partially in line with the MDRS, and does not introduce a significant negative impact.

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 would like the CCC to consider permitting 3 dwellings per 450sqm site, but also limit their building height to a maximum of 5m.

Incorporating some aspects of the MDRS, such as density, into the Residential Suburban Zone and Residential Suburban Density Transition Zones would be feasible if the height limitations were followed to avoid shading issues. Limiting the height to one storey would also ease concerns regarding public transportation and other infrastructure considerations, as there would be less intensification.

The MDRS allows for up to 3 storeys for each site, but I believe that a one-storey dwelling would be more appropriate for this zone as it would not pose significant sunlight shading issues. While I agree with the CCC's approach to being cautious about higher density, it should not reject the entire MDRS, especially since a lower density of one-storey homes would not cause any shading concerns.

I seek the following decision from the Council

I would like the CCC to consider permitting 3 dwellings per 450sqm site, but also limit their building height to a maximum of 5m.

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 Make it possible for outdoor living spaces to be shared or partially shared with adjacent homes, or allow for a portion of outdoor living areas to be fulfilled by shared greenspaces.

Some younger individuals may not be interested in the upkeep of their own outdoor living space and prefer a larger area that can be shared. This change in housing preferences has led to an interest in larger shared greenspaces, including community gardens, which should be accommodated by updating the District Plan. The District Plan's objectives, specifically

"3.3.4 Objective - Housing bottom lines and choice: 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."

call for a variety of housing opportunities to meet the diverse needs of Christchurch residents. Although not everyone may want this option, enough people do, and the market will balance the demand for it. This is particularly relevant to the MDRS that requires 20 m² of outdoor living space so the CCC has no valid reason not to require more, and should permit shared greenspaces to fulfill any additional requirements. For instance, the 20sqm outdoor living space per dwelling could be mandatory, but any larger outdoor living area requirement could be satisfied by shared outdoor living spaces.

I seek the following decision from the Council

I WANT CCC TO Make it possible for outdoor living spaces to be shared or partially shared with adjacent homes, or allow for a portion of outdoor living areas to be fulfilled 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 would like CCC to set the minimum distance between the road boundary and buildings to 1.5m (down from 4.5m), which is the minimum requirement for the MDRS Front yard. This does not affect sunlight as the height at that point is regulated by the recession plane.

The current changes to the CCC's District Plan are insufficient. I had expected to see the Residential Suburban Zone have some alignment with the MDRS, but there was almost none.

The setback of the front yard does not impact shading due to the fact that the height is regulated by the recession plane. The front yard setback does not impact Qualifying Matters such as "Low Public Transport Accessibility Area" or "Tsunami Management Area," among others.

To my understanding, CCC can only decline the MDRS requirements if there is a valid concern. There is no such concern for rejecting the MDRS Front yard minimum of 1.5m.

I seek the following decision from the Council

I would like CCC to set the minimum distance between the road boundary and buildings to 1.5m (down from 4.5m), which is the minimum requirement for the MDRS Front yard. This does not affect sunlight as the height at that point is regulated 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 wish for CCC to allow Qualifying Sites to be in any Residential Suburban area, not only in the Residential Suburban Density Transition (RSDT) zone.

EDMs are already limited to certain locations in 14.13.1.4, which requires them to be close to functional services such as shopping malls, open space zones, core public transport routes, etc. These requirements are more important as they ensure higher functionality for residents.

Therefore, it is unnecessary to further restrict EDMs to be in the RSDT zone as it does not impact the functional services available to residents.

Due to the new requirements of the MRDS to increase density, I believe that the EDMs need to be modified to accommodate the MRDS needs without compromising CCC's qualifying matters. The requested change above does not compromise CCC's qualifying matters, as it still ensures that EDMs are 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 eliminate the net floor area requirements of these homes, or at least decrease them by at least 33%.

The current requirements do not align with the MDRS, which has no such limitations. The current modifications to the District Plan by CCC are inadequate, and there are no District Plan Objectives that justify the need for the current large net floor area requirements. Quite the opposite, District Plan's Objectives, e.g.

"3.3.4 Objective - Housing bottom lines and choice: 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."

Well-designed homes do not need to be so large, as evidenced by the popularity of Tiny Homes and Transportable Homes, which are smaller than the current requirements but are fully functional and affordable. Thus, the current net floor area requirements do not meet the District Plan's Objectives for a diverse range of housing opportunities. There is a critical shortage of land available for Tiny Homes and Transportable Homes due to outdated restrictions like these. To illustrate, a 24sqm studio unit with all necessary amenities can cost under \$90,000 to build, while a 48sqm unit with 2 large bedrooms and a full bathroom can cost under \$140,000. A 56sqm unit with 3 bedrooms and a generous kitchen can cost under \$160,000. These examples demonstrate that smaller net floor areas are feasible and affordable. The MDRS calls for smaller net floor areas, and there is no valid reason not to allow them. Thus, this aspect of the MDRS should be incorporated into PC14, as it aligns with the CCC District Plan Objectives for a diverse range of housing options.

I seek the following decision from the Council

I WANT CCC To eliminate the net floor area requirements of these homes, or at least decrease them by at least 33%.

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 Make it possible for outdoor living spaces to be shared or partially shared with adjacent homes, or allow for a portion of outdoor living areas to be fulfilled by shared greenspaces.

Some younger individuals may not be interested in the upkeep of their own outdoor living space and prefer a larger area that can be shared. This change in housing preferences has led to an interest in

larger shared greenspaces, including community gardens, which should be accommodated by updating the District Plan. The District Plan's objectives, specifically

"3.3.4 Objective - Housing bottom lines and choice: 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."

call for a variety of housing opportunities to meet the diverse needs of Christchurch residents. Although not everyone may want this option, enough people do, and the market will balance the demand for it. This is particularly relevant to the MDRS that requires 20 m² of outdoor living space so the CCC has no valid reason not to require more, and should permit shared greenspaces to fulfill any additional requirements. For instance, the 20sqm outdoor living space per dwelling could be mandatory, but any larger outdoor living area requirement could be satisfied by shared outdoor living spaces.

I seek the following decision from the Council

I WANT CCC TO Make it possible for outdoor living spaces to be shared or partially shared with adjacent homes, or allow for a portion of outdoor living areas to be fulfilled 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 am wanting CCC to remove the Qualifying Matter of "Low Public Transport Accessibility Area" in this region from 100 to 193 Wainoni Road (and beyond), or on all roads that have regular bus stops to the central city. This is because it is simply not an accurate label.

Bus 80 travels down Wainoni Road (in a Residential Suburban Zone), with regular bus stops on both sides of the road. Bus 80 arrives every 15 minutes (such as from 8:18 am to 8:33 am weekdays), from Waimari Beach to the Central City and back (<https://www.metroinfo.co.nz/timetables/80-lincoln-parklands/>). This seems to satisfy the requirement to be near public transportation that connects to the central city.

For contrast:

38 Lyndhurst Crescent, Wainoni (**Medium Density Residential Zone**) to Cathedral Square at 6 pm would take **31 minutes** on Bus 5, with a **12-minute walk**. **No Qualifying Matter for Public Transport**.
183 Wainoni Road, Avondale (**Residential Suburban Zone**) to Cathedral Square at 6 pm would take **25 minutes** on Bus 80, with a **1-minute walk**. Alternatively, it would take 32 minutes on Bus 5, with a 14-minute walk. Yet, this **HAS a Qualifying Matter for Public Transport**.

Therefore, Wainoni and Keyes Roads clearly have regular bus stops to the central city. This label is illogical in relation to PC14 or the stated purpose of Qualifying Matters, and it is unjust 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 am wanting CCC to remove the Qualifying Matter of "Low Public Transport Accessibility Area" in this region from 100 to 193 Wainoni Road (and beyond), or on all roads that have regular bus stops to the central city. This is because it is simply not an accurate label.

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 strongly urge the CCC to rezone the area from 157 to 193 Wainoni Road, and the surrounding area, to "Medium Density Residential Zone".

The current designation of "Residential Suburban Zone" unfairly restricts development opportunities for these properties, especially considering that the Qualifying Matter of "Tsunami Management Area" only applies to a small portion of the northern boundary. This restriction is not in line with the risks posed by other areas, such as Marine Parade, which is designated as a Medium Density Residential Zone despite having the Qualifying Matter of "Tsunami Management Area" across the entire property, and some even have "Coastal Hazard Medium Risk Management Area".

157 to 193 Wainoni Road should be allowed to develop as a Medium Density Residential Zone, as they have less risks than existing Medium Density Residential Zones like Marine Parade and others. It is important to note that public transport is not a valid reason to limit development in this area, as it has comparable or better public transport options than existing Medium Density Residential Zones.

Furthermore, It is clear that 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.

Evidence:

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".

I implore the CCC to consider these factors and rezone this area to allow for much-needed development and growth, while still taking necessary safety measures into account.

I seek the following decision from the Council

I strongly urge the CCC to rezone the area from 157 to 193 Wainoni Road, and the surrounding area, to "Medium Density Residential Zone".

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 request that CCC rezone the area between 135 to 185 Wainoni Road, and beyond, to "Medium Density Residential Zone". This is because other areas like Marine Parade that are already zoned as "Medium Density Residential Zone" have a higher risk factor with the qualifying matter of "Coastal Hazard Medium Risk Management Area" applying to the whole property. More importantly, the current zoning of "Residential Suburban Zone" is not justified due to the qualifying matter of "Water body Setback" only affecting a small 5m wide part of the properties.

The Northern boundary of 135 to 185 Wainoni Road (currently zoned as "Residential Suburban Zone") is adjacent to a small Network Stream. According to the District Plan, this area should have a setback of 5m. The Water body Setback is already protected by the 5m setback from the District Plan, and with good design, it could be used as an outdoor living greenspace, especially in a Medium Density Residential setting.

However, the rest of the property, which is typically around 65m long, is unaffected by this setback. It is not reasonable to restrict the entire property to the "Residential Suburban Zone" when only a small portion is affected.

Additionally, the Water body Setback does not pose a significant flooding risk. In fact, it mitigates flooding risk by draining flood waters away. If there were any flood risk, it would be limited to the low area beside the Network Stream, which would then be designated as a "Floodplain Hazard Management Area," which it is not.

I want to point out that Public Transport is not a valid reason to limit the area between 157 to 193 Wainoni Road. This area has comparable or better Public Transport than existing Medium Density Residential Zones.

I seek the following decision from the Council

I request that CCC rezone the area between 135 to 185 Wainoni Road, and beyond, to "Medium Density Residential Zone". This is because other areas like Marine Parade that are already zoned as "Medium Density Residential Zone" have a higher risk factor with the qualifying matter of "Coastal Hazard Medium Risk Management Area" applying to the whole property. More importantly, the current zoning of "Residential Suburban Zone" is not justified due to the qualifying matter of "Water body Setback" only affecting a small 5m wide part of the properties.

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 rezone area with 800 metres of Pak n Save Wainoni, to “Medium Density Residential Zone” because it is close to all required amenities and passes all EDM tests, with much better results 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 rezone area with 800 metres of Pak n Save Wainoni, to “Medium Density Residential Zone” because it is close to all required amenities and passes all EDM tests, with much better results 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 am wanting CCC to remove the Qualifying Matter of "Low Public Transport Accessibility Area" on all of Keyes Road (and beyond), or on all roads that have regular bus stops to the central city. This is because it is simply not an accurate label.

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:

- [17 Tonks Street, New Brighton \(Medium Density Residential Zone\) to Cathedral Square](#) 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.

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.

Therefore, Wainoni and Keyes Roads clearly have regular bus stops to the central city. This label is illogical in relation to PC14 or the stated purpose of Qualifying Matters, and it is unjust 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 am wanting CCC to remove the Qualifying Matter of "Low Public Transport Accessibility Area" on all of Keyes Road (and beyond), or on all roads that have regular bus stops to the central city. This is because it is simply not an accurate label.

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 request that CCC rezone the Residential Suburban section of Keyes Road to "Medium Density Residential Zone." This is because the "Tsunami Management Area" classification alone is not a sufficient risk factor, especially when compared to areas like Marine Parade and 286 to 388 Keyes Road, which are already classified as "Medium Density Residential Zone" and have both "Tsunami Management Area" and "Coastal Hazard Medium Risk Management Area" qualifications for the entire property.

It should be noted that public transportation should not be used as a reason to restrict development in the 157 to 193 Wainoni Road area. As previously discussed, this region has public transportation that is just as good or better than existing Medium Density Residential Zones.

I seek the following decision from the Council

I request that CCC rezone the Residential Suburban section of Keyes Road to "Medium Density Residential Zone." This is because the "Tsunami Management Area" classification alone is not a sufficient risk factor, especially when compared to areas like Marine Parade and 286 to 388 Keyes Road, which are already classified as "Medium Density Residential Zone" and have both "Tsunami Management Area" and "Coastal Hazard Medium Risk Management Area" qualifications for the entire property.

Our proposed Housing and Business Choice Plan Change (14)

[Submitter Details](#)**Submission Date:** 12/05/2023**First name:** Anita**Last name:** Moir**Preferred method of contact** Email**Consultation Document Submissions****Provision:** Planning Maps**Seek Amendment****I seek the following decision from the Council*****If seeking to make changes to a specific site or sites, please provide the address or identify the area:***

Please see the attached pdf

My submission is that:

Please see the attached pdf

Attached Documents

Name
Submission Plan Change 14 CCC 2023-05-11 Anita

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 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.".

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 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.”.

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 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."

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 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."

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 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."

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:

- [17 Tonks Street, New Brighton \(Medium Density Residential Zone\) to Cathedral Square](#) 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.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Tamsin

Last name: Woods

Preferred method of contact Email

Consultation Document Submissions

Provision: Planning Maps

Seek Amendment

I seek the following decision from the Council


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

attached

My submission is that:

attached

Attached Documents

Name	
Tamsin Sub PC14	

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 would like CCC to eliminate or drastically reduce the net floor area requirements of homes such as minor dwellings.

The current PC14 draft by CCC needs further changes.

The current CCC modifications to their District Plan are inadequate because the current net floor area requirements do not align with the District Plan's objectives, which do not justify such large net floor area requirements. e.g. District Plan's objective:

“3.3.4 Objective - Housing bottom lines and choice: 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.”.

A home does not need to be so large if it is well designed. Tiny homes and many transportable homes are smaller than the current net floor area requirements, yet they are fully functional spaces that are in demand for their affordability and flexibility. Therefore, the current net floor area requirements do not meet the District Plan's objectives, which call for a range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents, including a choice in housing types, densities, and locations. There has been a shift in housing needs, where house affordability has become a critical issue, and smaller homes like tiny homes and transportable homes have become increasingly popular. However, due to outdated restrictions like this, there is a painful shortage of land available for them.

To illustrate, an 8x3m studio unit (24sqm) with a bathroom, kitchen, bedroom area, and living area can cost under \$90,000 to build, including a building consent. A 12x4m unit (48sqm) with two large (3x4m) bedrooms, a full bathroom (including washing machine and dryer), and a spacious kitchen (over 5 lineal meters of kitchen cabinetry) can cost under \$140,000, including a building consent. A 14x4m unit (56sqm) with three bedrooms, including two large (3x4m) ones, a full bathroom (including washing machine and dryer), and a generous kitchen (over 5 lineal meters of kitchen cabinetry) can cost under \$160,000, including a building consent.

The MDRS requests smaller net floor areas, and there is no valid justification for not allowing it. The CCC District Plan Objectives call for this diversity as well, so this aspect of the MDRS (no minimum net floor areas) should be integrated into PC14.

I seek the following decision from the Council

I would like CCC to eliminate or drastically reduce the net floor area requirements of homes such as minor dwellings.

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 individual outdoor living spaces to be smaller in lieu of outdoor living spaces shared or partially shared with neighbouring dwellings.

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 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.”

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. Some “pocket neighbourhoods” or “co-housing” developments even have a shared entertainment area, so that this facility is still available as required.

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. Therefore, It is appreciated that not all people will want this, but that is fine - enough people want it that there should be an option available for it.

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.

Another acceptable solution would be that the 20sqm outdoor living (required in the MDRS) 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 individual outdoor living spaces to be smaller in lieu of outdoor living spaces shared or partially shared with neighbouring dwellings.

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.

Assuming we also had decreased net floor area requirements for these homes (e.g. by 33%), there would be enough space for 3 smaller single storey dwellings per site.

Assuming we also had the option for shared green spaces, there would be plenty of space for 3 smaller single storey dwellings per site.

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.

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 add a provision that IF there are 3 dwellings per 450sqm site (which should also be introduced in combination with this), then they have to reduce building height to a max of 5m.

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).

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.

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 add a provision that IF there are 3 dwellings per 450sqm site, then they have to reduce building height to a max of 5m.

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 individual outdoor living spaces to be smaller in lieu of outdoor living spaces shared or partially shared with neighbouring dwellings.

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 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.”

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. Some “pocket neighbourhoods” or “co-housing” developments even have a shared entertainment area, so that this facility is still available as required.

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. Therefore, It is appreciated that not all people will want this, but that is fine - enough people want it that there should be an option available for it.

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.

Another acceptable solution would be that the 20sqm outdoor living (required in the MDRS) 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 individual outdoor living spaces to be smaller in lieu of outdoor living spaces shared or partially shared with neighbouring dwellings.

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 adopt the MDRS Front yard minimum of 1.5m, replacing the current minimum road boundary building setback of 4.5m.

The current CCC modifications to their District Plan are not sufficient. I had expected to see some alignment with the MDRS in the Residential Suburban Zone, but there was no such provision.

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.

There is no valid matter of concern to reject the MDRS Front yard minimum of 1.5m. As I understand it, CCC can only reject MDRS requirements if there is a valid matter of concern.

I seek the following decision from the Council

I WANT CCC TO adopt the MDRS Front yard minimum of 1.5m, replacing the current minimum road boundary building setback of 4.5m.

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 not just the Residential Suburban Density Transition Zone, but also be ANY Residential Suburban zone.

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.

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.

I seek the following decision from the Council

I WANT CCC TO 1) permit Qualifying Sites to not just the Residential Suburban Density Transition Zone, but also be ANY Residential Suburban 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 would like CCC to eliminate or drastically reduce the net floor area requirements of Enhanced Development Mechanism homes.

The current PC14 draft by CCC needs further changes.

The current CCC modifications to their District Plan are inadequate because the current net floor area requirements do not align with the District Plan's objectives, which do not justify such large net floor area requirements. e.g. District Plan's objective:

“3.3.4 Objective - Housing bottom lines and choice: 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.”.

A home does not need to be so large if it is well designed. Tiny homes and many transportable homes are smaller than the current net floor area requirements, yet they are fully functional spaces that are in demand for their affordability and flexibility. Therefore, the current net floor area requirements do not meet the District Plan's objectives, which call for a range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents, including a choice in housing types, densities, and locations. There has been a shift in housing needs, where house affordability has become a critical issue, and smaller homes like tiny homes and transportable homes have become increasingly popular. However, due to outdated restrictions like this, there is a painful shortage of land available for them.

To illustrate, an 8x3m studio unit (24sqm) with a bathroom, kitchen, bedroom area, and living area can cost under \$90,000 to build, including a building consent. A 12x4m unit (48sqm) with two large (3x4m) bedrooms, a full bathroom (including washing machine and dryer), and a spacious kitchen (over 5 lineal meters of kitchen cabinetry) can cost under \$140,000, including a building consent. A 14x4m unit (56sqm) with three bedrooms, including two large (3x4m) ones, a full bathroom (including washing machine and dryer), and a generous kitchen (over 5 lineal meters of kitchen cabinetry) can cost under \$160,000, including a building consent.

The MDRS requests smaller net floor areas, and there is no valid justification for not allowing it. The CCC District Plan Objectives call for this diversity as well, so this aspect of the MDRS (no minimum net floor areas) should be integrated into PC14.

I seek the following decision from the Council

I would like CCC to eliminate or drastically reduce the net floor area requirements of homes such as minor dwellings.

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 individual outdoor living spaces to be smaller in lieu of outdoor living spaces shared or partially shared with neighbouring dwellings.

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 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.”.

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. Some “pocket neighbourhoods” or “co-housing” developments even have a shared entertainment area, so that this facility is still available as required.

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. Therefore, It is appreciated that not all people will want this, but that is fine - enough people want it that there should be an option available for it.

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.

Another acceptable solution would be that the 20sqm outdoor living (required in the MDRS) 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 individual outdoor living spaces to be smaller in lieu of outdoor living spaces shared or partially shared with neighbouring dwellings.

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 remove the Qualifying Matter of “Low Public Transport Accessibility Area” on all roads on regular bus stops to the central city, including from 100 to 193 Wainoni Road (and further afield).

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.

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”. Evidence given below.

For comparison (click the blue link for the website for proof):

- [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.

For another 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.

I seek the following decision from the Council

I WANT CCC TO 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: “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 rezone this area from 135 to 185 Wainoni Road (and further afield), to “Medium Density Residential Zone” because it 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. Most importantly, the Qualifying Matter of “Water body Setback” only applies to a very small (5m wide) part of the properties, so should not negatively affect the whole 70m of the properties.

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.

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.

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.

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 rezone this area from 135 to 185 Wainoni Road (and further afield), to "Medium Density Residential Zone" because it 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. Most importantly, the Qualifying Matter of "Water body Setback" only applies to a very small (5m wide) part of the properties, so should not negatively affect the whole 70m of the properties.

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 rezone this area from 157 to 193 Wainoni Road (and further afield), to "Medium Density Residential Zone" because this 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. Most importantly, the Qualifying Matter of "Tsunami Management Area" only applies to a very small (5m wide) part of the properties, so should not negatively affect the whole 70m of the properties.

Compare 157 to 193 Wainoni Road (with only a small portion being "Tsunami Management Area") 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".

Evidence:

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".

So there are at least 2 problems with this:

1. 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.
2. 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.

I seek the following decision from the Council

I WANT CCC TO rezone this area from 157 to 193 Wainoni Road (and further afield), to "Medium Density Residential Zone" because this 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. Most importantly, the Qualifying Matter of "Tsunami Management Area" only applies to a very small (5m wide) part of the properties, so should not negatively affect the whole 70m of the properties.

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):

~100 to ~300 Wainoni Road (and further afield) is close to all required amenities - closer than many other areas that are already "Medium Density Residential Zone".

Therefore, I WANT CCC TO rezone this area to "Medium Density Residential Zone".

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 proves that ~100 to ~300 Wainoni Road is close to all required amenities.

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

~100 to ~300 Wainoni Road (and further afield) is close to all required amenities - closer than many other areas that are already “Medium Density Residential Zone”.

Therefore, I WANT CCC TO rezone this area to “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 remove the Qualifying Matter of “Low Public Transport Accessibility Area” on all roads on regular bus stops to the central city, including on all of Keyes Road (and further afield).

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 15 minutes, 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.

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”. Evidence given below.

For comparison:

- [17 Tonks Street, New Brighton \(Medium Density Residential Zone\) to Cathedral Square](#) 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.

For another 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.

I seek the following decision from the Council

I WANT CCC TO remove the Qualifying Matter of “Low Public Transport Accessibility Area” on all roads on regular bus stops to the central city, including on all of Keyes Road (and further afield).

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 “Coastal Hazard Medium Risk Management Area” applying to the whole property and also “Tsunami Management Area”.

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 “Coastal Hazard Medium Risk Management Area” applying to the whole property and also “Tsunami Management Area”.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 15/05/2023

First name: Callum

Last name: Ward

Organisation:

Waihoru Spreydon-Cashmere-Heathcote Community Board

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 6 General Rules and Procedures

Support

I seek the following decision from the Council

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

My submission is that:

1. Proposed Qualifying Matters

The Community Board supports the qualifying matters in the proposal and in particular the following are of local interest in Waihoru Spreydon-Cashmere-Heathcote:

- Matters of national importance (RMA s6) – Outstanding and significant natural features, slope hazard areas, coastal erosion and coastal inundations areas.
- Residential Character areas

Sunlight access

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:

The Board would however like to see the bus frequency shifted from 15 minutes to 30 minutes, because changes to increase bus frequency are relatively easily made, and to some degree this may incentivise provision of more frequent service.

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:

Infrastructure: The Community Board is concerned that infrastructure is suitable for increased density, and support the public transport accessibility restriction, especially across the Port Hills.

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:

There are more points included in this submission. Please see the detailed submission attached.

1. Natural Hazards

The Board supports the need to include high-risk natural hazards as Qualifying Matters. Coastal inundation, coastal erosion and tsunami hazards are all of concern to at least some of the community in Waihoru Spreydon-Cashmere-Heathcote.

Attached Documents

Name	
PC14 WSCH Community Board	

Waihoru Spreydon-Cashmere-Heathcote Community Board

Submission on Christchurch City Council's Proposed Draft Housing and Business Choice Plan Change (PC14)

The Waihoru Spreydon-Cashmere- Heathcote Community Board (The Board) appreciates the opportunity to provide a submission to the Christchurch City Council on the Proposed Housing and Business Choice Plan Change (PC14), and thanks staff for the work done on this matter.

The Board's statutory role is, "to represent, and act as an advocate for, the interests of its community" and "to prepare an annual submission to the territorial authority for expenditure within the community" (Local Government Act 2002, section 52). The Board provides this submission in its capacity as a representative of the communities in the Spreydon-Cashmere-Heathcote area.

Our Community Board Plan's vision is that Spreydon-Cashmere-Heathcote is a place where people are actively engaged and contribute to thriving communities and environments, where they feel they belong and are safe and connected with each other.

The Board understands the need for increased intensification to address a range of issues, not least of which is climate change mitigation. The Board's concern is that intensification does not occur in an ad hoc fashion, but instead takes into account all the social and environmental factors that enables people to continue to enjoy and thrive in their local settings, and considers the proposed plan changes as a key tool for creating a cohesive approach.

1. Proposed Qualifying Matters

The Community Board supports the qualifying matters in the proposal and in particular the following are of local interest in Waihoru Spreydon-Cashmere-Heathcote:

- Matters of national importance (RMA s6) – Outstanding and significant natural features, slope hazard areas, coastal erosion and coastal inundations areas.
- Residential Character areas
- Sunlight access

2. Low public transport accessibility

The Board would however like to see the bus frequency shifted from 15 minutes to 30 minutes, because changes to increase bus frequency are relatively easily made, and to some degree this may incentivise provision of more frequent service.

3. Infrastructure

The Community Board is concerned that infrastructure is suitable for increased density, and support the public transport accessibility restriction, especially across the Port Hills.

4. Natural Hazards

The Board supports the need to include high-risk natural hazards as Qualifying Matters. Coastal inundation, coastal erosion and tsunami hazards are all of concern to at least some of the community in Waihoru Spreydon-Cashmere-Heathcote.

5. Residential Character Areas

The Community Board supports the inclusion of the new character areas in Roker St, Spreydon and Bewdley and Evesham Crescent on Barrington.

6. Trees

The Community Board supports the inclusion of financial contributions for the replacement or new planting of trees, and would like to see the planting happen in the local areas where the intensification development is taking place.

7. Sunlight Access

The Community Board strongly supports the changes regarding sunlight access.

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

Yours sincerely,



Callum Ward

Chairperson, Waihoru Spreydon-Cashmere-Heathcote Community Board

Submitter Details

First name: Stuart

Last name: Pearson

Organisation: Waka Kotahi (NZ Transport Agency)

Preferred method of contact Email

Attached Documents

Name
Waka Kotahi Submission - CCC MDRS - Plan change 14



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 Christchurch Mail Centre
 Christchurch 8011
 New Zealand
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**Submission from Waka Kotahi on the Housing and Business Choice Plan Change 14 by
 Christchurch City Council in response to the National Policy Statement on Urban Development
 2020 and the Resource Management (Enabling Housing Supply and Other Matters) amendment
 Act 2021**

12 May 2023

Christchurch City Council
 PO Box 73012
 Christchurch 8154

Email: engagement@ccc.govt.nz

Name of submitter: The New Zealand Transport Agency (Waka Kotahi)

This is feedback on Christchurch City Council's (**Council**) Plan Change 14 to implement the National Policy Statement on Urban Development 2020 (**NPS-UD**) and the Medium Density Residential Standards (**MDRS**) under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (**HSAA**).

Waka Kotahi role and responsibilities

Waka Kotahi is a Crown Entity established by Section 93 of the Land Transport Management Act 2003 (**LTMA**). The objective of Waka Kotahi is to undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest. Waka Kotahi roles and responsibilities include:

- Managing the State Highway system, including planning, funding, designing, supervising, constructing, maintaining and operating the system.
- Managing funding of the land transport system, including auditing the performance of organisations receiving land transport funding.
- Managing regulatory requirements for transport on land and incidents involving transport on land.
- Issuing guidelines for and monitoring the development of regional land transport plans.

Waka Kotahi interest in this proposal stems from its role as:

- A transport investor to maximise effective, efficient and strategic returns for New Zealand.
- A planner of the land transport network to integrate one effective and resilient network for customers.
- Provider of access to and use of the land transport system to shape smart efficient, safe and responsible transport choices.
- The manager of the State Highway system and its responsibility to deliver efficient, safe and responsible highway solutions for customers.

Government Policy Statement on Land Transport

Waka Kotahi also has a role in giving effect to the Government Policy Statement on Land Transport (GPS). The GPS is required under the LTMA and outlines the Government's strategy to guide land transport investment over the next 10 years. The four strategic priorities of the GPS 2021 are safety, better travel options, climate change and improving freight connections. A key theme of the GPS is integrating land use, transport planning and delivery. Land use planning has a significant impact on transport policy, infrastructure and services provision, and vice versa. Once development has happened, it has a long-term impact on transport. Changes in land use can affect the demand for travel, creating both pressures and opportunities for investment in transport infrastructure and services, or for demand management. For these reasons, Waka Kotahi seeks full utilisation of the tools available to Council to enable development in the most accessible urban areas.

Waka Kotahi view on the Plan Change

Waka Kotahi supports the intent and content of the National Policy Statement on Urban Development (NPS-UD). This Policy Statement recognises the national significance of having well-functioning urban environments that enable people and communities to provide for their social, economic and cultural well-being and for their health and safety. The NPS-UD has a strong focus on ensuring that increased densities are provided in the most accessible parts of urban areas, where communities are able to access jobs, services and recreation by active and public transport modes.

Waka Kotahi also supports the requirements of the HSSA. It seeks the full implementation of these requirements, including the introduction of the Medium Density Residential Standards (MDRS) and related provisions in eligible zones. These standards should only be modified to accommodate qualifying matters and should be modified only to the extent required to accommodate these matters. Qualifying matters must be supported by a strong evidence base to ensure a robust application.

Christchurch City Council is a Tier 1 authority and Waka Kotahi has provided initial feedback during early consultation to the plan change. Waka Kotahi was **generally supportive** of the proposed changes and provisions put forward by the Council, but it is noted that further amendments, including additional qualifying matters, have been included in the proposed plan change as notified.

The view of Waka Kotahi on specific topics are set out in the following paragraphs. These views are supported by the text in Table 1, which outlines the key points of feedback where further clarification or amendments are sought. Waka Kotahi also seeks such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

The application of 'walkable catchment' & application and distribution of densities

Policy 3 of the NPS-UD sets out various requirements in respect of providing for increased densities and heights in the Central City, Metropolitan Centre Zones, and walkable catchments from existing and planned rapid transit stops, the edge of City Centre Zones and the edge of Metropolitan Centre Zones. It also directs councils to amend other residential zones to enable building heights and densities of urban form commensurate with the level of commercial activity and community services in those zones.

Waka Kotahi generally supports the approach of a 200m walkable catchment from the edge of Local Centres (medium), a 400m walkable catchment from the edge of Town Centres and Local Centres (large), and a 600m walkable catchment from the edge of Large Town Centres (Papanui, Hornby and Riccarton). The Centres within a 400 walkable catchment provide for an enabled height of 20m (up to six storeys), while the Large Town Centre enables heights of 20m (up to six storeys) for residential activities and 22m for commercial activities. The Centres within a 200m walkable catchment provide for an enabled height of 14m (up to 4 storeys). It is considered that the density and building heights are appropriate.

However, the extent of the City Centre walkable catchment of 1200m is not sufficient with the level of commercial activity and community services within this centre type. It is recommended that a walkable catchment of 1500m be provided as this will enable the realisation of benefits associated with high densities and will support existing and future public and active transport mode initiatives.

Waka Kotahi considers that Council should take a long-term, enabling view of development of the City Centre that will enable sufficient housing capacity in close proximity to the centre of the South Island's largest city. Increasing the walkable catchment to 1500m can provide for this capacity and it will better utilise the transport system and associated infrastructure. Waka Kotahi also considers that the maximum enabled height of 32m (10 storeys) for residential activities should be applied to the City Centre, rather

than the current proposed approach with two heights (32m in the immediate surrounds, then 20m thereafter).

Assessment of Residential Character Areas

The Council has proposed Residential Character Areas as a qualifying matter, which provides for protection of areas with character values. Some of these areas are highly accessible to active transport modes and public transport, and within walkable catchments of centres. There are also Character Areas proposed in locations that are required by the NPS-UD to enable the most development in these locations. Waka Kotahi does not support the approach taken as it runs counter to the intent of the HSAA and NPS-UD.

The Council proposes to introduce a resource consent requirement as a restricted discretionary activity to protect Residential Character Areas, which provides for a potential pathway to allow some intensification where demolition, the design of a new house or changes to an existing house maintain the requirements for the Residential Character Area. Many of the matters of discretion relate to amenity values within the Residential Character Areas. However, this also allows for the Council to decline a resource consent where this is not met, and the provisions as notified would significantly restrict the ability to utilise the development capacity provided for by the zoning.

Waka Kotahi considers that the extent and nature of Residential Character Area overlays are contrary to the purpose of the NPS-UD, particularly as objective 4 requires that 'New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, including their amenity values', and policy 6 which requires that planning decisions have particular regard to a number of matters including significant changes to an area and that those changes may detract from existing amenity values but such changes are not, in of themselves an adverse effect. The Residential Character Areas do not allow a pathway to develop the site in accordance with the intended outcomes of the HSAA.

Special/residential character is but one aspect of urban development that needs to be carefully weighed up against the benefits of increased densities in these locations, including potential reduction in greenhouse gas emissions and vehicle kilometres travelled. The current s32 evaluations focus primarily on the character and amenity of the specific area. This approach is consistent with a strategic planning approach that considers the benefits and costs of different zoning provisions. Without such an evaluation of other matters that appropriately considers and weighs the extensive benefits of development in such areas, the opportunity cost of retaining Residential Character Areas will not be known.

Waka Kotahi opposes the current approach in relation to including Residential Character Areas as a qualifying matter. It is requested that further consideration is given to removing the Overlay altogether.

Qualifying matters

Waka Kotahi supports the use of qualifying matters where they are appropriate and are focussed to control only to the extent necessary where the level of MDRS intensification may not be appropriate. The Council has included several qualifying matters in addition to the Residential Character Areas that will reduce or limit housing capacity. The following qualifying matters are considered to not currently be suitable for managing housing capacity within Christchurch.

City Spine Transport Corridor

The City Spine Transport Corridor has been included as a qualifying matter, which relates to properties along and adjacent to both Riccarton and Papanui Roads. The intent of this qualifying matter is to ensure there is adequate space along these road corridors to enable amenity related outcomes sought by the draft 'Urban Forest Plan 2023'.

The qualifying matter is associated with rules in both the residential and commercial chapters of the Christchurch District Plan. In the residential chapter it requires that where the city spine corridor is less than 24m wide, then a no build setback of 4m from the road boundary shall apply, with no outdoor living located within 1.5m of this boundary. The commercial chapter requires a 1.5m setback from the road boundary. There is a pathway provided to allow buildings and outdoor living to be within the setback area via a resource consent as a restricted discretionary activity.

The matters of discretion (residential rules 14.15.1.j and commercial rule 15.14.5.3) require consideration of amenity, but also whether it can provide for sufficient opportunity to achieve integrated and multiple land use and infrastructure outcomes. This includes consideration of whether best practice guidelines can be achieved, two traffic lanes, pedestrian, cycle and public transport services; landscape amenity and tree planting; and stormwater retention and treatment facilities, residential street relationships and servicing, and CPTED principles. In addition, it also requires consideration of whether the lesser setback could impede widening of the road reserve through future designation and/or land acquisition.

Waka Kotahi generally supports the integration of land use and transport planning, including future provision of multi modal corridors but questions whether this is the most appropriate method for achieving these aims. Waka Kotahi also considers that this qualifying matter reduces the potential for development capacity along the City Spine Transport Corridor, by requiring consideration of potential road widening through designation and/or land acquisition where there are no confirmed or defined plans.

It is also considered that the City Spine Transport Corridor does not meet the requirements as a qualifying matter in the NPS-UD, as it does not achieve the need to balance the heights, densities and other standards of the MDRS against the need to manage those specific characteristics. Waka Kotahi considers that there are appropriate provisions in the District Plan that already achieve this. Therefore, Waka Kotahi opposes this qualifying matter and seeks that this be deleted.

Low Public Transport Accessibility Area

The Low Public Transport Accessibility Area qualifying matter has been introduced to limit the extent that MDRS would be enabled within Christchurch where residential areas are considered to have poor or limited access to public transport. Plan Change 14 seeks that MDRS only apply to areas where there are high frequency public transport routes and routes that connect commercial centres.

Waka Kotahi does not consider that the approach taken for this qualifying matter is appropriate and does not meet the threshold to be a qualifying matter under s771 in the HSAA. The qualifying matter takes a static approach to a dynamic system. If routes are altered or there is further investment to increase the number of routes and/or frequency of buses, then this would not be recognised within the District Plan and further plan changes would be required to remove the qualifying matter on particular residential properties. By upzoning land and increasing densities as per the HSAA, this would support more public transport opportunities in the future. Waka Kotahi opposes this qualifying matter and seeks that this be deleted.

In addition to above, a brief review of the residential areas that are subject to this qualifying matter was undertaken. It appears that several residential properties have been included within this qualifying matter where in fact they are located along key public transport routes. For example, in Richmond on the eastern side of North Parade, this area has been excluded from the MDRS due to the qualifying matter proposed where the Route 60 and the Orbiter bus routes run along North Parade with bus stops directly outside these properties. These are key routes to connect to the City Centre and to large commercial areas.

Waste Water Constraints Areas Overlay (Vacuum Sewer)

Plan Change 14 seeks to introduce a qualifying matter to restrict development in parts of Shirley, Aranui and Prestons where there are recognised constraints with the vacuum sewer systems. These waste water systems are at capacity and further intensification in these areas could not be supported via this existing infrastructure. An overlay has been included in the district planning maps to identify where these areas are located.

Waka Kotahi is generally comfortable with the approach taken with this qualifying matter given the constraints with the infrastructure. It is noted that the areas subject to this qualifying matter have not been 'down-zoned' and are proposed to be rezoned in accordance with MDRS, which provides for the increased density if any changes are made in the future to this infrastructure. Waka Kotahi supports this approach.

Intensification of the site consistent with the zoning can occur if the new activity or expansion does not discharge waste water to the vacuum sewer system. Where it does discharge to vacuum sewer system this is a restricted discretionary activity with consideration given to the capacity of the sewer system and

effects of the development on the sewer system and adjoining wastewater systems. As long as there is a consenting pathway, which there is as notified, then Waka Kotahi supports this approach.

Safe or Efficient Operation of Nationally Significant Infrastructure (Christchurch Airport)

A qualifying matter has been introduced to restrict intensification of residential properties that are subject to the Air Noise Contour in order to protect the safe or efficient operation of the Christchurch Airport. This is identified on the planning maps as 'Airport Noise Influence Area' overlay. It is noted that the residential properties subject to this qualifying matter have retained their original zoning (Residential Suburban Zone) and have not been updated to a MDRS zone.

Waka Kotahi does not support 'down-zoning' as a response to qualifying matters, as these residential properties should be consistent with the zoning sought by MDRS. The Airport Noise Influence Area overlay, technology or building materials may change overtime, which could reduce the need for restricting residential development. It is recommended that these properties be updated to reflect the MDRS Zoning while remaining subject to this qualifying matter, but provide for a consenting pathway where increased density can occur if they can address effects of noise associated with the operation of the airport.

Noise near state highways

PC 14 does not seek to change the noise provisions for 'sensitive activities near roads and railways' (currently 6.1.7.2.1 of the operative plan). It is also noted that these provisions are subject to a current Plan Change 5E (PC5E). Waka Kotahi made a submission on PC5E and produced evidence largely in support of the amendments to the provisions as the amendments improved clarity of the rule and aligned with Waka Kotahi guidance. The hearing for PC5E occurred in February 2023, and therefore timing wise, the updated provisions as a result of PC5E have not been reflected in PC14. Waka Kotahi is seeking confirmation that the noise chapter will be updated to reflect PC5E once the decision is released and has legal effect. Waka Kotahi supports the noise provisions (as updated by PC5E) remaining in place in PC14 within all zones, including MDRS, as the provisions are design standards to protect the health and amenity of occupants, and do not affect development capacity.

Comments from Waka Kotahi on other matters related to specific policies, objectives and rules not discussed above are included in Table 1 below.

Waka Kotahi thanks Christchurch City Council for the opportunity to make a submission on Plan Change 14. To discuss this submission, please contact Stuart Pearson at the address for service below.

Signature of the person authorised to sign on behalf of the submitter.

Address for service:

Waka Kotahi NZ Transport Agency

PO Box 1479

CHRISTCHURCH 8011

Attention: Stuart Pearson

Phone: (03) 964 2836

Email: stuart.pearson@nzta.govt.nz

Table 1 – Submission points

Point #	Topic	Plan Provision	Support/Support in Part Oppose	Reason for Comment	Change(s) sought
1	Extent of proposed zoning / walkable catchments	Planning Maps	<i>Support in Part</i>	<p>Waka Kotahi supports the use of walkable catchments around key commercial areas and the associated upzoning of these areas. However, the 1200m city centre walkable catchment as proposed is not supported does not reflect the walkable catchment of the city centre or realises the development capacity required by the NPS-UD.</p> <p>It is considered that the extent of the city centre walkable catchment should be at least 1500m for the following reasons:</p> <ul style="list-style-type: none"> • This reflects the s32 Walkability Assessment that outlines that people are generally comfortable to walk for 20min, which relates to approximately 1500m. • Christchurch is flat and relatively central to many residential neighbourhoods where people would typically use active modes of transport to get to the City Centre rather than travelling by private vehicle, which increases the walkability of the city. • As many centres as possible should be up-zoned to the fullest extent possible to provide for local services for people who will be living in the walkable catchments. Enabling additional densities in these areas will also support provision of public transport and active transport infrastructure in the future by concentrating population– Council should take a long term view approach to enabling increased density. • This achieves the objectives of the NPS-UD in creating well-functioning urban environments. 	Increase the walkable catchment and associated upzoning of the city centre to 1500m.
2	Residential Character Zones	Planning Maps / Chapter 14	Oppose	<p>The proposed plan change has included an overlay for Residential Character Areas, of which some of these are in areas that are in close proximity to the city centre or other large centre zones with high density zoning or are nearby to key public transport corridors (Riccarton and Papanui Roads).</p> <p>Waka Kotahi considers that PC14 has not appropriately assessed the benefits of increased density with reduced greenhouse gas emissions and vehicle kilometres travelled against amenity values of the Residential Character Areas, especially in areas that are zoned for high density and located</p>	Undertake further assessment to weigh the benefits of character protection against the wider opportunity costs of development limitations in key areas. Based on the results of this study, reduce the extent of

				<p>in close proximity to alternate modes of transport. Growth should be enabled in areas of Christchurch where they are the most accessible by active and public transport and which best support a well-functioning urban environment. The Residential Character areas also do not recognise or meet objective 4 and policy 6 of the NPS-UD.</p> <p>Waka Kotahi opposes the current widespread approach and associated controls of the Residential Character qualifying matter, as it prevents density in areas where the national direction requires it.</p> <p>Waka Kotahi requests that the areas are both reduced in extent and that the provisions are revised to allow greater levels of development, but the appropriate method may involve a mix of the two approaches.</p>	<p>residential character controls.</p> <p>Provide for residential character by instituting design controls in the overlays which allow for special/residential character to be considered and incorporated in design while enabling levels of development anticipated by the zones.</p> <p>Allow for demolition of existing buildings in residential character areas, potentially with provisions restricting such removals to those where there is a comprehensive development proposal.</p>
3	City Spine Transport Corridor - Qualifying Matter	14.5.2.18 14.6.2.17 14.14.5.3 15.4.2.10 15.5.2.10 15.6.2.11 15.8.2.13 15.10.2.10 15.12.2.13 15.14.5.3	Oppose	<p>Waka Kotahi opposes the use of the City Spine Transport Corridor Qualifying Matter to protect the corridors of Riccarton and Papanui Roads for uncertain future uses of the corridor. Many sections of these roading corridors are areas identified as high density zoning to allow for the greatest level of intensification and if developed as such may provide for improved active and public transport services.</p> <p>Waka Kotahi does not agree with there being barriers or restrictions to enabling landowners from developing their site to its maximum capacity where there is uncertainty on the future use of these corridors. As proposed, if a landowner wishes to build within the 4m setback (where the road reserve is less than 24m wide) then a resource consent is required with</p>	Delete the City Spine Transport Corridor Qualifying Matter.

				<p>consideration of the matters of discretion (14.14.5.3 and 15.14.5.3). These matters of discretion require consideration of potential future use of the transport corridor, which is not primarily related to protecting amenity values.</p> <p>It is recommended that Council delete the qualifying matter in its entirety.</p>	
4	Low Public Transport Accessibility Area – Qualifying Matter	Planning Maps / Chapter 14	Oppose	<p>Waka Kotahi considers that the use of the Low Public Transport Accessibility Area qualifying matter does not achieve the intended outcomes sought by MDRS. The approach doesn't take into account alternative transport options and doesn't consider where job opportunities, education and amenities are located. It also takes a static approach to a system that is dependant on funding to operate these services and has the potential to change overtime as demand changes, where increased density can support increased public transport services.</p> <p>It is also considered that this qualifying matter does not meet the requirements under s77I of the NPS-UD.</p> <p>Waka Kotahi opposes the use of the Low Public Transport Accessibility Area as a qualifying matter and requests that this be deleted.</p>	Delete the Low Public Transport Accessibility Area overlay in the planning maps and reference to this qualifying matter in Chapter 14.
5	Waste Water Constraints Areas Overlay (Vacuum Sewer) – Qualifying Matter	Planning Maps / Chapter 8.9A	Support	<p>The intent of the Waste Water Constraints Areas Overlay (Vacuum Sewers) as a qualifying matter is generally supported. Waka Kotahi recognises the existing constraints of this waste water infrastructure and there is no capacity to support additional housing capacity in the areas where this qualifying matter applies. There is also a potential pathway where alternatives to other adjoining wastewater systems can be obtained to allow for intensification of the site.</p>	Retain as notified.
6	Safe or Efficient Operation of Nationally Significant Infrastructure (Christchurch Airport) – Qualifying Matter	Planning Maps	Support in Part	<p>Waka Kotahi supports the general intent of the qualifying matter to address effects related to noise from aircraft on residential properties, which reflects the noise rules in the District Plan. However, it is considered that the qualifying matter should not result in the downzoning of these residential properties and should be subject to MDRS provisions.</p> <p>It is recommended that the residential properties within the Airport Noise Influence Area overlay be rezoned in accordance</p>	Update the Residential Suburban Zone properties subject to the Airport Noise Influence Area to the appropriate zoning required under the MDRS.

				with MDRS while remaining subject to this qualifying matter, but provide for a consenting pathway where increased density can occur if they can address effects of noise associated with the operation of the airport.	
7	Strategic Direction	Objective 3.3.8	Support	Waka Kotahi supports the proposed objective as it sets out that to achieve a well-integrated pattern of development and infrastructure, a consolidated urban form, and a high quality urban environment that it should have good accessibility for all people, including by way of public or active transport, which is consistent with Policy 1 of the NPS-UD.	Retain as notified.
8	Transport	Policy 7.2.1.2.xi – High Trip Generating Activities	Support in Part	Waka Kotahi supports the intent of this policy as it is seeking that activities that trigger the high trip generating activities thresholds shall incorporate measures to reduce vehicular trips and associated greenhouse gas emissions. However, the s32 assessment supporting the policy is seeking that these high trip generating activities should incorporate measures to provide for alternative modes of transport, which has the potential reduce reliance on private vehicle use, rather than greenhouse gas emissions specifically. The current proposed policy could result in potential assessment of greenhouse gases, which is not the intended outcomes as per the s32 assessment. It is recommended that the policy be amended to reflect provision for alternate modes transport and to delete reference to greenhouse gas emissions.	Amend the policy as follows: xi. incorporate measures to promote opportunities for safe and efficient travel other than by private reduce greenhouse gas emissions from vehicle trips associated with the activity.
9	Transport	Rule 7.4.4.2.7 Pedestrian Access – Matters of Discretion	Support	Waka Kotahi supports the matters of discretion has it appropriately provides for safety, alternative pedestrian access, and to ensure that access is function to allow for cyclists to safely access any private and shared cycle storage areas.	Retain as notified.
10	Residential	Policy 14.2.1.1 Housing Distribution and Density	Support	Waka Kotahi supports that high density development is established in the central city and around commercial centres in existing urban environments where there is access to a range of facilities, services, and public transport.	Retain as notified.
11	Noise near state highways	Rule 6.1.7.2.1	Support	Waka Kotahi supports the noise provisions remaining in place including within the MDRS zones. However, we want to ensure that the provisions of PC5E are carried through as part of this process.	Retain noise provisions as per PC5E.

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date: 15/05/2023

First name: Kate **Last name:** Graham

Organisation: Beca

On behalf of:
Te Tāhuhu o te Mātaranga (Ministry of Education)

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 6 General Rules and Procedures

Seek Amendment

I seek the following decision from the Council

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

My submission is that:

Full submission attached.

Attached Documents

Name
Ministry of Education Submission - Christchurch City Council Proposed Plan Change 14



**Te Tāhuhu o
te Mātauranga**
Ministry of Education

Form 5

Submission on publicly notified proposal for policy statement or plan, change or variation under Clause 6 of Schedule 1, Resource Management Act 1991

To: Christchurch City Council

Name of submitter: Ministry of Education ('the Ministry')

Address for service: C/- Beca Ltd
PO Box 13960
Christchurch 8141

Attention: Sara Hodgson

Phone: 03 366 3521

Email: sara.hodgson@beca.com

This is a submission on the proposed Housing and Business Choice Plan Change 14

Background

The Ministry of Education is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.

The Ministry has responsibility not only for all State schools owned by the Crown, but also those State schools that are not owned by the Crown, such as designated character schools and State integrated schools. For the Crown owned State school this involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing.

The Ministry is a considerable stakeholder in terms of activities that may impact on existing and future educational facilities and assets in the Christchurch district.

The Ministry of Education submission is:

Objective and policies:

The Ministry broadly supports provisions in the PC14 that seek to put in place a framework that will deliver integrated communities that support the concepts of liveable, walkable and connected neighbourhoods. This includes a transport

network that is easy and safe to use for pedestrians and cyclists and is well connected to public transport, shops, schools, employment, open spaces and other amenities.

Schools are an essential piece of social infrastructure that is required to support the wellbeing of local communities. PC14 will enable greater intensification that will require more schools in the future to support that growth. Therefore, the Ministry requests amendments to existing policies to specifically enable and provide for educational facilities in the residential zones. These changes are outlined in Appendix 1 to this submission.

Qualifying Matters:

The Resource Management Act 1991 (RMA) clearly sets out the requirements for how the MDRS should apply to designated sites.

Section 77I of the RMA outlines how territorial authorities can make the MDRS less enabling of development by applying a qualifying matter to the site or activity. Designations are considered a qualifying matter under Section 77I (g) as outlined below:

77I (g) the need to give effect to a designation or heritage order, but only in relation to land that is subject to the designation or heritage order.

The Ministry own all of their designated school sites, excluding State Integrated Schools, and control any proposed development and built form outcomes within the designation. Additionally, if a school is operating then the designation has likely been given effect to. Therefore, applying a qualifying matter to the Ministry's designations is contrary to the clear requirements of Section 77I(g), as it is not necessary in order to ensure that the Ministry's designations are given effect to. Instead, the purported qualifying matter would constrain the Ministry's ability to utilise its designation over time in a manner that is consistent and interfaces well with the surrounding future planned built environment.

Section 77M (6) of the RMA allows the Ministry to rely on the provisions of the relevant residential zone (either an underlying zone or an adjoining zone) that incorporate the MDRS if those provisions are more enabling than conditions included in the designation as outlined below:

77M (5) Subsection (6) applies if a designation for which the Minister of Education is the requiring authority—

(a) is included in the specified territorial authority's district plan; and

(b) the designation applies to land that—

(i) is in a relevant residential zone; or

(ii) adjoins a relevant residential zone.

77M (6) Works undertaken under a designation of the kind referred to in subsection (5) may rely on the provisions of the relevant residential zone that incorporate the density standards in Part 2 of Schedule 3A if those provisions are more lenient than conditions included in the designation.

This provision allows the Ministry to develop their sites to the same standards that are applied to the immediately adjoining residential neighbourhoods. This ensures that schools are able to provide for growth over time and recognises that development on school sites should not be unduly constrained in a manner inconsistent with the existing and future planned built environment in which they are located. Applying the same standards ensures that school development will interface with the anticipated amenity outcomes within the surrounding environment.

Currently under PC14, the Council has identified all designations as a qualifying matter. This may unnecessarily and inappropriately result in section 77M(6) not being available to the Ministry until after the plan change becomes operative. The Ministry therefore requests that the Council confirm that the purported qualifying matter does **not** apply to Ministry of Education designations, such that in the absence of any other qualifying matters applying to Schools, section 77M(6) can immediately be relied upon by the Ministry.

Future school network impacts:

Over time, the changes made through PC14 will result in an increase in residential density within the district. This will require additional capacity in the local school network to cater for this growth. As Christchurch develops, there may also be a need for additional schools throughout the city in the future. Where there is residential intensification development, particularly intensification beyond planned levels, then there is likely to be an increased pressure on those schools roll affected as a consequence. This may result in a need for significant investment in redevelopment or expansion of existing schools within already constrained sites to accommodate the additional growth or require the need for a new site for educational facilities. The Ministry notes that the site constraints or new site availability will likely result in the future built form of educational facilities to differ significantly from the current building design. Given the existing site constraints, the availability of land for potential new sites and the dynamic nature of the community needs, the Ministry needs to have as much flexibility as possible in the use of school sites.

The Ministry understands the Council must meet the requirements under the National Policy Statement on Urban Development 2020 (NPS-UD) to provide development capacity for housing and business. The Ministry also acknowledges that some of the changes proposed in parts of PC14 are required in accordance with the RMA Amendment Act.

Decision sought:

The Ministry is neutral on PC14 in its current form if the following relief and consequential amendments requested can be accepted.

The Ministry's requested relief on PC14 is outlined in **Appendix 1** to this submission. Council proposed text to be added by the plan change is shown as **bold underlined**, deletions as ~~**bold strikeouts**~~, unchanged text is shown as normal or in **bold**, text in **green** font identifies existing terms in Chapter 2, new definition in a proposed rule is **bold green text underlined in black**, text in **blue** indicates links to other provisions, text in **bold red underlined** is that from Schedule 3A of the Resource Management Act and must be included and the Ministry's requested amendments are shown in **red underlined** text.

Given the level of increase in housing provision in Christchurch as a result of the PC14 changes, the Ministry requests regular engagement with Christchurch City Council to keep up to date with the housing typologies being proposed, staging and timing of development so that the potential impact of the plan change on the local school network can be planned for. The key Ministry contact email is resource.Management@education.govt.nz

The Ministry wishes to be heard in support of its submission.



Sara Hodgson
Planner- Beca Ltd
(Consultant to the Ministry of Education)
Date:12 May 2023



**Te Tāhuhu o
te Mātauranga**
Ministry of Education

Appendix 1					
ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought
Chapter 2 – Definitions					
01	Habitable room	<u>Habitable room means any room used for the purposes of teaching or used as a living room, dining room, sitting room, bedroom, office or other room specified in the District Plan to be a similarly occupied room.</u>	Support	The Ministry supports the inclusion of teaching spaces within the habitable spaces definition as proposed as it is consistent with the National Planning Standard.	Retain as drafted
Chapter 3 – Strategic Directions					
02	3.3.7	<p><u>Objective – Well-functioning urban environment</u></p> <p><u>a. 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:</u></p> <p><u>i. Within commercial and residential zones, a distinctive, legible urban form and strong sense of place, expressed through:</u></p>	Support in part	The Ministry requests that explicit provision is given to educational facilities throughout the district to provide for a well-functional urban environment.	<p>Amend as follows:</p> <p><u>Objective – Well-functioning urban environment</u></p> <p><u>a. 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:</u></p>

Appendix 1

ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought
		<p><u>A. Contrasting building clusters within the cityscape and the wider perspective of the Te Poho-o-Tamatea/the Port Hills and Canterbury plains; and</u></p> <p><u>B. Appropriate scale, form and location of buildings when viewed in context of the city's natural environment and significant open spaces, providing for:</u></p> <p style="padding-left: 40px;"><u>I. Larger scale development where it can be visually absorbed within the environment; and</u></p> <p style="padding-left: 40px;"><u>II. Lower heights and design controls for development located in more sensitive environments;</u></p> <p><u>C. The pre-eminence of the city centre built form, supported by enabling the highest buildings;</u></p> <p><u>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;</u></p>			<p><u>i. Within commercial and residential zones, a distinctive, legible urban form and strong sense of place, expressed through:</u></p> <p style="padding-left: 40px;"><u>A. Contrasting building clusters within the cityscape and the wider perspective of the Te Poho-o-Tamatea/the Port Hills and Canterbury plains; and</u></p> <p style="padding-left: 40px;"><u>B. Appropriate scale, form and location of buildings when viewed in context of the city's natural environment and significant open spaces, providing for:</u></p> <p style="padding-left: 80px;"><u>I. Larger scale development where it can be visually absorbed within the environment; and</u></p> <p style="padding-left: 80px;"><u>II. Lower heights and design controls for development located in more sensitive environments;</u></p> <p><u>C. The pre-eminence of the city centre built form, supported by enabling the highest buildings;</u></p> <p><u>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</u></p> <p><u>E. The largest scale and density of development, outside of the city centre, provided within and around town centres, and lessening scale for centres lower in the hierarchy;</u></p>

Appendix 1

ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought
		<p><u>E. The largest scale and density of development, outside of the city centre, provided within and around town centres, and lessening scale for centres lower in the hierarchy;</u></p> <p><u>ii. Development and change over time, including amenity values, in response to the diverse and changing needs of people, communities and future generations;</u></p> <p><u>iii. The cultural traditions and norms of Ngāi Tahu manawhenua; and</u></p> <p><u>iv. The benefits of urban environments that support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.</u></p>			<p><u>ii. Development and change over time, including amenity values, in response to the diverse and changing needs of people, communities and future generations;</u></p> <p><u>iii. The cultural traditions and norms of Ngāi Tahu manawhenua; and</u></p> <p><u>iv. The benefits of urban environments that support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.</u></p> <p><u>v. Provides for educational facilities throughout the districts to support communities and development.</u></p>
03	3.3.7.8	<p>Objective – Urban growth, form and design</p> <p>a. A well-integrated pattern of development and infrastructure, a consolidated urban form, and a high quality urban environment that:</p> <p>i. Is attractive to residents, business and visitors; and</p> <p>ii. Has its areas of special character and amenity value identified and their specifically recognised values appropriately managed; and</p>	Support in part	<p>The Ministry requests that explicit provision is given to educational facilities throughout the district in urban development, to manage the impacts of development on educational facilities, in particular impacts on school capacity.</p> <p>Council has an obligation under the National Policy</p>	<p>Amend as follows:</p> <p>Objective – Urban growth, form and design</p> <p>a. A well-integrated pattern of development and infrastructure, a consolidated urban form, and a high quality urban environment that:</p> <p>i. Is attractive to residents, business and visitors; and</p> <p>ii. Has its areas of special character and amenity value identified and their specifically recognised values appropriately managed; and</p>

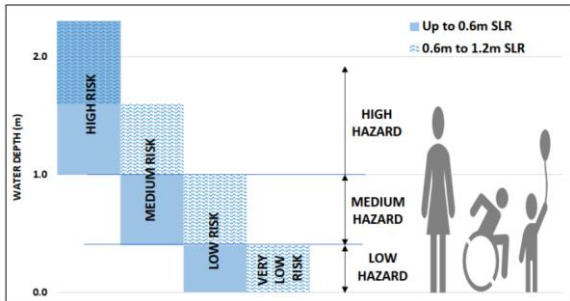
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		<p>iii. Provides for urban activities only:</p> <p>A. within the existing urban areas unless they are otherwise expressly provided for in the CRPS; and</p> <p>B. on greenfield land on the periphery of Christchurch's urban area identified in accordance with the Greenfield Priority Areas in the Canterbury Regional Policy Statement Chapter 6, Map A; and</p> <p>iv. Increases the housing development opportunities in the urban area to meet the intensification targets specified in the Canterbury Regional Policy Statement, Chapter 6, Objective 6.2.2 (1); particularly:</p> <p>A. in and around the Central City, Key Activity Centres (as identified in the Canterbury Regional Policy Statement), Town Centre, and larger Local neighbourhood centres, and nodes of core public transport routes; and</p> <p>B. in those parts of Residential Greenfield Priority Areas identified in Canterbury Regional Policy Statement Chapter 6, Map A; and</p> <p>C. in suitable brownfield areas; and</p>		<p>Statement for Urban Development (NPS-UD) to ensure sufficient additional infrastructure (which includes schools) is provided in urban growth and development (see Policy 10 and 3.5 of Subpart 1 of Part 3: Implementation, in particular). The Ministry would also request consequent consideration of provisions for educational facilities in urban development provisions generally</p>	<p>iii. Provides for urban activities only:</p> <p>A. within the existing urban areas unless they are otherwise expressly provided for in the CRPS; and</p> <p>B. on greenfield land on the periphery of Christchurch's urban area identified in accordance with the Greenfield Priority Areas in the Canterbury Regional Policy Statement Chapter 6, Map A; and</p> <p>iv. Increases the housing development opportunities in the urban area to meet the intensification targets specified in the Canterbury Regional Policy Statement, Chapter 6, Objective 6.2.2 (1); particularly:</p> <p>A. in and around the Central City, Key Activity Centres (as identified in the Canterbury Regional Policy Statement), Town Centre, and larger Local neighbourhood centres, and nodes of core public transport routes; and</p> <p>B. in those parts of Residential Greenfield Priority Areas identified in Canterbury Regional Policy Statement Chapter 6, Map A; and</p> <p>C. in suitable brownfield areas; and</p> <p>v. Maintains and enhances the Central City, Key Activity Centres and Neighbourhood Centres, Town centres, and Local centres as community focal points; and</p>

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		<p>v. Maintains and enhances the Central City, Key Activity Centres and Neighbourhood Centres, Town centres, and Local centres as community focal points; and</p> <p>vi. Identifies opportunities for, and supports, the redevelopment of brownfield sites for residential, business or mixed use activities; and</p> <p>vii. Promotes the re-use and re-development of buildings and land; and</p> <p>viii. Has good Improves overall accessibility and connectivity <u>(including through opportunities for walking, cycling and public transport)</u> for people <u>between housing, jobs, community services, natural spaces, and open space, transport (including opportunities for walking, cycling and public transport) and services</u>; and</p> <p>ix. Promotes the safe, efficient and effective provision and use of infrastructure, including the optimisation of the use of existing infrastructure; and</p> <p>x. Co-ordinates the nature, timing and sequencing of new development with the funding, implementation and operation of necessary transport and other infrastructure</p>			<p>vi. Identifies opportunities for, and supports, the redevelopment of brownfield sites for residential, business or mixed use activities; and</p> <p>vii. Promotes the re-use and re-development of buildings and land; and</p> <p>viii. Has good Improves overall accessibility and connectivity <u>(including through opportunities for walking, cycling and public transport)</u> for people <u>between housing, jobs, community services, natural spaces, educational facilities and open space, transport (including opportunities for walking, cycling and public transport) and services</u>; and</p> <p>ix. Promotes the safe, efficient and effective provision and use of infrastructure, including the optimisation of the use of existing infrastructure; and</p> <p>x. Co-ordinates the nature, timing and sequencing of new development with the funding, implementation and operation of necessary transport and other infrastructure</p> <p><u>xi. Provides for educational facilities throughout the districts to support communities and development.</u></p>

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04	5.2.2.5.1	<p><u>Policy – Managing development in Qualifying Matter Coastal Hazard Management Areas</u></p> <p>a. <u>Within the following Qualifying Matters, development, subdivision and land use that would provide for intensification of any site shall be avoided, unless the risk is from coastal inundation and a site specific assessment demonstrates the risk is low or very low based on thresholds defined in Table 5.2.2.5.1a below:</u></p> <p><u>Coastal Hazard High Risk Management Area;</u></p> <p><u>Coastal Hazard Medium Risk Management Area.</u></p> <p>Table 5.2.2.5.1a thresholds for coastal inundation</p> <table><tr><th>Coastal inundation risk category</th><th>Flood depth based on 0.6m of sea level rise (higher certainty)</th><th>Flood depths based on 1.2m of sea level rise (less certainty – higher consequence)</th></tr><tr><td>Very low</td><td>Dry</td><td>d < 0.4m</td></tr><tr><td>Low</td><td>d < 0.4m</td><td>0.4m < d < 1.0m</td></tr><tr><td>Medium</td><td>0.4m < d < 1.0m</td><td>d > 1.0m</td></tr><tr><td>High</td><td>d > 1.0m</td><td>d> 1.6m</td></tr></table> <p>Note - d represents the depth of coastal flooding in a flood event, which factors in the sea level amount considered i.e. 0.6m of sea level rise does not equate to 0.6m of flooding.</p> 	Coastal inundation risk category	Flood depth based on 0.6m of sea level rise (higher certainty)	Flood depths based on 1.2m of sea level rise (less certainty – higher consequence)	Very low	Dry	d < 0.4m	Low	d < 0.4m	0.4m < d < 1.0m	Medium	0.4m < d < 1.0m	d > 1.0m	High	d > 1.0m	d> 1.6m	Support in part	The Ministry has an operational need to maintain existing, and in some cases establish new educational facilities in Qualifying Matter Coastal Hazard Areas to provide social infrastructure for existing communities in areas susceptible to coastal hazards. The Ministry acknowledges the risk associated with coastal hazards and considers that the policy as drafted enables development and land use with appropriate regard to property and human life.	<p>Amend as follows:</p> <p><u>Policy – Managing development in Qualifying Matter Coastal Hazard Management Areas</u></p> <p>a. <u>Within the following Qualifying Matters, development, subdivision and land use that would provide for intensification of any site shall be avoided, unless the risk is from coastal inundation and a site specific assessment demonstrates the risk is low or very low based on thresholds defined in Table 5.2.2.5.1a below:</u></p> <p><u>Coastal Hazard High Risk Management Area;</u></p> <p><u>Coastal Hazard Medium Risk Management Area.</u></p> <p>Table 5.2.2.5.1a thresholds for coastal inundation</p> <table><tr><th>Coastal inundation risk category</th><th>Flood depth based on 0.6m of sea level rise (higher certainty)</th><th>Flood depths based on 1.2m of sea level rise (less certainty – higher consequence)</th></tr><tr><td>Very low</td><td>Dry</td><td>d < 0.4m</td></tr><tr><td>Low</td><td>d < 0.4m</td><td>0.4m < d < 1.0m</td></tr><tr><td>Medium</td><td>0.4m < d < 1.0m</td><td>d > 1.0m</td></tr><tr><td>High</td><td>d > 1.0m</td><td>d> 1.6m</td></tr></table> <p>Note - d represents the depth of coastal flooding in a flood event, which factors in the sea level amount considered i.e. 0.6m of sea level rise does not equate to 0.6m of flooding.</p>	Coastal inundation risk category	Flood depth based on 0.6m of sea level rise (higher certainty)	Flood depths based on 1.2m of sea level rise (less certainty – higher consequence)	Very low	Dry	d < 0.4m	Low	d < 0.4m	0.4m < d < 1.0m	Medium	0.4m < d < 1.0m	d > 1.0m	High	d > 1.0m	d> 1.6m
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		<p>b. Replacement <u>buildings, accessory buildings and extensions/additions to buildings</u> are enabled where effects are mitigated to an acceptable level based on a <u>site specific assessment</u>, and having regard to the level and timing of the hazard. This could be by use of an <u>appropriate risk based trigger or alternative methods</u>.</p>			<p>b. Replacement <u>buildings, accessory buildings and extensions/additions to buildings</u> are enabled where effects are mitigated to an acceptable level based on a <u>site specific assessment</u>, and having regard to the level and timing of the hazard. This could be by use of an <u>appropriate risk based trigger or alternative methods</u>.</p> <p>c. <u>Educational facilities are enabled, where there is an operational need and effects are mitigated to an acceptable level based on a site specific assessment, and having regard to the level and timing of the hazard. This could be by use of an appropriate risk based trigger or alternative methods.</u></p>
05	<u>5.2.2.5.2</u>	<p><u>Policy – Managing development within Qualifying Matter Tsunami Management Area</u></p> <p>a. <u>Within the Tsunami Management Area Qualifying Matter, avoid development, subdivision and land use that would provide for intensification of any site, unless the risk to life and property is acceptable.</u></p>	Neutral	The Ministry has an operational need to maintain existing, and in some cases establish new educational facilities in Qualifying Matter Tsunami Management Area to provide social	Retain as drafted.

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				infrastructure for existing communities in areas. The Ministry accepts that such facilities should not be provided for if the risk to life and property is considered unacceptable.	
06	<u>5.4A.2</u>	<p><u>Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area</u></p> <p><u>5.4A.2 Controlled activities</u></p> <p><u>a. The activities listed below are controlled activities.</u></p> <p>a. <u>mitigation of the potential adverse effects from coastal hazards.</u></p> <p>b. <u>Setting of minimum floor levels to mitigate the effects of inundation.</u></p> <p>c. <u>There is adequate provision for the timely relocation or removal of buildings and structures, or cessation of activity, and remediation of the site, and mechanisms to ensure this occurs, if considered necessary due to the level of risk.</u></p>	Support	<p>The Ministry recognises the risk that natural hazards pose to school age children and supports methods to ensure new developments have measures in place to mitigate the risk of coastal inundation.</p> <p>A number of schools are located within the Coastal Hazard Management Area including New Brighton South, Redcliffs School, New Brighton Catholic School, Our Lady Star of the Sea, Sumner School, Ko Taku Reo – Deaf Education New Zealand.</p>	Retain as drafted.

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07	5.4A.3	<p><u>Restricted discretionary activities</u></p> <p>a. <u>The activities listed below are restricted discretionary activities.</u></p> <p><u>Activity</u></p> <p>a. <u>The construction of replacement buildings, accessory buildings, and extensions/additions to existing buildings located in the area shown on the planning maps as Qualifying Matter Coastal Hazard High Risk Management Area.</u></p> <p>b. <u>The construction of accessory buildings and extensions/additions to existing buildings located in the area shown on the planning maps as Qualifying Matter Coastal Hazard Medium Risk Management Area.</u></p> <p><u>The Council's discretion shall be restricted to the following matters:</u></p> <p>a. <u>Whether the development or use of the site can adequately mitigate the adverse effects of coastal hazards on people, property, infrastructure and the environment.</u></p> <p>b. <u>Whether the number and size of buildings and structures, siting of buildings and structures, design, and building materials are appropriate for the site considering the risk of coastal hazards, and provide appropriate mitigation to the potential adverse effects from coastal hazards.</u></p> <p>c. <u>Whether the proposed floor levels will mitigate the effects of inundation including with sea level rise.</u></p>	Support	<p>The Ministry recognises the risk that natural hazards pose to school age children and supports measures to ensure new developments have methods in place to mitigate the risk of coastal inundation.</p> <p>A number of schools are located within the Coastal Hazard Management Area including New Brighton South, Redcliffs School, New Brighton Catholic School, Our Lady Star of the Sea, Sumner School, Ko Taku Reo – Deaf Education New Zealand.</p>	Retained as drafted

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		d. <u>Whether there is adequate provision for the timely relocation or removal of buildings and structures, or cessation of activity, and remediation of the site, and mechanisms to ensure this occurs, if considered necessary due to the level of risk.</u>			
08	5.4A.4	<p><u>Discretionary activities</u></p> <p>a. <u>The activities listed below are discretionary activities.</u></p> <p><u>Activity</u></p> <p><u>D1:</u></p> <p>a. <u>The addition of a new building, other than the construction of accessory buildings, extensions/additions to existing buildings, and the replacement of an existing building, located in the area shown on the planning maps as Qualifying Matter Coastal Hazard Medium Risk Management Area</u></p>	Support	The Ministry acknowledges the risk that natural hazards pose a potential risk to the safety of children and to their assets, however recognises that at times there is a operational need to locate within these areas, particularly to serve existing communities. Where there is a medium risk, discretionary activity status is considered to be appropriate.	Retain as proposed.
09	5.4A.5	<p><u>Non-complying activities</u></p> <p>a. <u>The activities listed below are non-complying activities.</u></p> <p><u>NC1</u></p> <p>a. <u>The addition of a building, other than the construction of accessory buildings, extensions/additions to existing</u></p>	Neutral	The Ministry acknowledges the risk that natural hazards pose a potential risk to the safety of children and to their assets, however recognises that at times	Retain as proposed.

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		<u>buildings, and the replacement of an existing building, located in the area shown on the planning maps as Qualifying Matter Coastal Hazard High Risk Management Area.</u>		there is a operational need to locate within these areas, particularly to serve existing communities. Where there is a high risk, non-complying activity status is considered to be appropriate given the users of educational facilities are often vulnerable members of the community.	
Chapter 7 – Transport					
10	<u>7.2.1.9</u>	<p><u>Policy - Pedestrian Access</u></p> <p><u>a. Pedestrian access is designed to:</u></p> <p><u>i. be of a sufficient width and grade that the pedestrian access meets the access requirements of all users, including persons with a disability or with limited mobility;</u></p> <p><u>ii. have a surface treatment that provides for all weather access; and</u></p> <p><u>iii. where required for consistency with Crime Prevention Through Environmental Design (CPTED), have sufficient illumination to provide for the safety of users after dark.</u></p> <p><u>Advice note:</u></p>	Support	The Ministry is supportive of providing pedestrian access and CPTED principles as it seeks to achieve a safe and secure environment for pedestrians.	Retain as proposed.

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		1. <u>Policy 7.2.1.9 also achieves Objectives 7.2.2 and 14.2.4</u>			
Chapter 8 – Subdivision					
11	8.2.3.2	<p>Policy - Availability, provision and design of, and connections to, infrastructure</p> <p>a. Manage the subdivision <u>and development of</u> land to ensure development resulting from the creation of additional allotments:</p> <ul style="list-style-type: none"> i. does not occur in areas where infrastructure is not performing, serviceable or functional; and ii. will be appropriately connected to and adequately serviced by infrastructure, including through any required upgrade to existing infrastructure. <p>b. Ensure that new network infrastructure provided in relation to, or as part of, subdivision and development is constructed, designed and located so that it is resilient to disruption from significant seismic or other natural events including by ensuring that, as far as practicable, damage from such events is minimised.</p> <p>c. Ensure that, as part of subdivision <u>and development</u>, there is adequate provision, with sufficient capacity, to service the scale and nature of anticipated land uses resulting from the subdivision <u>or development</u>, for:</p> <ul style="list-style-type: none"> i. wastewater disposal, including lawful trade waste disposal for anticipated industrial development, consistent with maintaining public health and minimising adverse effects on the environment; 	Support In part	The Ministry support this objective as it enables subdivision, however the Ministry requests that specific provision for additional infrastructure, which includes educational facilities, is provided to ensure that population growth and the impact on schools is considered within developments.	<p>Amend as follows:</p> <p>Availability, provision and design of, and connections to, infrastructure</p> <p>a. Manage the subdivision <u>and development</u> of land to ensure development resulting from the creation of additional allotments:</p> <ul style="list-style-type: none"> i. does not occur in areas where infrastructure is not performing, serviceable or functional; and ii. will be appropriately connected to and adequately serviced by infrastructure, including through any required upgrade to existing infrastructure; <u>and</u> iii. <u>Is supported by additional infrastructure as defined by the National Policy Statement for Urban Development (NPS-UD).</u> <p>b. Ensure that new network infrastructure provided in relation to, or as part of, subdivision and development is constructed, designed and located so that it is resilient to disruption from significant seismic or other natural events including by ensuring that, as far as practicable, damage from such events is minimised.</p> <p>c. Ensure that, as part of subdivision <u>and development</u>, there is adequate provision, with sufficient capacity, to service the scale and nature of anticipated land uses resulting from the subdivision <u>or development</u>, for:</p> <ul style="list-style-type: none"> i. wastewater disposal, including lawful trade waste disposal for anticipated industrial development, consistent with maintaining public health and minimising adverse effects on the environment;

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		<p>ii. water supply, including water of a potable standard for human consumption, and water for fire fighting purposes;</p> <p>ii. telecommunication services including connection to a telecommunication system, with new lines being generally underground in new urban areas; and</p> <p>iii. electric power supply, with new lines being generally underground in new urban areas - including, if necessary, ensuring the provision of new or additional or the upgrading of existing infrastructure in a manner that is appropriate for the amenities of the area.</p> <p>d. Where wastewater disposal is to a reticulated system, ensure all new allotments are provided with a means of connection to the system.</p> <p>e. Where a reticulated wastewater system is not available, ensure appropriate onsite or standalone communal treatment systems are installed.</p> <p>f. Promote use of appropriate on-site measures to manage the effects of trade wastes and reduce peak flows and loading on wastewater systems.</p> <p><u>g. Where subdivision, use or development occurs in the waste water constraint areas, and it is proposed to connect to the vacuum sewer, demonstrate that there is no increase in wastewater volumes from the site as a result or, where there is an increase in wastewater volumes when compared to existing wastewater volumes from the site, there is sufficient capacity in the existing vacuum sewer system to accommodate the additional wastewater flows</u></p>			<p>ii. water supply, including water of a potable standard for human consumption, and water for fire fighting purposes;</p> <p>iv. telecommunication services including connection to a telecommunication system, with new lines being generally underground in new urban areas; and</p> <p>v. electric power supply, with new lines being generally underground in new urban areas - including, if necessary, ensuring the provision of new or additional or the upgrading of existing infrastructure in a manner that is appropriate for the amenities of the area.</p> <p>d. Where wastewater disposal is to a reticulated system, ensure all new allotments are provided with a means of connection to the system.</p> <p>e. Where a reticulated wastewater system is not available, ensure appropriate onsite or standalone communal treatment systems are installed.</p> <p>f. Promote use of appropriate on-site measures to manage the effects of trade wastes and reduce peak flows and loading on wastewater systems.</p> <p><u>g. Where subdivision, use or development occurs in the waste water constraint areas, and it is proposed to connect to the vacuum sewer, demonstrate that there is no increase in wastewater volumes from the site as a result or, where there is an increase in wastewater volumes when compared to existing wastewater volumes from the site, there is sufficient capacity in the existing vacuum sewer system to accommodate the additional wastewater flows</u></p>

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12	8.7.4.3 MOD	<p>Servicing and infrastructure</p> <p>a. Whether each allotment has appropriate servicing and connections to water supply, wastewater disposal, stormwater management systems and other services; whether it is necessary to provide or upgrade services or utilities to enable the allotment to be serviced, and whether the design, location, capacity, type and construction of services and infrastructure, including the suitability of the proposed water supply for fire-fighting purposes, and any required infrastructure upgrades, are acceptable to the Council.</p> <p>b. Whether the electricity and telecommunications supply and connection to any new allotment(s) are appropriate and provide adequate capacity, including whether it is appropriate to require additional space for future connections or technology and whether any ducting or easements are required to achieve connection.</p> <p>c. Whether appropriate provision is made for onsite storm water treatment or connection to a catchment based treatment network.</p> <p>d. Outside the Central City, the contribution of proposals towards the development of an integrated naturalised surface water network of soil absorption, sedimentation and detention basins, wet-ponds, swales and/or wetlands to treat and manage surface water and avoid (where practicable) a proliferation of smaller facilities.</p> <p>e. Outside the Central City, the extent to which the construction or erection of utilities for servicing a site incorporate and/or plant appropriate indigenous vegetation.</p> <p>f. Outside the Central City, whether any proposed ponding area will be attractive to birdlife that might pose a birdstrike risk to the operation of Christchurch International Airport Limited.</p>	Support in part	The Ministry requests that specific provision for additional infrastructure, which includes educational facilities, is provided to ensure that population growth and the impact on schools is considered within developments.	<p>Servicing and infrastructure</p> <p>a. Whether each allotment has appropriate servicing and connections to water supply, wastewater disposal, stormwater management systems and other services; whether it is necessary to provide or upgrade services or utilities to enable the allotment to be serviced, and whether the design, location, capacity, type and construction of services and infrastructure, including the suitability of the proposed water supply for fire-fighting purposes, and any required infrastructure upgrades, are acceptable to the Council.</p> <p>b. Whether the electricity and telecommunications supply and connection to any new allotment(s) are appropriate and provide adequate capacity, including whether it is appropriate to require additional space for future connections or technology and whether any ducting or easements are required to achieve connection.</p> <p>c. Whether appropriate provision is made for onsite storm water treatment or connection to a catchment based treatment network.</p> <p>d. Outside the Central City, the contribution of proposals towards the development of an integrated naturalised surface water network of soil absorption, sedimentation and detention basins, wet-ponds, swales and/or wetlands to treat and manage surface water and avoid (where practicable) a proliferation of smaller facilities.</p> <p>e. Outside the Central City, the extent to which the construction or erection of utilities for servicing a site incorporate and/or plant appropriate indigenous vegetation.</p> <p>f. Outside the Central City, whether any proposed ponding area will be attractive to birdlife that might pose a birdstrike risk to the operation of Christchurch International Airport Limited.</p> <p>g. Outside the Central City, where wastewater capacity is close to reaching a limit, whether to reduce the lapsing period of the subdivision consent below five years to enable that capacity to be utilised by others if the development opportunity that is the subject of the consent is not implemented.</p>

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		<p>g. Outside the Central City, where wastewater capacity is close to reaching a limit, whether to reduce the lapsing period of the subdivision consent below five years to enable that capacity to be utilised by others if the development opportunity that is the subject of the consent is not implemented.</p> <p>h. The ability for maintenance, inspection and upgrade of utilities and infrastructure occur, including ensuring continued access for the same.</p> <p>i. The extent to which the design will minimise risk or injury and/or property damage from utilities or infrastructure.</p> <p>j. The extent to which potential adverse effects of electricity lines, including visual impacts, are mitigated, for example through the location of building platforms and landscape design.</p> <p>k. The suitability of the proposed water supply for fire-fighting purposes (the Council may obtain a report from the Chief Fire Officer), including the extent of compliance with SNZ PAS:4509:2008 in respect of the health and safety of the community, including neighbouring properties.</p> <p>l. The extent to which conditions are appropriate on a subdivision consent in a Residential New Neighbourhood Future Urban Zone in order to give effect to the development requirements specified in the relevant outline development plan.</p> <p>m. In zones other than the Residential New Neighbourhood Future Urban Zone, the extent to which a development needs to comply with any flexible element of an outline development plan, including for phasing or location of infrastructure; and consideration of the effects of the movement of any elements on other landowners of land located within or adjacent to the outline development plan area, or on the safe, efficient or effective operation of infrastructure.</p>			<p>h. The ability for maintenance, inspection and upgrade of utilities and infrastructure occur, including ensuring continued access for the same.</p> <p>i. The extent to which the design will minimise risk or injury and/or property damage from utilities or infrastructure.</p> <p>j. The extent to which potential adverse effects of electricity lines, including visual impacts, are mitigated, for example through the location of building platforms and landscape design.</p> <p>k. The suitability of the proposed water supply for fire-fighting purposes (the Council may obtain a report from the Chief Fire Officer), including the extent of compliance with SNZ PAS:4509:2008 in respect of the health and safety of the community, including neighbouring properties.</p> <p>l. The extent to which conditions are appropriate on a subdivision consent in a Residential New Neighbourhood Future Urban Zone in order to give effect to the development requirements specified in the relevant outline development plan.</p> <p>m. In zones other than the Residential New Neighbourhood Future Urban Zone, the extent to which a development needs to comply with any flexible element of an outline development plan, including for phasing or location of infrastructure; and consideration of the effects of the movement of any elements on other landowners of land located within or adjacent to the outline development plan area, or on the safe, efficient or effective operation of infrastructure.</p> <p>n. Within the Lyttelton Port Influences Overlay, the imposition of an appropriate, volunteered condition prohibiting noise sensitive activities on the allotments, to be complied with on a continuing basis, for the purpose of incorporation into a consent notice to be issued by the Council.</p> <p>o. Whether wastewater disposal and stormwater management systems recognise the cultural significance of Ngā Wai sites of Ngāi Tahu cultural significance identified in Schedule 9.5.6.4, and do not create additional demand to discharge directly to Ngā Wai.</p>

Appendix 1

ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought
		<p>n. Within the Lyttelton Port Influences Overlay, the imposition of an appropriate, volunteered condition prohibiting noise sensitive activities on the allotments, to be complied with on a continuing basis, for the purpose of incorporation into a consent notice to be issued by the Council.</p> <p>o. Whether wastewater disposal and stormwater management systems recognise the cultural significance of Ngā Wai sites of Ngāi Tahu cultural significance identified in Schedule 9.5.6.4, and do not create additional demand to discharge directly to Ngā Wai.</p>			<p><u>p. Whether the development is supported by additional infrastructure as defined by the National Policy Statement for Urban Development (NPS-UD).</u></p>

Chapter 13 – Specific Purpose Zones – School

13	13.6.4.1.3 RD5	<p>a. For schools within High Density Residential zones, (within Town Centre and Large Local Centre Intensification Precincts or within Residential Precincts), any building between 14 and 20 metres in height, when the following standards are met:</p> <p>i. The building shall have a maximum height of 20 metres at 10 metres from a road boundary or internal boundary; and</p> <p>ii. The building shall either:</p> <p>a. Not exceed 30m in continuous building length, or</p> <p>b. Provide a recess for every additional 30m of building length or part thereof, with a minimum</p>	Support in part	<p>The Ministry support the intent of this rule however considers there is a drafting error in the wording. The rule refers to schools <u>within</u> High Residential Density zones, however where schools are zoned Specific Purpose School zone they are not within an alternate residential zone, rather adjoin it. In some cases, a school which is zoned Specific Purpose School zone may adjoin two residential</p>	<p>Amend as follows:</p> <p>a. For schools within adjoining the High Density Residential zones, (within Town Centre and Large Local Centre Intensification Precincts or within Residential Precincts), any building between 14 and 20 metres in height, when the following standards are met:</p> <p>i. The building shall have a maximum height of 20 metres at 10 metres from a road boundary or internal boundary; and</p> <p>ii. The building shall either:</p> <p>a. Not exceed 30m in continuous building length, or</p> <p>b. Provide a recess for every additional 30m of building length or part thereof, with a minimum dimension of 4</p>
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Appendix 1

ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought
		<p>dimension of 4 metres in length and 2 metres deep, for the full height of the building including the roof.</p> <p>b. i. For schools within the High Density Residential zone (outside of Residential Precincts), standard a. ii. In RD5 also applies; and</p> <p>ii. The maximum height shall be 32 metres at 10 metres from a road or internal boundary.</p>		<p>zones and the current wording would give rise to confusion regarding what rules apply.</p> <p>As such, the Ministry requests an amendment to the wording from 'within' to 'adjoining'</p>	<p>metres in length and 2 metres deep, for the full height of the building including the roof.</p> <p>b. i. For schools within the High Density Residential zone (outside of Residential Precincts), standard a. ii. In RD5 also applies; and</p> <p>ii. The maximum height shall be 32 metres at 10 metres from a road or internal boundary</p>
14	13.6.4.2.2 ii.	<p><u>Height in relation to boundary</u></p> <p>a. No part of any building shall project beyond a building envelope contained by:</p> <p>ii. High Density Residential (both within and outside of Intensification or Residential Precincts):</p> <p>There shall be no recession plane above 14 metres in height if the building is set back 10 metres or more from a boundary with a residential zone.</p>	Support in part	<p>The Ministry support the intent of this rule however considers there is a drafting error in the wording. The rule refers to schools <u>within</u> High Residential Density zones, however where schools are zoned Specific Purpose School zone they are not within an alternate residential zone, rather adjoin it. In some cases, a school which is zoned Specific Purpose zone may adjoin two residential zones and the current wording would give rise to confusion</p>	<p>Amend as follows:</p> <p><u>Height in relation to boundary</u></p> <p>a. No part of any building shall project beyond a building envelope contained by:</p> <p>ii. <u>sites adjoining the</u> High Density Residential (both within and outside of Intensification or Residential Precincts):</p> <p>There shall be no recession plane above 14 metres in height if the building is set back 10 metres or more from a boundary with a residential zone.</p>

Appendix 1					
ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought
				<p>regarding what rules apply.</p> <p>As such, the Ministry requests an amendment to the wording from 'within' to 'adjoining'</p>	
15	13.6.4.2.6	<p><u>Landscaping</u></p> <p>a. <u>10% of each site shall be planted including landscape strips along boundaries.</u></p> <p>b. <u>At least one tree shall be planted within the relevant landscaping strip per 10 metres of road boundary or part thereof.</u></p> <p>c. <u>At least one tree shall be planted within the relevant landscaping strip per 30 metres of internal boundary or part thereof.</u></p> <p><u>All landscaping/trees required under these rules shall be undertaken in accordance with the provisions in Appendix 6.11.6.</u></p>	Oppose	<p>The Ministry is supportive of landscaping within school properties and has internal guidelines and standards to address boundary treatments and landscaping on school sites. However, it opposes the proposed specific provision and requests this provision to be removed. Any landscaping requirements will be considered and accounted for within an OPW in accordance with s176, therefore the Ministry considers that the proposed requirement is not necessary a</p>	<p>Amend as follows:</p> <p><u>Landscaping</u></p> <p>a. <u>10% of each site shall be planted including landscape strips along boundaries.</u></p> <p>b. <u>At least one tree shall be planted within the relevant landscaping strip per 10 metres of road boundary or part thereof.</u></p> <p>c. <u>At least one tree shall be planted within the relevant landscaping strip per 30 metres of internal boundary or part thereof.</u></p> <p><u>All landscaping/trees required under these rules shall be undertaken in accordance with the provisions in Appendix 6.11.6.</u></p>

Appendix 1					
ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought
				The Ministry also notes its need for the ability to cater for additional growth in school roll as a consequence of intensification of surrounding residential zones on sites may already be by constrained by size or existing facilities.	
16	13.6.5.1 MOD	<p>Amenity of <u>Effects on</u> the neighbourhood</p> <p>a. Effects on amenity of adjoining properties, including daylight and sunlight admission.</p> <p>b. Any visual dominance over adjoining properties, or their outlook to the street; or visual dominance over the street or nearby public open space.</p> <p>c. Any loss of privacy for adjoining properties through overlooking.</p> <p>d. Alternative practical locations for the building on the site.</p> <p>e. Opportunities for landscaping and tree planting, as well as screening of buildings <u>that reduce the visual dominance of buildings, vehicle access and parking areas and contributes to the amenity of neighbouring sites and to public and publicly accessible space.</u></p>	Support	The Ministry supports the inclusion of CPTED Principles as it seeks to achieve a safe and secure environment. Furthermore, the Ministry supports an effects based framework which provides greater clarity around the outcomes sought within the zone.	Retain as drafted

Appendix 1					
ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought
		<p>f. Whether the nature and form of development on adjoining site(s) mitigates the potentially adverse effects of increased height or building scale.</p> <p>g. The compatibility of the building in terms of appearance, layout and scale of other buildings and sites in the surrounding area, including whether increased height would result in buildings which significantly contrast with the scale of surrounding development, both existing and permitted.</p> <p>h. The balance of open space and buildings on the site, in the context of:</p> <ul style="list-style-type: none"> i. The character of the surrounding zone(s); and ii. The contribution of the buildings and grounds to local landscape character. <p>i. <u>Addresses Crime Prevention Through Environmental Design (CPTED) Principles, including achieving a positive street interface.</u></p>			
Chapter 14 – Residential					
14.2 Objectives and Policies					
17	14.2.6	<p>Objective – Medium Density Residential Zone</p> <p>a. Medium density residential areas of predominantly MDRS-scale development of three- or four-storey buildings, including semi-detached and terraced housing and low-rise</p>	Support in part	Council has an obligation under the NPS-UD to ensure sufficient 'additional infrastructure'	<p>Amend as follows:</p> <p>Objective – Medium Density Residential Zone</p>

Appendix 1					
ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought
		apartments, with innovative approaches to comprehensively designed residential developments, whilst providing for other compatible activities		<p>(which includes educational facilities) is provided in development, and local authorities must be satisfied that additional infrastructure to service the development capacity is likely to be available (see Policy 10 and 3.5 of Subpart 1 of Part 3: Implementation, in particular).</p> <p>Educational facilities should therefore be enabled to service the growth enabled by PC14, Educational facilities typically locate in residential zones to support the surrounding residential catchments. Therefore, the Ministry requests that wording is included to acknowledge that development in residential areas should be supported by educational facilities to help meet the needs and</p>	a. Medium density residential areas of predominantly MDRS-scale development of three- or four-storey buildings, including semi-detached and terraced housing and low-rise apartments, with innovative approaches to comprehensively designed residential developments, whilst providing for other compatible activities <u>and development is supported by educational facilities.</u>

Appendix 1					
ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought
				demand of local communities in the future.	
14.4 Rules - Residential Suburban Zone and Residential Suburban Density Transition Zone					
18	14.4.1.3 RD30	<p>a. The following activities and facilities located within the 50 dB Ldn Air Noise Contour and the Qualifying Matter Airport Noise Influence Area as shown on the Planning Maps:</p> <p>i. Residential activities which are not provided for as a permitted or controlled activity;</p> <p>ii. Education activities (Rule 14.4.1.1 P16);</p> <p>iii. Preschools (Rule 14.4.1.1 P17); or iv. Health care facilities (Rule 14.4.1.1 P18)</p> <p>v. Visitor accommodation in a heritage item Rule 14.4.1.1 P30). (Plan Change 4 Council Decision subject to appeal)</p> <p>b. Any application arising from this rule shall not be publicly notified and shall be limited notified only to Christchurch International Airport Limited (absent its written approval).</p>	Neutral	The Ministry supports this rule as it seeks to protect sensitive users, which encompasses tamariki, rangatahi and kaiako, from noise effects, as delineated by the Airport Noise Influence Area.	Retain as proposed.

ENDS

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 15/05/2023

First name: Howard

Last name: Pegram

Preferred method of contact Postal

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:

Detailed submission attached.

Sunlight access.

Attached Documents

Name	
Howard Pegram PC14 submission	

Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

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

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

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

* Required information

Name* HOWARD PEGRAM
Address* 221A CENTAURUS RD., ST. MARTINS, CH-CH. Postcode* 8022
Email NONE - Sorry ☹️ Phone no. (03) 33 22 535

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

Organisation's name N/A
Your role N/A

Trade competition and adverse effects* (select appropriate) ⇒ NOT APPLICABLE - Sorry

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

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

(a) adversely affects the environment, and

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

☐ Yes ☒ No

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

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

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

Joint submissions (Please tick this box if you agree)

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

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

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

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

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

Signature Howard Pegram Date 30 APRIL, 2023.

Have your say

Housing and Business Choice Plan Change 14

A. The specific provisions of the plan change that my submission relates to are as follows:*
(Please continue on separate sheet(s) if necessary.)

The specific provisions of the plan change, that my submission relates to, are to do with Direct 'Sunlight Access'. (also see note regarding S.A.D. effects)
The updating of Recession Planes, Set-backs and exemptions, and the Enabling Housing Act ⇒ please see separate sheets.

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

My submission is that I do not support the use of 'Intensification Streamlined Planning Process', as a general application, across all of Christchurch suburban areas. I totally oppose the erection of any new Residential Building(s) (7 metres, or up to at least 12 metres, high) where they will directly effect the 'Direct Sunlight' access of existing Residential Houses, where any adjacent land is being developed (vacant or demolished house(s) land) ⇒ please see separate sheets.

C. I seek the following decision from the Council:*
(Please give precise details stating what amendments you wish to see made to the proposed Plan Change. Please continue on separate sheet(s) if necessary.) Thanks.

I seek the following decision(s) from the Council:-

1. That new and modified 'Qualifying Matters with regard to 'Direct Sunlight Access' be made a non-negotiable requirement of all planning/building consents for new, or rebuilt/modified, 'Residential Housing'.

2. That direct 'Sunlight Access', to any existing private residential housing, adjacent to any developments/rebuilds is an ... ⇒ please see separate sheets ☺
SEE

HOWARD PEGRAM: 221A CENTAURUS RD., ST. MARTINS, CH-CH. 3322535.

Sheet 3 of 9.

Speical Health Warning Note:-

Many ordinary people in New Zealand, especially in the South Island, suffer from S.A.D. (Seasonal Affective Disorder) and are mostly unaware of this odd condition; and, are mostly undiagnosed. Lack of Sun Light, on a regular basis, causes a direct effect on our bodies. (There is no source or national numbers available on this topic)

The lack of Sun Light, on a regular basis, causes a direct effect on our bodies. This S.A.D. condition affects our mood, mental health and general health; and causes an array of other problems and disorders:-

1. Lower Vitamin 'D' levels.
2. Low mood and depression (in some extreme cases leading to suicide!).
3. A chemical imbalance in the body and brain causing lower Serotonin levels and poor sleep patterns (and Body Clock); when experiencing reduced Sun Light hours, continuously.

This condition (S.A.D.) is now recognised by the Medical Community as a 'real' problem, with more of a negative affect on people than first thought.

Continued ...

HOWARD PEGRAM: 221A CENTAURUS RD., ST. MARTIN, CH-CH. 3322535.

Speical Heath Warning Note continued:

Sheet 4 of 9

Dr. Micheal Mosley covers the S.A.D. condition very well in his book: 'Fast A sleep', with references to the science behind this problem and quotes the published Medical Papers on it.

Do not under estimate this problem, or it's actual existence.

Enclosed Drawing:

Sheet 5 of 9.

The enclosed drawing, drawn accurately to scale, is to show graphically the effects of a 7 metre high building being built 2.7 metres away from the southern boundary of a section. It clearly shows the Sun Light 'blocking effect', of the new 7 metre high building, on the existing single storey neighbouring house; for approximately ten weeks either side of the Shortest Day (21st June).

The house in the drawing is of course ours. It was intended to be our last home before we die, with various upgrades and enhancements undertaken to make it warm and comfortable in our retirement and old age.

Loosing Winter Sun is totally unacceptable to us at this stage of our lives!

Our overwhelming worry/fear is that the vacant land (at 67 Nagio Street) adjacent to our northern boundary, with only one existing house on its total land area, will be developed with new 'high' buildings.

The loss of our Winter Sun Light is a situation totally unacceptable to us and infinges on our basic Human Rights!

Continued...

HOWARD PEGRAM: 221A CENTAURUS RD., ST. MARTINS, CH-CH. 3322-535.

Enclosed Drawing note continued:

Sheet 6 of 9.

Imposing arbitrary Consenting rule changes, retrospectively, which govern Recession Planes and Access to Direct SunLight, by a 'Blanket Law', from an Act of Parliament, is totally unacceptable and 'draconian'; and, as stated above goes against our basic Human Rights! Please, please don't do this to us. ☹️

Cont... single storey house and garden/section shown on the right-hand side (marked '*'), would have it's North facing part of the House, and garden, over-shadowed by the newer/higher building, next to it, on it's Northern Boundary.

This situation is totally unfair, taking a large amount of value from the property and it's desirability; and forcing the owners/tenants to live in the colder shadow of the newer/higher buildings through the winter months!

This situation is totally unacceptable and is inhumane too!

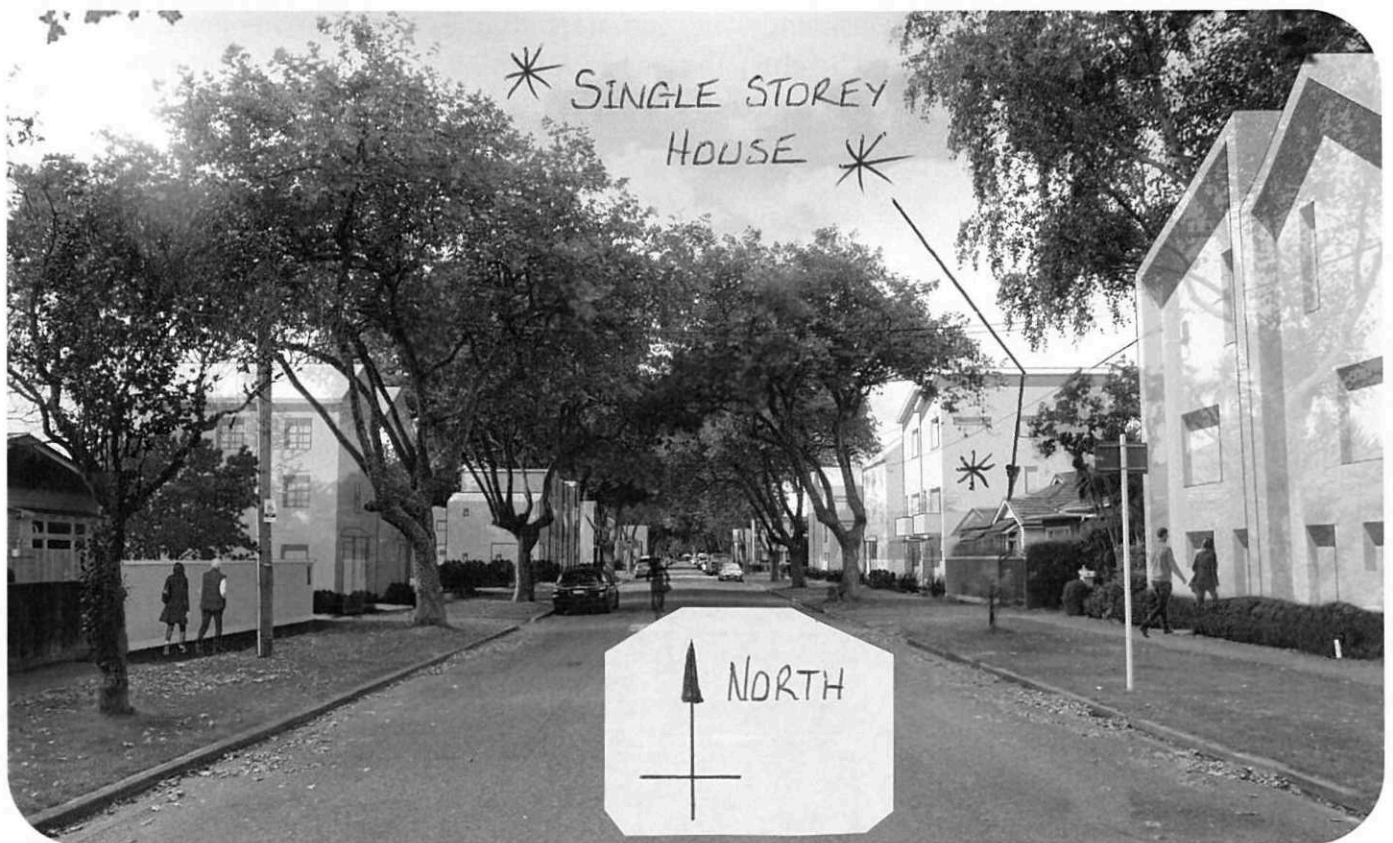
Thank you for reading and considering my notes and submission.

Yours faithfully,
Howard Pegram.

'Have your say on the District Plan changes' Sheet 7 of 9
 Consultation document:-

Well done to all those involved in designing and producing this useful Feedback/Submission booklet. The layout, graphics and photo's are great with a good and brief guide to help us 'everyday-people'. Well done!

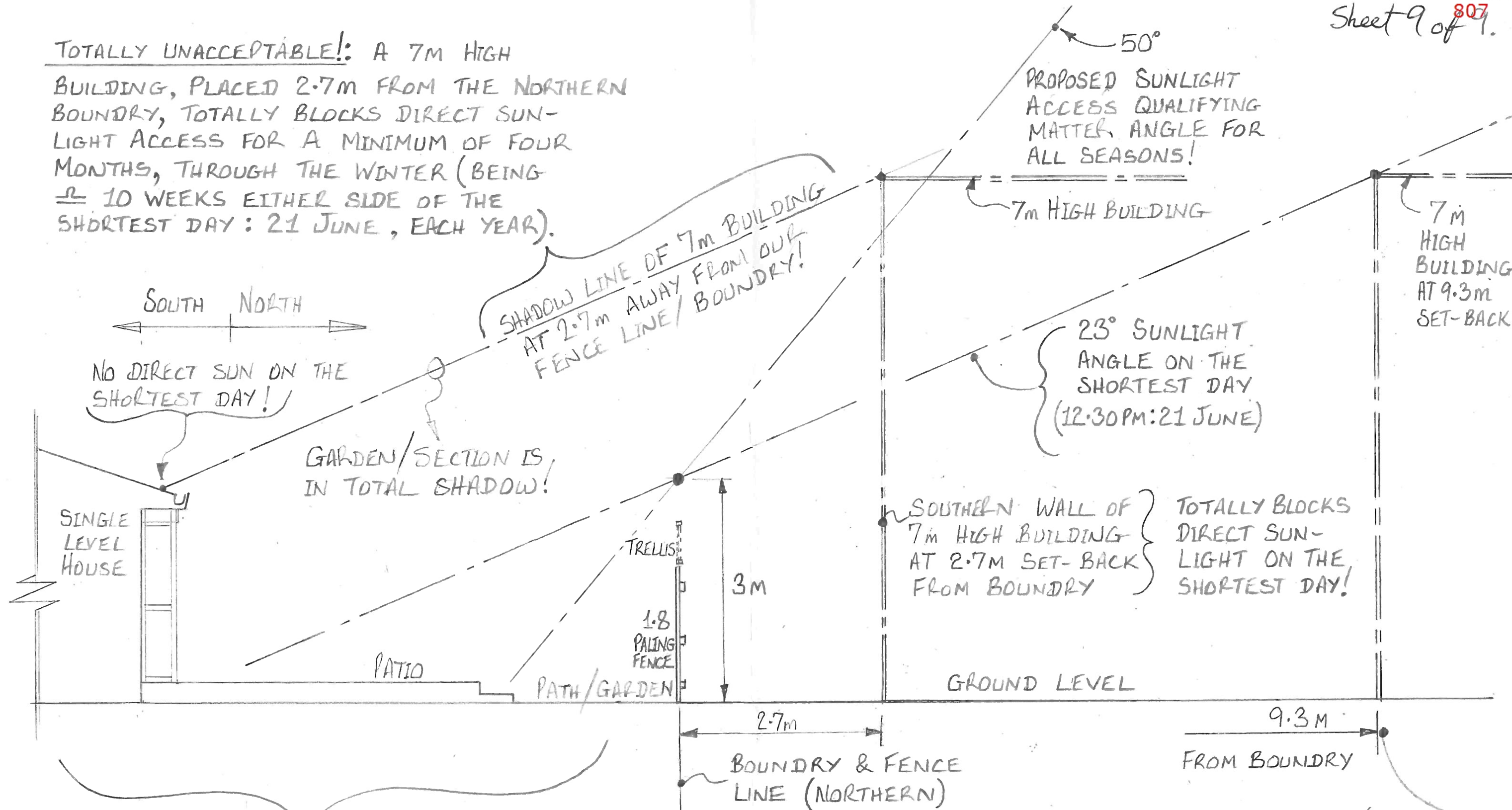
The indicative illustrations (on page 10 of the booklet) are helpful too. In the Medium-Density illustration (attached below), it shows a mix of



Indicative illustration only: Medium-Density Residential Standards (MDRS). → TAKEN FROM PAGE 10 OF THE CONSULTATION DOCUMENT.

both older and newer/higher houses/buildings. If the street shown above, in this illustration, ran North/South, then the older single storey Cont..

TOTALLY UNACCEPTABLE!: A 7m HIGH BUILDING, PLACED 2.7m FROM THE NORTHERN BOUNDARY, TOTALLY BLOCKS DIRECT SUNLIGHT ACCESS FOR A MINIMUM OF FOUR MONTHS, THROUGH THE WINTER (BEING 2 10 WEEKS EITHER SIDE OF THE SHORTEST DAY: 21 JUNE, EACH YEAR).



HOUSE & GARDEN/SECTION ELEVATION LOOKING EAST.
221A CENTAURUS RD., ST. MARTINS.

VACANT LAND AT 67 NAGIO STREET.

NOTE:

IF A 7m HIGH NEW BUILDING IS CONSENTED TO BE BUILT NEXT TO THE NORTHERN BOUNDARY OF AN EXISTING RESIDENTIAL HOUSE — THIS WOULD MAKE THAT ORIGINAL PROPERTY, UNLIVEABLE, AND MORE OR LESS 'WORTHLESS' AND 'UNSALEABLE'. THE NEW BUILD (AT 7m HIGH) SHOULD BE PLACED AT A MINIMUM OF 9.3m FROM THE BOUNDARY!

DRAWING SCALE: 2cm = 1m.

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

15/05/2023

First name:


Josh

Last name:

Garmonsway

Preferred method of contact

Attached Documents

Name	
Josh	

Robson, Gina

From: Generation Zero <noreply@123formbuilder.com>
 Sent: Wednesday, 10 May 2023 12:12 am
 To: Engagement
 Subject: CCC District Plan Changes (PC14) - Generation Zero Quick Submit / 531

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

Form Summary

- | | |
|--|---|
| 1. First / Last name | Josh Garmonsway |
| 2. Email address | Garmonsway.josh@gmail.com |
| 3. Postal Address | 89 Balrudry Street
Avonhead
8042 |
| 4. Trade competition/adverse effects: | Option 1: I could not gain in trade competition through this submission |
| 5. Answer if you selected option 2 above: | Are you directly affected by a possible effect of this plan change in a way that it:
a. adversely affects the environment, and
b. does not relate to the trade competition or the effects of trade competitions |
| Chapter 6 - Tree Canopy Cover and Financial Contributions | The council will require 20% of new residential developments to be covered by trees, or otherwise pay a financial contribution to help the council plant more trees on public land. Christchurch has an appallingly low tree canopy cover rate of 13% compared to Auckland (18%) and Wellington (30%). Trees have a wide range of environmental, health, social and economic benefits and are important for the future of our city. |

Form Summary

I support the Tree Canopy Cover rules and Financial Contributions to restore our tree canopy. Trees are important in reducing emissions, providing shade and temperature control in the summer, alongside the other wide range of economic, health and social effects. I seek that the council retains the tree canopy requirement and contributions plan.

Chapter 14 - Low Public Transport Accessibility Area Qualifying Matter

The council plans to restrict housing in some areas of the city because they are poorly serviced by the lack of current high frequency public transport routes. Some areas solely designated with this qualifying matter such as in Casebrook and Styx are close to rail corridors, existing commercial areas and are serviced by low frequency routes. In the future, these areas could see a boost in service by more buses on current routes or introduction of a commuter rail service.

I oppose the Low Public Transport Accessibility Area Qualifying Matter as I believe that the public transport layout and network will need changes to prepare and accommodate future growth. We should not define future growth in Christchurch based on these routes. This would also artificially limit future housing in our city. I seek that the council drop this qualifying matter.

Chapter 14 - Sunlight Access Qualifying Matter

There are many cities in the world that have high density and are further from the equator than Christchurch. Cities such as Vienna, Copenhagen, Toronto, Geneva, and Calgary are consistently ranked some of the most livable cities in the world. This qualifying matter would reduce the maximum height and size of medium residential buildings below what is legally required. This qualifying matter has been developed with the expressed purpose of protecting and increasing property values rather than increasing the amount of affordable housing for people.

I oppose the Sunlight Access Qualifying Matter. There are many cities in the Northern Hemisphere that are further away from the equator and have a higher level of housing intensification than Christchurch. With a mix of medium and high density housing, these cities are considered some of the most livable cities in the world. This qualifying matter would restrict medium density housing height and size in such a way that would create a less efficient usage of land and limit future housing. I seek that the council drop this qualifying matter.

Chapter 14 - High-Density Residential Zone

The council is required by law to allow residential buildings of at least 6 storeys within a 1.2km radius of commercial centres such as malls and the city centre. The council plan to enable this, while also allowing up to 10 storeys for residential buildings closer to the city centre. This would enable a wider range of dense housing development options. It would also allow more people to live close to services and amenities.

I support high-density housing near the city and commercial centres. We need to allow more people to live near services and amenities to reduce car dependency. This would allow more people to take active and public transport to commute, shop and play. I seek that the council

Form Summary

enable 6 to 10 storeys for residential buildings near commercial centres.

Any other comments?

The message has been sent from 161.29.136.204 nz at 2023-05-10 on Chrome 113.0.0.0

Entry ID: 186

Referrer: (no referrer)

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

Submitter Details

First name: Anita

Last name: Collie

Organisation: Scenic Hotel Group Limited

Preferred method of contact Email

Attached Documents

Name
Plan Change 14 Submission-88 and 96 Papanui Rd and 19 Holly Rd-FINAL

Form 5
Submission on notified proposal for a Plan Change
 Clause 6 of Schedule 1, Resource Management Act 1991

To: **Christchurch District Council**

Name of Submitter: **Scenic Hotel Group Limited**

Background

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

- (d) rezoning of industrial areas near the central city for housing and mixed-use activities;
- (e) introducing qualifying matters to reduce the scale and density of buildings enabled by the MDRS and NPS-UD is reduced; and
- (f) amending objectives, policies, and other provisions throughout the District Plan.

Introduction

5. This is a submission on PC14 made by Scenic Hotel Group Limited (**the submitter**). The submitter has interests in the properties 88 and 96 Papanui Road and 19 Holly Road, Christchurch (**the site**). Legal descriptions and Record of Titles can be seen in **Table 1** below.

Table 1 Legal description and Records of Title

Address	Legal Description	Record of Title
88 Papanui Road	Part Lot 43 Deposited Plan 364	CB20B/22
96 Papanui Road	Lot 2 Deposited Plan 25250	CB7A/247
19 Holly Road	Lot 2 Deposited Plan 15583	C542/153

6. The property is depicted in **Figure 1** below.

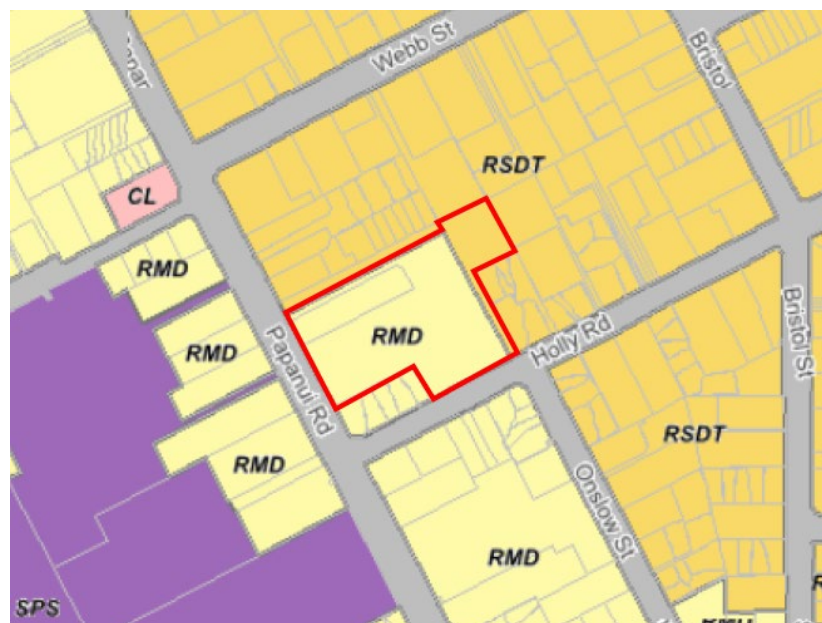


Figure 1 Location of the properties with operative District Plan zoning illustrated (CCC District Plan).

7. The properties are located on Papanui Road which is a minor arterial road and Holly Road which is a local road. The properties have legal access from these roads.
8. The properties at 88 and 96 Papanui Road are located within the Residential Medium Density Zone and are subject to the Accommodation and Community Facilities Overlay under the operative District Plan. This part of the site is proposed to be zoned High Density Residential and will also be within the Large Local Centre Intensification Precinct under PC14. 96 Papanui Road will also be within the High Density Residential Precinct under PC14.
9. The property at 19 Holly Road is located within the Residential Suburban Density Transition Zone under the operative District Plan, and is not subject to the Accommodation and Community Facilities Overlay. This part of the site is proposed to be zoned High Density Residential and will also be within the High Density Residential Precinct under PC14.

Specific provisions of the plan change that this submission relates to

10. The submitter has an interest in the plan change as a whole and therefore this submission relates to all provisions and zonings of the plan change. The submitter has a specific interest in all provisions and zoning that relate to the properties referred to above.

Submission

11. The submitter both **supports** and **opposes** the plan change as notified. More specifically:
 - (a) the submitter supports the intensification of urban form to provide for additional development capacity, particularly near the city and commercial centres, and supports any provisions or changes to the District Plan that will achieve this outcome; and
 - (b) the submitter opposes any provisions or changes that will adversely affect the outcome in (a);
 - (c) the submitter requests that the site is rezoned to an alternative zone that provides for commercial and visitor accommodation activity, better reflecting the long-established use of the site and better giving effect to the NPS-UD.
12. The submitter has historically operated the Scenic Hotel Cotswolds from the site. The proposed zoning and provisions do not reflect the existing use of the site, nor the commercial nature of the surrounding sites along Papanui Road. The proposed zoning is inconsistent, with each of the component titles having a different combination of precincts proposed under PC14.
13. Under the Operative Christchurch District Plan, the site is within the Residential Medium Density Zone and (except for 19 Holly Road) is subject to the Accommodation and Community Facilities overlay. Operation of the Submitter's business is a permitted activity under Rule 14.5.3.1.1P2 within the overlay.

14. The Accommodation and Community Services Overlay describes areas along high-capacity urban roads and within Residential Zones that are considered suitable for guest accommodation developments, given their close proximity to district centres and public transport. These locations currently exhibit high levels of non-residential activity.¹
15. Under PC14 there is no recognition of the existing commercial activities operating on Papanui Road, and no provision for the continuation of visitor accommodation activities in the High Density Residential Zone.
16. The Accommodation and Community Services Overlay and the associated rule framework is provided for in the Medium Density Residential Zone. The migration of these provisions into the High Density Residential Zone chapter appears to be an oversight, and the submitter considers that it is imperative that this is addressed.
17. The submitter has long term plans to redevelop the site with a mixed-use commercial and visitor accommodation development. This type of development is not provided for under the notified PC14 provisions, however, would be in accordance with the intensification outcomes sought by the NPS-UD and would more appropriately reflect the commercial and visitor accommodation activity along Papanui Rd near the site.
18. The submitter considers that a commercial zoning would more appropriately reflect the existing environment.
19. Policy 3 of the NPS-UD is of direct relevance, whereby at sub clause (a) it directs that the district plan is to enable building heights and density of urban form to realise as much *development capacity* as possible, to maximise benefits of intensification in city centre zones.
20. “Development Capacity” is a defined term in the NPS-UD and means the capacity of land to be developed for housing or for business use, based on:
 - (a) the zoning, objectives, policies, rules, and overlays that apply in the relevant proposed and operative RMA planning documents; and
 - (b) the provision of adequate development infrastructure to support the development of land for housing or business use.
21. Rezoning the site to provide for commercial and visitor accommodation activity, along with commensurate changes to the District Plan to provide for this submission and give effect to the NPS-UD will:
 - (a) provide for the historic visitor accommodation activity on the site;
 - (b) enable future redevelopment of the existing activity, with complementary commercial activity in an appropriate location, being along a high-capacity urban road, in close proximity to centre zones and public transport;
 - (c) supports the economic growth of the District, and therefore the economic well-being of communities;

¹ Source: Council Planning Maps website

- (d) not have any discernible effects on the amenity of adjoining residential zones, or undermine the residential coherence of residential neighbourhoods;
- (e) maintain a sufficient supply of housing in the district;
- (f) contribute to the social and economic well-being of communities and meet the reasonably foreseeable needs of future generations;
- (g) represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means;
- (h) give effect to the NPS-UD (notably Policy 3) and Canterbury Regional Policy Statement; and
- (i) promote the sustainable management of natural and physical resources, will be consistent with Part 2 of the Resource Management Act 1991 and ultimately achieve its purpose.

Relief Sought

22. The submitter seeks the following relief:

- (a) Rezone the site to provide for visitor accommodation and commercial activities, and any related and consequential changes to provisions of the District Plan (including the retention of any operative overlays);
- (b) Consider rezoning surrounding properties if this was considered necessary to assist the relief sought in (a);
- (c) Include provisions to enable the range of matters outlined in paragraph 4 above that together assist with ensuring PC14 gives effects to the NPS-UD;
- (d) any other additional or consequential relief to the District Plan, including but not limited to, the maps, issues, objectives, policies, rules, controls/discretions, assessment criteria and explanations that will give effect to the matters raised in this submission and the relevant planning legislation.

Other

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

DATED 12 May 2023



pp. _____

Scenic Hotel Group Limited

Address for Service:

Town Planning Group
PO Box 35
Christchurch

Contact Person:

Anita Collie

Cell:

021 568 335

E-mail:

anita@townplanning.co.nz

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date: 12/05/2023

First name: Anita **Last name:** Collie

Organisation:
Regulus Property Investments Limited

Preferred method of contact Email

Attached Documents

Name
Plan Change 14 Submission-149 Waimairi Road-FINAL

Form 5
Submission on notified proposal for a Plan Change
 Clause 6 of Schedule 1, Resource Management Act 1991

To: **Christchurch District Council**

Name of Submitter: **Regulus Property Investments Limited**

Background

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

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

Introduction

5. This is a submission on PC14 made by Regulus Property Investments Limited (**the submitter**). The submitter has interests in the property legally described as Lot 4 Deposited Plan 14690 as held within the Record of Title Cb533/27, located at 149 Waimairi Road, Christchurch (**the Site**).
6. The property is located within the Residential Suburban Zone under the operative District Plan. The site is proposed to be zoned Medium Density Residential under PC14.

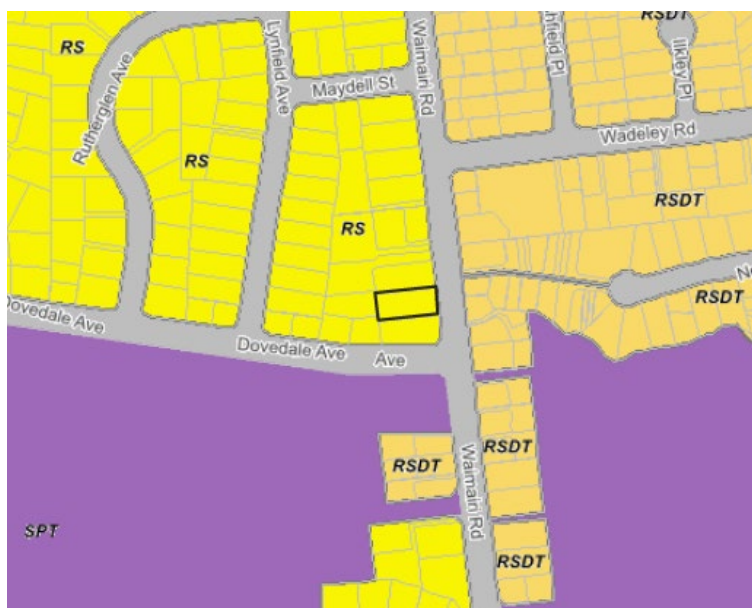


Figure 1 Site location (Christchurch Operative District Plan Maps)

Specific provisions of the plan change that this submission relates to

7. The submitter has an interest in the plan change as a whole and therefore this submission relates to all provisions and zonings of the plan change. The submitter has a specific interest in all provisions and zoning that relate to the properties referred to above.

Submission

8. The submitter both **supports** and **opposes** the plan change as notified. More specifically:

- (a) the submitter supports the intensification of urban form to provide for additional development capacity, particularly near the city and commercial centres, and supports any provisions or changes to the District Plan that will achieve this outcome; and
 - (b) the submitter opposes any provisions or changes that will adversely affect the outcome in (a);
 - (c) the submitter requests that the submitter's property and surrounding properties are rezoned to High Density Residential, better reflecting the site context in an area of high housing demand and better giving effect to the NPS-UD.
- 9. The Submitter's site and surrounding locale is ideally suited for a higher density of development, being in a location that exhibits a clear and immediate need for further housing supply in a convenient location to public transportation, and in walking distance to the University of Canterbury.
- 10. The Submitter also considers that the density standards as set out in the Amendment Act best achieve the NPS-UD, and PC14 should be amended to reflect those.
- 11. Rezoning the site and surrounding area to provide for high density residential development along with commensurate changes to the District Plan to provide for this submission and give effect to the NPS-UD will:
 - (a) enable more people to live in an urban environment where there is a high demand for housing in the area, relative to other areas in the urban environment;
 - (b) contribute to the social and economic well-being of communities and meet the reasonably foreseeable needs of future generations;
 - (c) represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means;
 - (d) give effect to the NPS-UD (notably Policy 3) and Canterbury Regional Policy Statement; and
 - (e) promote the sustainable management of natural and physical resources, will be consistent with Part 2 of the Resource Management Act 1991 and ultimately achieve its purpose.

Relief sought

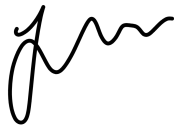
- 12. The Submitter seeks that the NPS-UD is properly and fully given effect to through the provisions and zoning of PC14 through the intensification of development through enabling plan provisions and an increase in development capacity for residential and business use across the district.
- 13. The Submitter primarily seeks the following from the Council:
 - (a) the submitters site and the surrounding area be rezoned to High Density Residential or another zone with similar development attributes;

- (b) reject, refuse, or otherwise decline the Qualifying Matters that do not align with that directed by the Central Government through the Amendment Act; and
- (c) any other additional or consequential relief to the District Plan, including but not limited to, the maps, issues, objectives, policies, rules, controls/discretions, assessment criteria and explanations that will give effect to the matters raised in this submission and the relevant planning legislation.

Other

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

DATED 12 May 2023



pp. _____

Regulus Property Investments Limited

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PO Box 35
Christchurch

Contact Person: Anita Collie
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E-mail: anita@townplanning.co.nz

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Luke

Last name: Hinchey

Organisation:

Retirement Villages Association of New Zealand Inc

On behalf of:

Retirement Villages Association of New Zealand Inc

Preferred 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:

Please see attached submission on PC14.

My submission is that:

Please see attached submission on PC14.

Attached Documents

Name
RVA - Submission on Plan Change 14 Christchurch

**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 (*Council*)

Name of submitter: Retirement Villages Association of New Zealand Incorporated (RVA)

- 1 This is a submission on the Council's proposed amendments to the Christchurch District Plan: Housing and Business Choice Plan Change 14 – Christchurch District Plan (PC14).
- 2 The RVA could not gain an advantage in trade competition through this submission.

INTRODUCTION

- 3 The RVA welcomes this opportunity to provide feedback on PC14. The RVA and its members have a significant interest in how PC14 provides for retirement villages in Christchurch City. We have had a reasonably long and positive engagement with the Council, particularly on recent plan changes to address ageing population needs. We generally support what Council proposes for PC14 to implement the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (*Enabling Housing Act*).
- 4 New Zealand, including Christchurch City, has a rapidly increasing ageing population and longer life expectancy and there is a growing trend of people wishing to live in retirement villages.
- 5 The under-provision of retirement living and aged care in New Zealand is at crisis point. The growing ageing population is facing a significant shortage in appropriate accommodation and care options. This problem is immediate. Demographic changes mean that the demand for retirement accommodation and aged care will continue to grow.
- 6 The Government recently recognised the ageing population as one of the key housing and urban development challenges facing New Zealand in its overarching direction for housing and urban development – the Government Policy on Housing and Urban Development (GPS-HUD).¹ The GPS-HUD records that “[s]ecure, functional housing choices for older people will be increasingly fundamental to wellbeing”.² The government strategy *Better later life – He Oranga Kaumatua 2019 to 2034* recognises that “[m]any people want to age in the communities they

¹ The GPS-HUD was issued in September 2021 (available [online](#)).

² GPS-HUD, page 10.

already live in, while others wish to move closer to family and whānau, or to move to retirement villages or locations that offer the lifestyle and security they want”.³

- 7 The RVA acknowledges that the operative district plan, including the agreed changes resulting from the recent Plan Change 5 appeals processes, do recognise and provide for retirement villages in appropriate zones to an extent. That said, the regime needs to be refined and modernised. Based on our learnings from consenting retirement villages in the City in recent years, as well as the more enabling context of the Enabling Housing Act, we consider PC14 needs to go further to adequately address the critical need for retirement accommodation and aged care in Christchurch City. Ultimately, PC14 must provide a clear and consistent regime for retirement villages that generally aligns with the treatment of other multi-unit residential developments, but with some necessary nuances to acknowledge their unique differences (as is already enshrined in the Plan). It is also important that potential effects from retirement villages are managed proportionately and efficiently with the least regulation and prescription necessary. The significant benefits of retirement villages also need to be given appropriate weight.
- 8 We note that some of the changes we seek also support the RVA’s need for much greater national consistency. The RVA is also seeking very similar changes in the planning regimes for retirement villages through the other intensification planning instruments required under the Enabling Housing Act. National consistency will greatly assist with streamlining and making more efficient, the delivery of retirement villages across New Zealand.
- 9 This submission is set out as follows:
 - 9.1 **Background:** This section introduces the RVA, retirement villages and the regulatory regime applying to retirement villages. It then sets out New Zealand’s ageing population demographics and outlines the retirement housing and care crisis and the wellbeing and health issues arising from that crisis. Finally, it sets out the role of retirement villages in addressing that crisis and the other benefits of retirement villages.
 - 9.2 **What PC14 must deliver for retirement villages:** This section sets out the outcomes the RVA considers PC14 must deliver for retirement villages. The key outcomes sought by the RVA are:
 - (a) the appropriate translation of the Medium Density Residential Standards (MDRS) and other Enabling Housing Act requirements into the District Plan; and
 - (b) a refined retirement village-specific planning framework that addresses practical issues and inconsistencies the current plan provisions, and adopts the key features of the MDRS as appropriately modified in all appropriate zones.
 - 9.3 **Relief sought:** This section sets out the relief sought by the RVA to address the key outcomes it seeks in relation to PC14. The RVA’s specific submission points and relief sought on are set out in **Appendix 1**.

³ *Better Later Life – He Oranga Kaumatua 2019 to 2034* (available [online](#)), page 32.

BACKGROUND

RVA

- 10 The RVA is a voluntary industry organisation that represents the interests of the owners, developers and managers of registered retirement villages throughout New Zealand. The RVA was incorporated in 1989 to represent the interests of retirement village owners, developers and managers, to government, develop operating standards for the day-to-day management of retirement villages, and protect their residents' wellbeing.
- 11 Today, the RVA has 407 member villages throughout New Zealand, with approximately 38,520 units that are home to around 50,000 older New Zealanders. This figure is 96% of the registered retirement village units in New Zealand.⁴ The RVA's members include all five publicly-listed companies (Ryman Healthcare, Summerset Group, Arvida Group, Oceania Healthcare, and Radius Residential Care Ltd), other corporate groups (such as Metlifecare and Bupa Healthcare) independent operators, and not-for profit operators (such as community trusts, and religious and welfare organisations).

Retirement villages

- 12 'Retirement village' is an umbrella term given to all types of retirement living. There are two main types of retirement villages - 'comprehensive care villages' and 'lifestyle villages':
- 12.1 Comprehensive care retirement villages provide a full range of living and care options to residents from independent living, through to serviced care, rest home, hospital and dementia level care.
- 12.2 Lifestyle retirement villages focus mostly on independent living units with a small amount of serviced care provided on a largely temporary basis.
- 13 Approximately 65% of registered retirement villages have some level of aged residential care within the village. Approximately 19,300 aged care beds are part of a retirement village, which is 50% of all age care beds in the country.⁵
- 14 'Retirement village' is defined in section 6 of the Retirement Villages Act 2003 (*RV Act*) as:

... the part of any property, building, or other premises that contains 2 or more residential units that provide, or are intended to provide, residential accommodation together with services or facilities, or both, predominantly for persons in their retirement, or persons in their retirement and their spouses or partners, or both, and for which the residents pay, or agree to pay, a capital sum as consideration and regardless of [various factors relating to the type of right of occupation, consideration, etc]...

A regulated industry

- 15 The retirement village industry is regulated by the Retirement Villages Act 2003 (*RV Act*), as well as associated regulations and codes of practice established through the RV Act. The regulatory regime is focussed on consumer protection via a

⁴ There are also almost 6,000 Occupation Right Agreements for care suites as part of the aged care system.

⁵ Jones Lang LaSalle, NZ Retirement Villages and Aged Care Whitepaper, July 2022, page 4.

comprehensive disclosure regime, so that residents make an informed decision to move to a village.

- 16 This regulatory regime includes the following:
 - 16.1 Registration of retirement villages with the “Registrar of Retirement Villages”. The Registrar places a memorial on the land title. The memorial means that the village can only be sold as a retirement village and that the residents’ tenure is ranked above all other creditors to the village. The residents have absolute rights to live in their units and have access to the village amenities.
 - 16.2 Retirement village operators are required to appoint a “Statutory Supervisor” whose job is to protect residents’ interests and report to the Registrar and the Financial Markets Authority that the village is being operated in a financially prudent manner.
 - 16.3 Operators are required to provide intending residents with a disclosure statement that sets out the village’s ownership, financial position, status, and a range of other important information. This statement provides comprehensive guidance to ensure that a resident’s decision to move into a retirement village is an informed one.
 - 16.4 Before signing a contract (an “Occupation Right Agreement” or “ORA”), an intending resident must consult a solicitor who must explain the details of the contract and sign an affirmation that they have provided that advice.
- 17 The codes of practice that regulate the industry include a code of practice and a code of residents’ rights.⁶ The Code of Practice is administered by the Ministry of Business, Innovation and Employment, and it governs the day-to-day management of the villages. The Code sets out the minimum standards for the operation of retirement villages. These standards address a wide variety of matters, including documents that operators must provide to intending residents, staffing policies and procedures, safety and security policies, fire and emergency procedures, the frequency and conduct of meetings between residents and operators, complaint procedures, as well as communications with residents.
- 18 The Code of Residents’ Rights is set out in the RV Act.⁷ The Code is a summary of the minimum rights conferred on retirement village residents. It ensures that residents are respected and consulted on material matters that affect their contracts.⁸

New Zealand’s ageing population

- 19 The proportion of older people in our communities compared to the rest of the population is increasing. Soon, there will be more people aged 65+ than children aged under 14 years.⁹ By 2034, it is expected that New Zealand will be home to

⁶ Both codes are available online ([Code of Practice](#) and [Code of Residents Rights](#)).

⁷ Schedule 4.

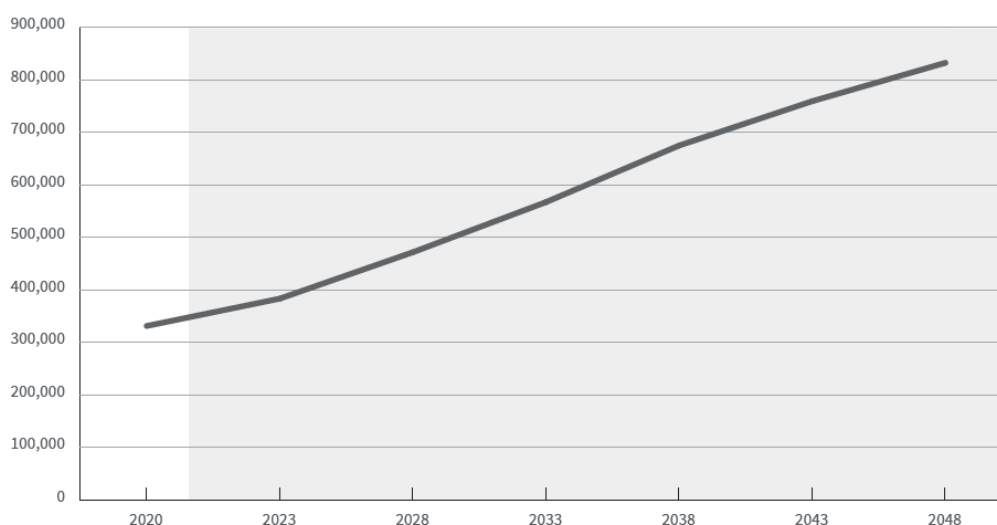
⁸ The Code sets out a residents’ rights to services, information, and consultation, the right to complain, the right to a speedy and efficient process for resolving disputes, the right to use a support person or representative in dealings with the operator or other residents at the village, the right to be treated with courtesy, and the right not to be exploited by the operator.

⁹ Better Later Life – He Oranga Kaumatua 2019 to 2034, page 6.

around 1.2 million people aged 65 and over, just over a fifth of the total population.¹⁰

- 20 The growth in the 75+ age bracket is also increasing exponentially (as illustrated by the graph below). It is estimated that 364,100 people in New Zealand were aged over 75 in 2022. By 2048, the population aged 75+ is forecast to more than double to 804,600 people nationally.¹¹
- 21 In Christchurch City, the growth in the 75+ age bracket is similar to the national average. Statistics New Zealand estimates that in 2023, 28,490 people are aged over 75. By 2048, this number is forecasted to almost double to 49,800.¹²

Figure 1 75+ years population 2020 - 2048



Source: JLL Research and Consultancy; Statistics New Zealand (medium forecast scenario)

- 22 Older people aged 85+ comprise the most rapidly increasing age group in the country, with the numbers projected to almost triple from 93,500 in 2022 to 227,600 in 2048. Given around 45% of this age group require aged care beds, this growth will create a need for a minimum of an additional 84,700 aged care beds to be provided by 2048.
- 23 The ageing population of New Zealand reflects the combined impact of:
- 23.1 Lower fertility;
 - 23.2 Increasing longevity (due to advances in medical technology and increased survival rates from life-threatening diseases); and
 - 23.3 The movement of the large number of people born during the 1950s to early 1970s into the older age groups.

¹⁰ Ibid.

¹¹ Statistics New Zealand, Population Projections.

¹² Statistics New Zealand, Subnational Population Estimates at 11 May 2023.

- 24 The largest increases in the 65+ age group will occur in the 2020s and 2030s, when the large birth cohorts of the 1950s and 1960s (the “baby boomers”) move into this age group.

The retirement housing and care crisis

- 25 The under-provision of retirement living and aged care in New Zealand is at crisis point. The growing ageing population is facing a significant shortage in appropriate accommodation and care options. This problem is immediate, and projected to worsen in the coming decades as older age groups continue to grow.¹³
- 26 The demand for quality living options is significantly higher than the current supply. The supply is decreasing due to closures of older style small and poor quality aged care homes, which are usually conversions of old houses. These usually do not offer the living standard that residents deserve. At the same time, demand for retirement housing and care is increasing.
- 27 This crisis is evidenced by the increasing number of RVA members’ villages that have waiting lists (including existing villages and those under construction). Many RVA member villages have waiting lists of two or more years. These lists are comprised of people who have expressed an interest in living in a retirement village. The waitlists show the desperate need in New Zealand for more retirement living and care options.
- 28 The ageing population and longer life expectancy, coupled with a trend towards people wishing to live in retirement villages that provide purpose-built accommodation, means that demand is continuing to grow. This is creating a severe and growing shortage of retirement villages, as supply cannot match demand. The national penetration rate for retirement villages (i.e. the percentage of the population aged 75+ who choose to live in a village) is 14.3%. If the existing penetration rate continues, we can expect an increase of approximately 34,000 residents, and a national demand for an additional 26,000 retirement village units by 2033.¹⁴ In reality, the demand will be higher as the penetration rate continues to grow.
- 29 This increasing demand is reflected in the development pipeline.¹⁵ In 2022, there was a total of 216 villages in the development pipeline.¹⁶ This development pipeline, if realised, will help ease the short-term anticipated shortfall in supply of quality retirement living and aged care options in New Zealand. However, further development of new villages, beyond the current pipeline, is needed to meet the longer-term predicted shortfall. It is anticipated that at least 10 new large scale villages each year are going to be required across New Zealand, just to keep up with demand over the next 20 years.
- 30 Further, the COVID-19 pandemic has exacerbated this issue. Overall, retirement villages performed remarkably well in protecting the most vulnerable by providing

¹³ See, for example, Stats NZ (2020). Housing in Aotearoa: 2020, which outlines the need for changing size and suitability of housing, acknowledging the ageing population. For further detail on the question of ‘what is the ideal place to grow older’, see Janine Wiles, Kirsty Wild, Ngaire Kerse, Mere Kēpa, Carmel Peteru (2011). Resilient Ageing in Place Project Recommendations and Report. The University of Auckland, Auckland.

¹⁴ Jones Lang LaSalle, NZ Retirement Villages and Aged Care Whitepaper, July 2022, page 18.

¹⁵ The ‘development pipeline’ refers to the development of new villages (both actual and planned).

¹⁶ Jones Lang LaSalle, NZ Retirement Villages and Aged Care Whitepaper, June 2021, page 17.

safe communities and companionship during the tough periods of lockdown. This performance has resulted in an even stronger demand to access retirement villages and further limited stock available.¹⁷

- 31 As discussed in more detail in subsequent sections of this paper, a key barrier to meeting the increasing demand is the significant delay between the consenting and construction stages of developments. Even if the resource consent process goes smoothly, the development of a retirement village is around a 10 year project for most new villages. But, many retirement villages face years of delays during the consenting process. Delays are frustrating and costly for all involved. They are especially prejudicial to the wellbeing of older persons who are living in unsuitable accommodation while waiting for a retirement village to be completed.

Social issues arising from the shortage of housing and care for older people

- 32 Providing appropriate accommodation and care for older persons is a critical social issue facing New Zealand. A failure to recognise and provide for appropriate housing and care for the ageing population in future planning will impact on the mental and physical health and wellbeing of some of society's most vulnerable members. And, it will have flow on effects that will impact the wider community as a whole.

Suitability of accommodation

- 33 Many of New Zealand's older residents are currently living in unsuitable accommodation. "Unsuitable accommodation" in this context can mean a couple or a single person living in a large house that is expensive and difficult to maintain and heat properly, has barriers to mobility such as stairs, or is built on a hill, or has a garden that they cannot maintain. Unsuitable accommodation could also include housing that is of such a distance from key services and amenities that it limits their access to their community and care needs.
- 34 In this context, it is important to note that retirement villages have a very different new-build pattern than the rest of the country's new-build housing stock.¹⁸ New Zealand's general housing stock is dominated by three or more bedroom dwellings, with the average size of new builds increasing from around 115 m² in 1976 (33 m² per person) to 200 m² in 2013 (71 m² per person).
- 35 In contrast, the retirement village industry is building units that match the needs of smaller households, with approximately 90% of retirement village units providing one or two bedrooms.¹⁹
- 36 Retirement units are also purpose-built for older people. They are accessible for those with mobility restrictions, are modern, warm and comfortable, and responsibility for their upkeep and maintenance falls on the village operator rather than the resident.
- 37 Further, retirement villages generally offer extensive on-site amenities, such as pools, gyms, theatres, libraries, bars and restaurants, communal sitting areas, activity rooms, bowling greens, and landscaped grounds. These amenities are

¹⁷ Ibid, pages 5 and 25.

¹⁸ CRESA, Retirement Village Housing Resilience Survey (June 2014), and Equity Release – Realities for Older People (August 2016).

¹⁹ CRESA, Equity Release – Realities for Older People, August 2016.

provided to meet the specific needs of retirement village residents, leading to significant positive benefits for residents.

Mental wellbeing

- 38 Mental wellbeing issues are also growing, including isolation, loneliness, and related depression due to many older people living alone, and often also being separated from family and friends due to their increasing mobility restrictions.
- 39 This presents a serious social issue for New Zealand. There is little doubt that older people are particularly vulnerable to social isolation or loneliness because friends and family have either died or moved away, or they have restricted mobility or income. This isolation impacts on the individual's quality of life and wellbeing, adversely affecting their health and increasing their use of health and social care services. In exploring the prevalence of this issue, one study estimates that between 5 and 16% of people aged 65+ report loneliness, while 12% feel socially isolated.²⁰
- 40 Based on recent data collected by UMR Research New Zealand,²¹ the most important factors for people when deciding to move into a retirement village are 'security and safety', 'peace of mind' and 'hassle-free lifestyle'. Importantly, the data also shows that retirement villages deliver on these important factors. The changing structure of society, resulting in families living far apart and older people living on their own, has resulted in many older people feeling isolated and lonely. Villages provide safe, warm, appropriate housing and a community of interest for their residents with the opportunity for socialisation should they choose to take it up. Villages therefore directly combat isolation and loneliness felt by so many older people.
- 41 Longitudinal studies into recorded lifespans show that older people who are part of a social group have a better chance of living longer than those who are not. Australian studies suggest that retirement village residents live longer and happier lives than the same cohort who live elsewhere.²²
- 42 Retirement villages are an important way to fight social isolation and loneliness. Facilitating the development of appropriate accommodation and care for the ageing population and enabling older people to move into purpose built, comfortable and secure dwellings not only improves the quality of life of these older people. It also has wider benefits for the community as a whole. The improved social and health support provided in retirement villages alleviates pressure placed on health and social care services freeing up these resources for other community members. The movement of older people into retirement villages also releases existing housing stock for other people, as addressed in more detail below.

The role of retirement villages

Addressing the retirement housing and care crisis

- 43 Retirement villages already play a significant part in housing and caring for older people in New Zealand. As previously noted, currently 14.3% of the 75+ age group

²⁰ Social Care Institute for Excellence, Research Briefing number 39, Preventing loneliness and social isolation: Intervention and Outcomes, October 2011.

²¹ UMR Research New Zealand, 'Residents Survey – Retirement Villages Association', January 2021. The results were based on questions asked in an online survey distributed to 100 retirement villages across New Zealand.

²² For example, studies undertaken by the Illawarra Retirement Trust, a retirement village operator based in Wollongong, NSW.

population live in retirement villages, a penetration rate that has risen from around 9.0% of the 75+ age population at the end of 2012.²³ It is likely that this rate will continue to increase over time.

- 44 In Christchurch, 19.1% of the 75+ age group population live in a retirement village. This demographic makes up 6.8% of the total Christchurch population, which, combined with the City's overall projected 75+ population growth, suggests there will be a continued demand for retirement villages in the City.²⁴
- 45 As previously mentioned, RVA's members have 407 villages across the country, providing homes for around 50,000 residents. Over the next 5 to 10 years, that is anticipated to grow significantly with 86 new villages and 130 expansions to existing villages, providing 22,200 homes for approximately additional 28,900 residents. Retirement villages therefore will play a growing role in addressing the retirement housing and care crisis.
- 46 In the wider Christchurch region, there are currently 60 existing villages with 3,694 units that are home to around 4,800 residents. Of these 60 villages, 28 are in some stage of expansion or development. When complete, they will add a further 2,205 units that will be a home for another 2,860 residents.²⁵ A number of additional villages will therefore be needed in the City to meet the growth in the 75+ demographic, as well as anticipated increases in the penetration rate.
- 47 The RVA's members have established reputations for building high quality villages to address the needs of residents and employing professional and caring staff. Through this experience, retirement village operators have developed in depth and specialist knowledge and expertise in the development of purpose built retirement villages. Importantly, retirement village operators are not developers, and have a long term interest in their villages and residents.
- 48 Retirement villages also cater to a wide range of residents with differing levels of health and independence, offering a range of housing options and care to meet the specific needs of the residents. These are features that often distinguish retirement village operators from typical residential developers who generally do not deliver purpose built environments for the ageing population.
- 49 Retirement village operators are therefore well placed to help to address the retirement housing and care crisis. To do so, it is critical that the construction, operation and maintenance of retirement villages are appropriately provided for in planning regimes.
- 50 ***Providing a range of accommodation options to suit different needs***
Retirement villages provide appropriate accommodation and care for a vulnerable sector of our community with different housing and care needs compared to the rest of the population.

²³ Ibid, page 15.

²⁴ Information taken from Jones Lang LaSalle NZ Retirement Villages and Aged Care Whitepaper July 2022 and 2018 census.

²⁵ Information taken from Jones Lang LaSalle NZ Retirement Villages and Aged Care Whitepaper July 2022 and 2018 census.

- 51 Retirement villages allow older people to continue living in their established community, while down-sizing to a more manageable property (i.e. without stairs or large gardens). Retirement village living provides security, companionship and peace of mind for residents.²⁶ Residents will also, in most cases, have easy access to care and other support services.
- 52 The RVA has seen a marked change in retirement accommodation over the last 20 years. In the past, lifestyle villages without care were relatively common. As the population ages, the retirement village industry is seeing a greater demand for a 'continuum of care' in one location - from independent units through to hospital and dementia care. Today, many villages are being developed with some degree of residential care in their campus. Some villages are committed to a full continuum of care, while others focus on providing a smaller number of rest home beds that are available for residents if they are needed.
- 53 Another important trend is for operators to build serviced apartments, where a resident moves in and out of care as required but without having to physically move from their apartment. These developments are a direct response to market demands. The sector is focused on providing a mix of independent living units and care options to meet the range of financial, social and other resources our residents have.
- 54 A number of operators also focus on providing social housing as part of their villages. This can be a mix of affordable Occupation Right Agreements and rental units.
- 55 'Care only' facilities are increasingly rare. This is because under the current government funding regime for health care provision, it is not possible to justify the capital cost of building stand-alone residential care facilities. As a result, no residential care facilities, apart from extensions to existing facilities, have been built in the last five years or so.
- 56 Ultimately, the retirement village industry provides appropriate accommodation to address the specific needs of the older population, including a range of large and smaller scaled retirement villages and aged care homes with differing services, amenities and care. This variety enables differing price points and options, which are vital to enabling choices for the growing ageing population.
- Retirement villages' role in addressing the general housing crisis***
- 57 Retirement villages also help to ease demand on the residential housing market and assist with the housing supply shortage in New Zealand. That is because growth in retirement village units is faster than growth in the general housing stock. And, the majority of new villages are located in major urban centres. The retirement village sector therefore also contributes significantly to the development of New Zealand's urban areas, and the particular challenges urban areas face.
- 58 New build data from Statistics NZ shows that retirement village units constituted between 5% and 8% of all new dwellings between June 2016 and June 2021.

²⁶ PWC 'Retirement village contribution to housing, employment, and GDP in New Zealand' (March 2018). Brown, N.J., "Does Living Environment Affect Older Adults Physical Activity Levels?". Grant, Bevan C. (2007) 'Retirement Villages', *Activities, Adaptation and Aging*, 31:2, 37-55.

- 59 The retirement village sector allows older New Zealanders to free up their often large and age-inappropriate family homes and move to comfortable and secure homes in a retirement village. The RVA estimates that around 5,500 family homes are released back into the housing market annually through new retirement village builds. This represents a significant contribution to easing the chronic housing shortage. A large scale village, for example, releases approximately 300 houses back onto the market to be more efficiently used by families desperate for homes. To illustrate, retirement units are generally occupied by an average of 1.3 people per unit, compared to an average of 2.6 people per standard dwelling.

Other benefits of retirement villages

- 60 In addition to the important role of retirement villages in addressing the housing crisis and providing the ageing population with housing and care tailored to their needs, the retirement village sector also produces other broader benefits:
- 60.1 The sector employs approximately 19,000 people to support day-to-day operations. Between 2018 and 2026, approximately 9,500 new jobs will have been created from construction of new villages. The sector contributes around \$1.1 billion to New Zealand's GDP from day-to-day operations.²⁷ More recently, and importantly, the sector has generated jobs in industries that have been impacted by COVID-19 (such as hospitality and accommodation).
- 60.2 The contribution of retirement village construction is also substantial. For example, a large scale new village will cost in the order of \$100-\$200 million to construct. Retirement village construction is also expected to employ approximately 5,700 FTEs each year.²⁸
- 60.3 Retirement villages also support Te Whetu Ora, Health New Zealand by providing health care support for residents that would otherwise be utilising the public healthcare system thereby reducing "bed blocking" in hospitals.
- 60.4 Due to the lower demand for transport (including because of on-site amenities), retirement villages contribute proportionately less to transport emissions than standard residential developments. Operators also invest in a range of other methods to reduce carbon emissions from the construction and operation of villages.

WHAT PC14 MUST DELIVER FOR RETIREMENT VILLAGES

Better enable housing and care for the ageing population

- 61 As explained above, promoting the wellbeing of older persons within our communities requires district plans to better enable the construction of new retirement villages. In the experience of RVA members, cumbersome, rigid and uncertain resource management processes and practices are a major impediment to delivering necessary retirement housing and care. In particular, resource consent processes take too long, are unnecessarily complex, and often do not provide for retirement living options properly because the relevant plans are not fit for purpose.
- 62 Although as noted, the operative district plan already provides a policy and rule regime for retirement villages, PC14 represents a major opportunity to better enable

²⁷ PWC 'Retirement village contribution to housing, employment, and GDP in New Zealand' (March 2018) page 4.

²⁸ Ibid.

the provision of a diverse range of retirement housing and care options. The current regime is inconsistent across different zones and contains too wide discretions. Accordingly, it has created challenges in implementation. And, the enabling nature of the Enabling Housing Act now requires a more responsive regime that removes overly restrictive planning restrictions. The opportunity exists to remove existing consenting challenges facing retirement village operators and to bring the regime into line with the Enabling Housing Act.

- 63 The NPSUD specifically recognises that well-functioning urban environments enable all people and communities to provide for their wellbeing, health and safety (Objective 1). For the reasons explained in detail above, achieving this wellbeing objective in relation to older persons within our community means providing for their specific housing and care needs.
- 64 The NPSUD also states that contributing to well-functioning urban environments means enabling a “*variety of homes*” to meet the “*needs ... of different households*” (Policy 1), and that cannot be achieved in our major centres without enabling significant intensification of our urban environments (Policy 3). These NPSUD policies therefore require PC14 to specifically respond to the need to provide suitable and diverse housing choices and options for our ageing population as part of the intensification of urban environments.
- 65 The Enabling Housing Act builds on the NPSUD as part of the Government’s response to reduce barriers to housing supply. The Enabling Housing Act puts in place specific requirements to provide for medium density housing as a minimum in all relevant residential zone. Retirement villages will not be permitted activities under the MDRS because of the “*no more than 3 residential units per site*” density standard (clause 10). However, retirement villages require “*the construction and use of 4 or more residential units on a site*”. They will therefore be restricted discretionary activities under the MDRS. Accordingly, the RVA considers PC14 must include a refined restricted discretionary activity rule for retirement villages in all relevant residential zones.
- 66 It is also important to emphasise (as PC14 acknowledges) that the Enabling Housing Act does not only require Tier 1 councils to implement the medium density requirements in relevant residential zones but also to give effect to Policy 3 of the NPSUD regarding intensification of urban environments.²⁹ Accordingly, PC14 also needs to enable intensification (through building heights and densities) that responds to the location of centres and rapid transit stops. In some cases, that intensification must include “building heights of at least 6 storeys” and must achieve the objective of enabling more people to live in areas where there is a high demand for housing (Objective 3 of the NPSUD).
- 67 In order to meet the Enabling Housing Act requirements, to give effect to the NPSUD, and respond to the significant health and wellbeing issues created by the current retirement housing and care crisis, PC14 must ensure that the Christchurch District Plan specifically and appropriately provides for and enables retirement villages in all relevant residential and commercial/mixed use zones.
- 68 The RVA considers this outcome can only be achieved by refining the existing retirement village provisions. In the experience of RVA members, without these refinements framework, retirement village proposals will face material uncertainty

²⁹ RMA, s77G.

and consenting barriers. The retirement village-specific framework and other changes sought by the RVA are set out in the following sections of this submission.

Recognise that retirement villages are a residential activity

- 69 A key issue with many existing district plans is their failure to explicitly recognise that retirement villages are a residential activity. This issue has resulted in consenting challenges with members of the community, and sometimes even council officers, taking the view that retirement villages are non-residential activities that should only be provided for in non-residential zones or seeking to assess different parts of a village in a different manner (such as a commercial activity).
- 70 Retirement villages are clearly a residential activity³⁰ as they provide permanent homes for the residents that live there. Retirement villages do provide a range of ancillary services. However, those services are provided for residents only and complement the residential function of retirement villages by meeting the particular needs of older residents. The residential nature of retirement villages is reflected in the national planning standard definition, which recognises the key function of villages as a "*residential complex or facilities*" for the provision of "*residential accommodation for people who are retired*".³¹
- 71 This recognition requires that retirement villages as a land use are a permitted activity. In line with the Enabling Housing Act, the RVA considers the construction of retirement villages (being four or more residential units on a site) can be regulated as a restricted discretionary activity, as is currently proposed, but with some refinements.
- 72 The RVA also seeks that the current "retirement village" definition be updated to reflect the National Planning Standard definition. Doing so will provide greater national consistency and allow Council to meet its statutory requirements to include National Planning Standard definitions in its plan.

Provide for retirement villages in all appropriate zones

- 73 The RVA members' experience is that older people want to stay in the communities in which they currently live, and have lived for many years, during their retirement. This is called 'ageing in place'. Ageing in place allows residents to remain close to their families, friends, familiar amenities and other support networks. It promotes activities that improve residents' wellbeing, including physical activity, social engagement and intergenerational activity, due to the accessible surrounding destinations in a familiar neighbourhood. Ageing also allows residents to continue to play an integral part in the communities that they helped establish.
- 74 For these reasons, the majority of retirement village residents come from dwellings located in surrounding suburbs.
- 75 It is noted that the Christchurch Replacement District Plan Independent Hearings Panel (chaired by a former High Court judge, with members including another

³⁰ The definition of 'residential activity' as set out in the National Planning Standards is: "*means the use of land and building(s) for people's living accommodation*".

³¹ National Planning Standard, page 62.

former High Court judge, an Environment Court judge and experienced independent commissioners) acknowledged the importance of ageing in place:³²

[332] Dr Humphrey's evidence stressed the clear health and social evidence of people ageing in their own communities. We have also taken particular note of Dr Humphrey's evidence as to the importance of providing choice for ageing in place. That evidence was supported by the evidence of Mr de Roo. We find that ageing in place, whereby older persons have choices to downsize from their family homes yet remain within their familiar neighbourhoods, is important not only for the wellbeing of our older citizens but also for the communities of which they should continue to contribute to and be part of. In addition to providing choice, assisting affordability is also important. Those priorities are also generally reflected in the Statement of Expectations.

- 76 Similar issues were recognised in the Proposed Auckland Unitary Plan section 32 evaluation:³³

Existing legacy plans do not provide the flexibility required by retirement villages to construct buildings that are 'fit for purpose' in terms of providing for a range of housing and care choices for older people and those requiring care or assisted living. As Auckland's population continues to grow, it is important that a choice of housing is provided for older people, particularly in locations that provide good amenity and access to community services and facilities.

- 77 Further, the RVA members' experience is that sites in existing residential areas that are appropriate for retirement villages are extremely rare. Sites of the required size and in good locations are highly unique and valuable resources in our larger cities. They need to be efficiently used.
- 78 The need to provide for older persons to 'age in place' and lack of appropriate sites for retirement villages, requires a planning framework that enables retirement villages in all appropriate zones.
- 79 It is also noted that the traditional 'intensification model' seeking to provide higher heights and densities closer to centres and rapid transit stops is less applicable to retirement villages. Many residents do not travel for work and are generally less mobile. The RVA therefore considers retirement villages should be able to establish in areas of the City currently proposed to be zoned "residential suburban" (purportedly on the basis of their lack of access to public transport). As noted later in the appendix, the RVA is also concerned that these particular restrictions go beyond the intent of the Enabling Housing Act. As such, these areas should be zoned medium density residential, unless other qualifying matters apply and have been robustly justified.
- Provide for change to existing urban environments**
- 80 There are key differences between retirement villages and 'typical' residential dwellings. These differences mean that retirement villages do change the existing urban environments that are dominated by 'typical' dwellings. This change has not been acknowledged properly in planning frameworks leading to a range of consenting challenges.

³² Decision 10 – Residential (part) (and relevant definitions and associated planning maps) (10 December 2015).

³³ Auckland Unitary Plan Section 32 Report, Part 2.50.

- 81 Because of their functional and operational needs, retirement village and aged care facilities tend to be larger (in height and bulk) than 'typical' residential housing in order to properly cater for resident needs.
- 82 To illustrate, retirement villages contain a range of unit types to cater for the different care and mobility needs of the residents. The accommodation ranges from independent townhouses and apartments, through to serviced apartments, hospital beds and dementia rooms. While independent living villas, townhouses and apartments will include full kitchens, bathrooms, lounges and other household amenities, serviced apartments and care rooms will not always have these amenities. These factors may be a key driver for the layout and amenities within a unit and also within a village. For example, serviced apartments and care rooms need to have quick, accessible, and all weather access to communal living and dining areas. In the experience of RVA members', council officers often attempt to redesign village layouts based on what they think might be suitable, without proper knowledge of villages and residents' needs.
- 83 In addition, retirement villages often include a wide range of amenities and services for resident needs and convenience. Services range from communal indoor and outdoor amenity areas, gardens, pools, gyms, libraries, reflection spaces, hairdressing services and cafés and bars through to welfare and medical facilities. These are important amenities and services as many retirement village residents are frail or have mobility restrictions (making it more difficult for them to travel to access amenities and services). They also provide a better quality of life for residents than could be offered without these communal amenities and services. For example, a townhouse would not have space for a pool or gym.
- 84 Retirement villages also use new, low maintenance building products and design techniques to ensure their efficient operation. These design requirements can result in change when compared to surrounding neighbourhoods that were built many decades in the past.
- 85 The experience of RVA members' is that communities (particularly neighbouring landowners seeking to preserve status quo interests) and council officers often can have an expectation as to how sites are going to be used. Typically, that expectation is not for medium or higher density retirement accommodation. In part, this is because, traditionally, planning provisions have ignored the unique features of retirement villages. Further, the significant positive effects and community benefits of retirement villages are sometimes not given sufficient weight.
- 86 The NPSUD now requires district plans to provide for this change to existing urban environments. It creates an expectation that "*New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations*" (Objective 4). Further, the NPSUD recognises that amenity values can differ among people and communities, and also recognises that changes can be made via increased and varied housing densities and types, noting that changes are not, of themselves, an adverse effect (Policy 6).

- 87 The importance of this direction is also clearly set out in the Ministry for the Environment's (*MfE*) and the Ministry of Housing and Urban Development's (*HUD*) final decisions report on the NPSUD, which provides that:³⁴

Urban areas are dynamic and complex, continually changing in response to wider economic and social change. The current planning system can be slow to respond to these changing circumstances and opportunities, which can lead to a mismatch between what is enabled by planning and where development opportunity (or demand) exists. This can lead to delays in supply, or incentivise land banking.

- 88 The Enabling Housing Act further supports this need for change by enabling medium density housing to be developed as a minimum in all relevant residential zones. Although the MDRS generally captures retirement villages under the umbrella of residential activities, the framework fails to recognise the unique operational, functional and locational features of retirement villages. Specific provision is therefore necessary to enable much needed retirement housing and care.

- 89 PC14 also needs to provide for change to existing urban environments in order to achieve the intensification envisaged in Policy 3 of the NPSUD. And to respond to the significant issues created by the retirement housing and care crisis, the functional and operational needs of retirement villages also need to be recognised.

Recognise the intensification opportunities provided by larger sites

- 90 As discussed above, sites in existing residential areas that are appropriate for retirement villages are extremely rare, due to the need for sites to be large enough to accommodate all parts of a village and be located in close proximity to community services and amenities. Given large sites are a rare resource, it is important they are developed efficiently to maximise the benefits from their development. This approach is consistent with the enabling intensification approach of the NPSUD.

- 91 As well as providing intensification opportunities, large sites also provide unique opportunities to internalise potential impacts of intensification on neighbours and the neighbourhood. For example, additional height can be located towards the centre of a site without adverse dominance, shading or privacy effects.

- 92 This approach was adopted in the Auckland Unitary Plan, with the residential zones including a policy to enable more efficient use of larger sites.³⁵ The operative district plan contains a similar concept.³⁶ It is proposed that this be further refined to be clearer as to the intent, as outlined in the appendix.

Recognise the unique internal amenity needs of retirement villages

- 93 A key consenting challenge faced by the RVA members is an expectation from council officers that the internal amenity controls used for traditional housing typologies (e.g. outlook, sunlight, privacy, outdoor living spaces, and the like) are appropriate for retirement villages.
- 94 This approach fails to recognise the unique functional and operational needs of retirement villages (discussed above). For example, residents have access to a wide range of communal spaces as well as their individual homes, so their amenity is

³⁴ MfE and HUD, "Recommendations and decisions report on the National Policy Statement on Urban Development" (Wellington, 2020), page 59.

³⁵ H3.3(8), H4.3(8), H5.3(9).

³⁶ Policy 14.2.4.2(vi).

provided by the village as a whole rather than an individual space. This means that internal amenity standards, such as outlook space, do not have the same level of relevance to retirement villages as to typical residential housing. Other factors, such as proximity to communal spaces, may be more relevant to the overall level of amenity experienced by residents.

- 95 This approach also fails to recognise that retirement village operators have a long and positive track record and understanding of what works for their residents. Over many years they have provided high quality environments for their residents – significantly better than typical housing typologies have delivered. Retirement village operators rely on their reputation, which would be quickly diminished by bad publicity. The quality of life provided to residents is therefore paramount to the RVA’s members.
- 96 These points were accepted by the Christchurch Replacement District Plan Independent Hearing Panel:³⁷

[331] Considering costs, benefits and risks, we have decided against imposing internal amenity controls on retirement villages. On this matter, we accept the position of Ryman and the RVA that there is no evidence at this time that there is a problem requiring intervention. We have also borne in mind the caution expressed by Mr Collyns as to the untested impacts of such regulation on the cost of delivering the affordable housing end of the retirement village market. Having said that, we are also mindful that it is at this “affordable” end of the market where residents have the least market power and hence, greatest vulnerability. However, on the basis of Mr Collyns’ evidence, we have assumed that the RVA’s members would act responsibly. Also, we have noted that the Council did not seek to address this topic in its closing submissions and took from that some concurrence with the retirement village sector position as to the lack of any need for regulatory intervention at this time. However, we record that this is a matter where the Council, as plan administrator, has an ongoing plan monitoring responsibility.

- 97 Similarly, a number of internal amenity standards in the Auckland Unitary Plan apply to dwellings, but not to retirement units.³⁸
- 98 It is acknowledged that the operative District Plan contains a range of express exclusions from internal amenity controls for retirement villages. However, the experience in consenting processes is that Council officers remain interested in internal amenity design matters, which has led to interpretation debates. Accordingly, the RVA is proposing that some standards be applied to retirement villages with a supporting new definition of “retirement unit”. This approach is intended to reduce later consenting debates. And, it is aligned with the MDRS standards that apply to residential units with some necessary nuances.
- 99 There are two internal amenity standards in the Enabling Housing Act that the RVA considers require amendment when applied to retirement villages:

99.1 *Outdoor living space:* Retirement villages provide a range of private and communal outdoor areas that can be enjoyed by residents. All of these areas should be counted towards this amenity standard. In addition, retirement village residents tend to spend a significant amount of their recreational time

³⁷ Decision 10 – Residential (part) (and relevant definitions and associated planning maps) (10 December 2015).

³⁸ For example, H4.6.12, H4.6.13 and H4.6.15.

inside, given their sensitivity to temperature extremes. A proportion of these indoor areas should also be counted towards this amenity standard to reflect the actual usage patterns of village residents.

99.2 *Outlook space:* The standard is not workable for all units across a comprehensive site. Furthermore, such a standard is simply not needed. Residents of a village have a much greater degree of choice of 'living rooms' than residents of typical residential dwellings (including communal sitting areas, dining rooms, a library, activity room and chapel). These communal spaces are typically well orientated for daylight and enjoying an outlook into a large and attractive outdoor space.

Provide clear and focused matters of discretion

- 100 The RVA's members have faced significant cost and delay in consenting retirement villages. Often, the process requirements are significantly out of proportion with the adverse effects of the activity, and do not recognise its substantial benefits.
- 101 An example of this issue is excessive and extraneous information requests. Over time, the amount of information that is required to support an application for consent has substantially increased. Council officers often request information that is not relevant to the assessment of the effects of a retirement village proposal, such as information regarding electricity supply, internal lighting, hallway width, planter box size, and outdoor furniture. It is not uncommon to receive unsolicited design change requests from council urban designers. These requests add cost and delay, and distract from the key issues. Council officers have too much discretion to require applicants to provide further information, and have the ability to wield the threat of notification if the requested information is not provided. By way of example, one RVA member received seven requests for further information following lodgement of an application, which resulted in a five month delay in the decision being issued. Another application resulted in four further information requests and a four month delay.
- 102 It is therefore important that matters of discretion for decision-making are clear and focused on the aspects that matter.

Provide appropriately focused notification rules

- 103 Notification is a significant cause of the cost and delay of consenting processes. RMA processes currently provide multiple opportunities for opposition to projects, which is the reason for significant delays in processing consents, and does not ensure good outcomes. Notification is often a cause of much angst for developers. 'NIMBYism' is rife. Self-interested neighbours can create huge delays and disputes for no material environmental benefit.
- 104 Although notification has an important role in the RM system, it must be proportional to the issues at hand. It is only beneficial, and should only be required, where notification is likely to uncover information that will assist the decision-making process. The costs of public notification are too high for it to be required simply for persons to 'be heard'.
- 105 Applications for residential activities that are anticipated in residential zones (i.e. through restricted discretionary activity status) should not be publicly notified. Rather, the time for public participation is at the plan making stage where residential zones and appropriate/inappropriate activities can be clearly identified. This approach aligns with the Enabling Housing Act which precludes public notification for residential proposals.

- 106 Limited notification should remain available as it provides for neighbours to participate when they are likely to be impacted by a next-door development. However, given the significant costs associated with notification, it should only be required where it will benefit the decision-making process. Where an application meets the expectations for development in an area (i.e. through compliance with external amenity standards), there should be no need for limited notification. This approach aligns with the Enabling Housing Act which precludes limited notification for residential proposals that comply with relevant standards.

Use the MDRS as a guideline

- 107 The Enabling Housing Act sets medium density residential standards that guide when residential activities require closer assessment and when limited notification of proposals can be available. The retirement village-specific framework sought by the RVA takes a similar approach (given that retirement villages are a form of development with four or more residential units) with the standards informing matters of discretion and limited notification presumptions.
- 108 The Enabling Housing Act will result in a level of standardisation that will set expectations for the scale of development across the country. The standards have been deemed to 'cover the ground' in relation to the key matters relevant to residential proposals. With some amendments to reflect the specific nature of retirement villages, the RVA considers the standards also set a relevant baseline for identifying standards relevant for the construction of retirement villages.
- 109 Furthermore, it is important PC14 does not inadvertently make retirement village developments more difficult to consent, construct and use than standard residential development. Such an outcome would significantly exacerbate the retirement housing and care crisis that is already resulting in poor wellbeing outcomes for older people.

Provide for retirement villages in commercial and mixed use zones

- 110 The RVA's members generally seek to locate their villages in established, good quality residential areas, as these locations are most suited for residents to 'age in place'. However, due to the lack of suitable sites in existing residential areas and need to respond to the retirement living and care crisis, the RVA's members also operate retirement villages in some commercial and mixed use zones where there is good access to services and amenities (for example, Ryman's village in Northwood).
- 111 It is important to note that the Enabling Housing Act is not limited to residential zones. It also requires councils to ensure district plans provide for intensification of urban non-residential zones through the Enabling Housing Supply plan changes. As noted, Policy 3 of the NPSUD requires PC14 to enable intensification (through building heights and densities) that respond to the location of centres and rapid transit stops.
- 112 City centre, metropolitan centre, neighbourhood centre, local centre and town centre zones in particular provide opportunities for retirement villages. These areas serve the surrounding local communities and provide close access for amenities to residents who are often unable to walk long distances. Residents' wellbeing is improved when social engagement and intergenerational activities are easily accessible. Many general business areas are also located between centres and residential areas and are therefore potentially suitable for retirement villages.
- 113 The RVA notes it has recently agreed some updates to certain commercial zone provisions with the Council in the context of Plan Change 5 (a consent order from

the Environment Court is still pending). The more detailed relief in the **Appendix 1** reflects the agreed changes. The RVA also seeks to develop the matters for consideration when consenting retirement villages in commercial zones. It considers the NPSUD and in particular Policy 3 provide the scope to do that under the Enabling Housing Act.

RETIREMENT VILLAGE-SPECIFIC FRAMEWORK

- 114 To address the issues outlined above, the RVA seeks that PC14 is amended to provide a retirement-village specific framework as follows:

Adoption of the MDRS

- 115 The RVA considers the MDRS must be translated into the District Plan without amendments that read down or alter their interpretation. As noted earlier, in some cases the RVA considers amendments to the MDRS are required to address internal amenity matters to ensure they are workable for retirement villages, but these amendments do not change the intent of the MDRS.
- 116 The changes proposed to the height in relation to boundary standard under the 'Sunlight Access qualifying matter' are opposed for this reason, as the standard has been amended in a manner that is inconsistent with the MDRS. The MDRS are mandatory requirements of the Enabling Housing Act. A failure to make this amendment will give rise to significant interpretation issues and uncertainty when the Plan is applied.
- 117 In addition, the application of the MDRS has been significantly constrained through the retention of the Residential Suburban Zone and the overlay of qualifying matters. The RVA questions the justification for the geographical extent to which qualifying matters (particularly the Low Public Transport Accessibility Area) have been applied to land that may otherwise be appropriate to zone MRZ. It seeks that the extent of the qualifying matter overlays in the Low Public Transport Accessibility Area is either removed, or at least reviewed and refined.
- 118 The RVA considers density should not be used as a proxy to manage public transport infrastructure constraints. The RVA considers a less draconian tool for managing infrastructure constraints is appropriate. It will ultimately be more responsive and efficient. When new transport infrastructure comes online, plan changes will not be needed to amend the qualifying matter overlay and zoning.

Objectives and policies that appropriately recognise the acute need for retirement housing and care in all relevant residential zones

- 119 As detailed in this submission, the rapidly aging population is a significant resource management issue. The objectives and policies of the Plan must enable appropriate accommodation and care for the aging population as follows. The current version goes some way to acknowledging these matters, but can go further, including a more refined policy that recognises the need to provide for a range of housing and care options for older people and to recognise the functional and operational needs of retirement villages. It is noted that District Plan includes Policy 14.2.1.6 for the provision of housing for an ageing population. The RVA supports those aspects of the Policy. However, it considers that on its own Policy 14.2.1.6 is not sufficiently enabling of retirement villages. Greater particularity is needed to enable appropriate accommodation and care for the ageing population in order to give effect to the MDRS and NPSUD, as discussed in greater detail above.

120 The RVA also seeks some more general policies:

120.1 A policy that recognises the need for change over time to the existing character and amenity of neighbourhoods to provide for the diverse and changing needs of the community.

120.2 A more refined policy to enable the efficient use of larger sites; and

120.3 A policy that directs that density standards are to be used as a baseline for the assessment of the effects of developments (noting a 'permitted baseline' is often not applied/useful for retirement villages and other multi-unit developments given the larger sites they occupy).

Rules to enable retirement villages in the MRZ

121 As detailed in this submission, retirement villages need to be provided for as a residential activity and enabled in both the MRZ and HRZ, as follows:

121.1 A rule that permits the use and operation of retirement villages, recognising that this activity is expected and encouraged in residential zones; and

121.2 A rule that regulates the construction of retirement villages as a restricted discretionary activity, recognising that this activity is anticipated in residential zones with limited matters requiring assessment.

122 The RVA considers retirement villages are required to be restricted discretionary activities under the MDRS as they require "*the construction and use of 4 or more residential units on a site*". It is noted that PC14 includes Rules 14.6.1.1 P10 and 14.6.1.3 RD4 in the HRZ which regulate the use and operation of a retirement village as a permitted activity and the construction of retirement villages as a restricted discretionary activity. The RVA supports this approach and considers the same approach must also apply in the MRZ, which currently regulates retirement villages as a restricted discretionary activity (14.5.1.3 RD2). The RVA considers restricted discretionary activity status is inappropriate for the use/operation of retirement villages as that status does not recognise that retirement villages are a residential activity that is appropriate in residential zones. The RVA seeks a permitted activity rule for the use and operation of retirement villages in the MRZ.

Tailored matters of discretion for retirement villages

123 As detailed in this submission, retirement villages are different to typical residential dwellings, and therefore do not necessarily fit in with the typical controls imposed on residential developments. The operative Plan already acknowledges these differences to an extent. However, as explained the current assessment criteria are insufficiently clear and do not enable positive effects to be considered. There are also inconsistencies in the regime across different residential and commercial zones. It is therefore critical to provide more tailored and fit for purpose retirement village matters of discretion, as follows:

123.1 Recognise the positive effects of retirement villages;

123.2 Focus effects assessments on exceedances of relevant standards, effects on the safety of adjacent streets or public open spaces, and effects arising from the quality of the interface between the village and adjacent streets or public open spaces to reflect the policy framework within the Enabling Housing Act. A degree of control over longer buildings is also acknowledged as appropriate; and

123.3 Enable the need to provide for efficient use of larger sites and the functional and operational needs of retirement villages to be taken into account when assessing effects.

- 124 In the HRZ, the RVA opposes the additional matters of discretion, which are broad and not sufficiently focused on the effects of retirement villages that should be regulated in line with the MDRS. In addition, the matters of discretion do not allow for consideration of the positive effects of retirement villages, the functional and operational needs of retirement villages, and the need to provide for efficient use of large sites.

Proportionate notification

- 125 As noted, a key consenting issue for retirement village operators across the country relates to the delays, costs and uncertainties associated with notification processes. Consistent with the direction of the Enabling Housing Act relating to four or more residential units, applications for retirement villages in the relevant residential zones should not be publicly notified based on density effects. In addition, limited notification should only be used where a retirement village application proposes a breach of a relevant density standard that manages external amenity effects and the relevant effects threshold in the RMA is met.

- 126 It is noted that PC14 precludes public and limited notification of retirement villages in the HRZ (14.6.1.3 RD4). In the MRZ, PC14 precludes the public and limited notification of an application for the construction and use of four or more residential units per site. As noted above, the RVA supports appropriately focused notification rules, and considers that proposals for the construction of retirement villages in the MRZ should also be precluded from public and limited notification.

Clear, targeted and appropriate development standards

- 127 The RVA considers the development standards for retirement villages should reflect the MDRS, except where amendments are necessary to reflect the particular characteristics of retirement villages. The height, height in relation to boundary, setbacks and building coverage standards should therefore reflect the MDRS. The outdoor living space, outlook space, windows to street and landscaped area standards should generally reflect the MDRS with some amendments.
- 128 The RVA supports the explicit exclusion of residential units in a retirement village from various built form standards in the MRZ (subject to the addition of a 'retirement unit' definition). The RVA seeks additional amendments to the proposed density standards in the MRZ, such as to Built Form Standard 14.5.2.8, to ensure that all development standards are fit for purpose for retirement villages.
- 129 The RVA also notes that a number of development standards have been inserted in PC14 that go beyond the scope of, or are inconsistent with, the MDRS. The RVA seeks the removal of those standards for consistency with the Enabling Housing Act.
- 130 The RVA also seeks to ensure the proposed standards are consistent with Policy 3 of the NPSUD, as a mandatory requirement of the Enabling Housing Act. For example, in the HRZ, Rule 14.6.2.1 is inconsistent with Policy 3, which requires heights of at least six storeys to be enabled within a walkable catchment of existing and planned rapid transit stops and the edge of city and metropolitan centre zones.

Providing for retirement villages in commercial and mixed-use zones

- 131 As discussed above, commercial and mixed-use zones enable mixed uses, including residential activities, and may contain suitable sites for retirement villages. For this

reason, the RVA has been involved in Proposed Plan Change 5, seeking that fit for purpose retirement village planning provisions are applied in appropriate commercial zones. The RVA acknowledges the productive engagement and discussions held with the Council throughout the PC5 process.

- 132 The context of PC14 is of course different to PC5. As noted by the Council in its section 32 evaluation, the specific issues that PC14 seeks to address in relation to the commercial chapter of the District Plan are all directly related to giving effect to Policy 3 of the NPSUD.³⁹ The overarching goal is to enable intensification (particularly housing) within and around these areas.
- 133 The RVA wishes to ensure that PC14 provides for this intensification, including by applying fit for purpose retirement village planning provisions in all appropriate commercial and mixed-use zones, similar to those proposed for residential zones. That said, it acknowledges that additional controls in commercial zones are necessary to preserve land if its needed to maintain the commercial viability of the centres (eg, ground floor restrictions).

Tree canopy and financial contributions

- 134 The RVA opposes PC14's introduction of Chapter 6.10A Tree Canopy Cover and Financial Contributions entirely. Tree canopy cover is not a requirement of the MDRS. It is therefore inconsistent with the Enabling Housing Act. Landscaping requirements are regulated under other standards. Such requirements will slow down, not speed up intensification. As the additional tree canopy provisions are inconsistent with the MDRS. The RVA seeks that the corresponding financial contribution provisions for tree canopy cover are also deleted.

DECISION SOUGHT

- 135 The RVA seeks:
- 135.1 Amendments to PC14 to address the matters set out above;
- 135.2 Without limiting the generality of the above, the specific relief set out in **Appendix 1**; and
- 135.3 Any alternative or consequential relief to address the matters addressed in this submission.
- 136 The RVA wishes to be heard in support of this submission.
- 137 If others make a similar submission, the RVA will consider presenting a joint case with them at a hearing

³⁹ Section 32 Evaluation, Housing and Business Choice – Commercial and Industrial Sub-Chapters Evaluation Report, Part 4, page 1.

Signed for and on behalf of Retirement Villages Association of New Zealand Incorporated
by John Collyns

John Collyns, Executive Director
12 May 2023

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APPENDIX 1 – SPECIFIC SUBMISSION POINTS AND RELIEF SOUGHT BY THE RVA

Provisions	Submission Position	Reason for Submission	Relief Sought
Chapter 2 – Abbreviations and Definitions			
Definitions – Retirement Unit	Oppose in Part	To give effect to its submissions on PC14, the RVA considers that a 'retirement unit' definition is required, as this term has proposed to be included in multiple provisions in the tables below. This definition is required to acknowledge retirement units differ from typical residential units in terms of layout and resident amenity needs. Many units in retirement villages would not qualify as "residential units", as do not have cooking/bathing facilities. Without a new definition, the planning regime for these units will be unclear and will cause complexity in consenting processes.	<p><i>The RVA seeks to add the following 'retirement unit' definition to PC14:</i></p> <p><u>Retirement Unit</u></p> <p><u>Means any unit within a retirement village that is used or designed to be used for a residential activity (whether or not it includes cooking, bathing, and toilet facilities). A retirement unit is not a residential unit.</u></p> <p>Consequential amendments to the plan to ensure no unintended consequences arise from excluding retirement units from the definition of "residential unit".</p>
Definitions – Elderly Person's Housing Unit and Older Person's Housing Unit	Oppose in part	The RVA supports the differentiation between typical residential units and the housing units for older persons. However, the RVA considers it is important that these definitions are not confused with 'retirement village' or 'retirement unit'. PC14 needs to clearly acknowledge the differences in terms of layout and amenity needs between retirement villages and	<p><i>The RVA seeks that the definitions of Elderly Person's Housing Unit and Older Person's Housing Unit are amended to clarify that such units are not part of retirement villages.</i></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		either the term Elderly or Older Person's housing unit.	
Definitions – Retirement Village	Oppose in part	To give effect to its submissions on PC14, the RVA considers that the existing 'retirement village' definition should be replaced to ensure consistency with the definition provided in the National Planning Standards used across the country.	<p><i>The RVA seeks to add the following 'retirement village' definition to PC14, and delete the existing Retirement Village definition:</i></p> <p><u>Retirement Village</u></p> <p><u>Means a comprehensive residential complex or facilities used to provide residential accommodation for people who are retired and any spouses or partners of such people. It may also include any of the following for residents within the complex: recreation, leisure, supported residential care, welfare and medical facilities (inclusive of hospital care) and other non-residential activities.</u></p>
Definitions – Care home within a retirement village	Oppose	As a result of its submissions on PC14, the RVA considers that the National Planning Standards definition of 'retirement village' appropriately covers comprehensive residential complexes and facilities, including the provision of residential care, and so a separate definition for care homes within a retirement village is not required.	<i>The RVA seek that the definition of 'Care-home within a retirement village' is deleted.</i>

Provisions	Submission Position	Reason for Submission	Relief Sought
Definitions – Hospital within a retirement village	Oppose	As a result of its submissions on PC14, the RVA considers that the National Planning Standards definition of 'retirement village' appropriately includes comprehensive residential complexes and facilities (including hospital care) and so a separate definition for a 'hospital within a retirement village' is not required.	<i>The RVA seek that the definition of 'hospital within a retirement village' is deleted.</i>
Chapter 3 – Strategic Directions			
Objective 3.3.4 – Housing bottom lines and choice	Support	The RVA supports Objective 3.3.4 as it aligns with Policy 7 of the NPSUD and recognises the importance of providing a range of housing opportunities for Christchurch's diverse population.	<i>Retain Objective 3.3.4 as notified.</i>
Objective 3.3.7 – Well-functioning urban environment	Support in part	<p>The RVA supports Objective 3.3.7 insofar as it reflects Objective 1 of the MDRS, but seeks that the additional inserted text should be deleted to the extent it is inconsistent with the MDRS for example:</p> <p>3.3.7a.(i): the requirements to provide 'a distinctive legible urban form' and 'strong sense of place' are vague and will create interpretation issues as neither term is defined in the District Plan.</p> <p>3.3.7a.(i)B: requiring larger scale development to be able to be "visually absorbed" in order to manage the form and</p>	<p><i>The RVA seeks to amend Objective 3.3.7 as follows to remove provisions that have the potential to limit the intensification intent of the Enabling Housing Act:</i></p> <p>a. 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;</p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		<p>scale of development is inconsistent with the MDRS. The RVA also submits that, for residential zones, the reference to 'more sensitive environments' should be amended to make it clear that MDRS development is only restricted in areas where qualifying matters apply.</p> <p>In terms of Paragraph E, it is noted that retirement villages may require greater height and density in all areas of the city in order to allow older people to 'age in place' and to ensure large sites are used efficiently, which is already acknowledged by the existing Plan provisions.</p> <p>The RVA supports the intent of 3.3.7a.ii to align with Policy 6 NPSUD, but suggests amendments to recognise and make clear that changes to amenity values are not, of themselves, an adverse effect.</p>	<p>including by recognising and providing for:</p> <p>i. Within commercial and residential zones, <u>high quality design a distinctive, legible urban form and strong sense of place</u>, expressed through:</p> <p>A.—Contrasting building clusters within the cityscape and the wider perspective of the Te-Poho-o-Tamatea/the Port Hills and Canterbury Plains; and</p> <p>B.—Appropriate scale, form and location of buildings when viewed in context of the city's natural environment and significant open spaces, providing for:</p> <p>i.—Larger scale development where it can be visually absorbed within the environment' and</p> <p>ii.—Lower heights and design controls for development</p>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<p>located in more sensitive environments;</p> <p>C. The pre-eminence of the city centre built form, supported by enabling the highest buildings;</p> <p>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;</p> <p>E. The largest scale and density of development, outside of the city centre, provided within and around town centres, and lessening scale for centres lower in the hierarchy <u>unless a specific need for scale and density exists</u>;</p> <p>ii. Development and change over time to the planned urban environment <u>is anticipated</u>, including to amenity values, in response to the diverse and changing needs of people,</p>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<p>communities and future generations. <u>This may detract from current amenity values experienced by some people. These changes are not, of themselves, an adverse effect;</u></p> <p>iii. The cultural traditions and norms of Ngāi Tahu manawhenua; and</p> <p>iv. The benefits of urban environments that support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.</p>
3.3.8 – Objective – Urban growth, form and design	Support in part	<p>The RVA supports the recognition of the need to increase housing opportunities to meet RPS intensification targets. However, it seeks amendments to Objective 3.3.8 to better align with the MDRS and the NPSUD, including:</p> <ul style="list-style-type: none"> - As 3.3.8a(i) is a key urban form objective, the RVA suggests amendments to are necessary to give effect to Policy 6 of the NPSUD 	<p><i>The RVA seeks to amend Objective 3.3.7 as follows:</i></p> <p>ii. Has its areas of special character and amenity value identified and their specifically recognised values appropriately managed, <u>recognising that the planned urban form and associated amenity values will change over time.</u></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		and recognise that amenity values are anticipated to change over time.	
3.3.10 – Natural and cultural environment	Oppose	<p>The RVA opposes the requirement in 3.3.10a.ii.E. to 'maintain and enhance' the city's biodiversity and amenity through tree cover.</p> <p>The RVA considers this direction could be highly limiting of residential activity and contrary to the intention of the NSPUD and the Enabling Housing Act. Further, it is not clear why:</p> <ul style="list-style-type: none"> - This policy only applies to areas of residential activity; and - It is unclear why tree canopy has been identified for stronger protection language than the other items. The other items in 3.3.10a.ii are simply listed to be 'identified and appropriately managed'. 	<i>Amend 3.3.10a.ii.E. for consistency with the Enabling Housing Act or delete.</i>
Chapter 6.10A – Tree Canopy Cover and Financial Contributions			
Tree canopy cover in areas of residential activity	Oppose	The RVA do not consider that this policy and rule suite is aligned with the intent of the NPSUD and Enabling Housing Act which is to enable intensification and remove overly restrictive planning provisions. The requirement for any residential	<i>Delete chapter 6.10A and rely on the MDRS landscaping provisions.</i>

Provisions	Submission Position	Reason for Submission	Relief Sought
		<p>development in the Christchurch City area to provide a minimum tree canopy cover of 20% of the development site area is considered to be very restrictive to any retirement village proposal. The MDRS also already provide a landscape planting standard and the chapter 6.10A proposal is much more restrictive than that.</p> <p>The RVA considers the (potentially minimal) improvements in heat island effects, stormwater runoff and carbon sequestration from this proposal can in no way justify the highly limiting and negative effects on residential development from this proposal. There are significantly more effective and efficient means of achieving the desired outcomes.</p>	
Chapter 7 – Transport			
Standard 7.4.3.7 (b) – Access design	Oppose in part	The RVA opposes this standard in part as retirement village proposals have different design and access needs to typical residential units, and it may not be appropriate to enable pedestrian access.	<i>The RVA seek an amendment to Standard 7.4.3.7(b) to exclude retirement units from this standard.</i>
Standard 7.4.3.8 (h) – Vehicle crossings and	Oppose in part	The RVA oppose this standard in part as retirement village proposals have different	<i>The RVA seek an amendment to Standards 7.4.3.8(h) and 7.4.3.13 that</i>

Provisions	Submission Position	Reason for Submission	Relief Sought
7.4.3.13 – Co-Location of Vehicle Crossings		design and vehicle crossing needs to typical urban development.	<i>excludes retirement villages from these standards.</i>
Chapters 14.1 – 14.3 – Residential – Introduction / Objectives and Policies			
Objective 14.2.1 – Housing Supply	Support in part	<p>The RVA supports Objective 14.2.1 to the extent it aligns with the intent of the Enabling Housing Act. However, it opposes only enabling housing that is consistent with Objectives 3.3.4(a) and 3.3.8. Objective 3.3.8 in particular is inconsistent with the Enabling Housing Act.</p> <p>The reference to meeting the diverse and changing needs of the community is supported.</p>	<p><i>Either amend Objective 3.3.8 for consistency with the intent of the Enabling Housing Act and NPSUD as sought above: or</i></p> <p><i>Amend Objective 14.2.1 to delete the reference to Objective 3.3.8.</i></p>
Policy 14.2.1.1 – Housing distribution and density	Support	The RVA supports Policy 14.2.1.1 as it is aligned with the intent of the NPSUD and Enabling Housing Act which is to provide for intensification.	Retain Policy 14.2.1.1 as notified.
Table 14.2.1.1a	Oppose in part	The RVA considers that specific acknowledgement of retirement villages is required in the Medium Density Residential Zone and High Density Residential Zone given the suitability of these zones for retirement villages and the important role	Amend zone descriptions to include reference to retirement villages.

Provisions	Submission Position	Reason for Submission	Relief Sought
		retirement villages have in accommodating ageing populations in the community.	
Policy 14.2.1.6 – Provision of housing for an ageing population	Support in part	The RVA generally supports the intent of Policy 14.2.1.6, but seeks additional changes to reflect the recent outcomes of Plan Change 5 and to better reflect the intentions of the Enabling Housing Act and consistency with the regime the RVA has sought with other Tier 1 councils across the country.	<p>Amend Policy 14.2.1.6 as follows:</p> <p><i>14.2.1.86 Policy - Provision of housing for an aging population</i></p> <p><i>a. Provide for a diverse range of independent housing options that are suitable for the particular needs and characteristics of older persons throughout residential areas.</i></p> <p><i>b. Provide for comprehensively designed and managed, well-located, higher density accommodation options and accessory services for older persons and those requiring care or assisted living, throughout all residential zones.</i></p> <p><i>c. Recognise that housing for older persons can require higher densities than typical residential development, in order to be affordable and, where required, to enable efficient provision of assisted living and care services.</i></p> <p><i>d. Recognise that housing for the older person provide for shared spaces, services and facilities and enable affordability and the efficient provision of assisted living and care services.</i></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<i>Note: This policy also implements Objective 14.2.2</i>
Objective 14.2.3 – MDRS Objective 2	Support	The RVA supports Objective 14.2.3 as it aligns with Objective 2 of the MDRS.	<i>Retain Objective 14.2.3 as notified.</i>
Policy 14.2.3.1 – MDRS Policy 1	Support	The RVA supports Policy 14.2.3.1 as it aligns with Policy 1 of the MDRS.	<i>Retain Policy 14.2.3.1 as notified.</i>
Policy 14.2.3.2 – MDRS Policy 2	Support	The RVA supports Policy 14.2.3.2 as it aligns with Policy 2 of the MDRS.	<i>Retain Policy 14.2.3.2 as notified.</i>
Policy 14.2.3.3 – MDRS Policy 5	Support	The RVA supports Policy 14.2.3.3 as it aligns with Policy 5 of the MDRS.	<i>Retain Policy 14.2.3.3 as notified.</i>
Policy 14.2.3.4 – MDRS Policy 3	Support	The RVA supports Policy 14.2.3.4 as it aligns with Policy 3 of the MDRS.	<i>Retain Policy 14.2.3.4 as notified.</i>
Policy 14.2.3.5 – MDRS Policy 4	Support	The RVA supports Policy 14.2.3.5 as it aligns with Policy 4 of the MDRS.	<i>Retain Policy 14.2.3.5 as notified.</i>
Policy 14.2.3.6 – Framework for building height in medium and high density areas	Support	The RVA supports Policy 14.2.3.6 as it is aligned with the intent of the NPSUD and Enabling Housing Act which is to provide for intensification.	<i>Retain Policy 14.2.3.6 as notified.</i>
Policy 14.2.3.7 – Management of increased building heights	Oppose	The RVA opposes Policy 14.2.3.7 as it considers the wording is quite limiting in a resource consent process as it appears to need to satisfy all criteria listed. For	<i>Delete Policy 14.2.3.7.</i>

Provisions	Submission Position	Reason for Submission	Relief Sought
		example retirement villages may be appropriate in locations that are not within walking distance of public or active transport.	
Objective 14.2.5 – High quality residential environments	Support in part	The RVA supports Objective 14.2.5 to the extent it aligns with the intent of the NPSUD and Enabling Housing Act, but seeks amendments to better align with Objective 2 of the MDRS.	<i>Amend Objective 14.2.5 as follows:</i> High quality, sustainable , residential neighbourhoods which are well designed, to reflect to respond to <u>the planned urban character</u> and the Ngāi Tahu heritage of Ōtautahi.
Policy 14.2.5.1 – Neighbourhood character, amenity and safety	Oppose	<p>The RVA considers that the proposed Policy 14.2.5.1 does not give effect to the NPSUD or the Enabling Housing Act. The detailed policy direction on planting areas, design features and glazing is not enabling of residential development. The proposed management of form and design of development is also inconsistent with the MDRS.</p> <p>Further, these controls are not appropriate for developments such as retirement villages. As set out above, retirement villages have functional and operational needs that make standard residential building design controls inappropriate.</p>	<i>The RVA seeks either to exclude retirement villages from Policy 14.2.5.1, or amend for consistency with the MDRS and remove provisions that have the potential to refine / limit the intensification provisions of the Enabling Housing Act.</i>

Provisions	Submission Position	Reason for Submission	Relief Sought
Policy 14.2.5.2 – High quality, medium density residential development	Oppose in part	The RVA seeks amendments to Policy 14.2.5.2 to better align with Objective 2 of the MDRS. The use of 'reflects the planned urban built character' represents a more restrictive policy than intended by Objective 2 which requires a 'response' to the planned urban built character.	<p><i>Amend Policy 14.2.5.2(a) as follows:</i></p> <p>Encourage innovative approaches to comprehensively designed, high quality, medium density residential development, which is attractive to residents, responsive to housing demands, and reflects <u>responds to</u> the planned urban built character of an area...</p> <p><i>Amend Policy 14.2.5.2(a)(vi) as follows:</i></p> <p>vi. recognising that built form standards may not always support the best design and <u>enable the</u> efficient use of a site for medium density development, particularly for larger sites where opportunities for intensification exist.</p>
Policy 14.2.5.3 – Quality large scale developments	Oppose	<p>The RVA opposes policy controls which seek to manage the internal amenity of retirement villages. Retirement village operators are best placed to understand the needs of its residents. Internal amenity matters are also covered by the MDRS provisions. Council cannot seek to impose more stringent requirements.</p> <p>The policy also fails to recognise the functional and operational requirements of</p>	<i>Amend Policy 14.2.5.3 to be clear the policy does not apply to retirement villages. A retirement-village specific policy and rule framework, as proposed below will encourage high-quality retirement village developments.</i>

Provisions	Submission Position	Reason for Submission	Relief Sought
		retirement villages, for example by clause vi) referring to public through connections, which may not be appropriate for the safety of village residents. The RVA also considers Policy 14.2.5.3 seeks to manage the form, scale and design of development in a manner that is inconsistent with the MDRS and with Policy 5 of the Enabling Housing Act.	
Policy 14.2.5.5 Assessment of wind effects	Oppose	The RVA opposes this policy control which seeks to manage adverse wind effects. The policy as notified is too subjective, including terms such as 'maintain the comfort' which in a resource consent application assessment context requires a very broad analysis. These changes do not support and are not consequential on the MDRS or Policy 3.	<i>Delete Policy 14.2.5.5</i>
Objective 14.2.6 – Medium Density Residential Zone	Support in part	The RVA supports Objective 14.2.6 in part but seeks amendments to better align with the MDRS, which anticipates a variety of housing types with a mix of densities. It is noted that "MDRS scale development" is potentially confusing, as the MDRS contain a range of provisions, including objectives and policies. The MDRS also seek to provide for development that does not meet permitted standards (MDRS policy 5).	<i>Amend Objective 14.2.6 as follows:</i> Medium density residential areas of predominantly including MDRS scale development of three- or four-storey buildings, including semi-detached and terraced housing and low-rise apartments, with innovative approaches to comprehensively designed residential

Provisions	Submission Position	Reason for Submission	Relief Sought
			developments, whilst providing for other compatible activities.
Policy 14.2.6.1 – MDRS Policy 1	Support	The RVA supports Policy 14.2.3.1 as it aligns with Policy 1 of the MDRS.	<i>Retain Policy 14.2.6.1 as notified.</i>
Objective 14.2.7 and Policies 14.2.7.1 and 14.2.7.2	Oppose	The RVA opposes the proposed objectives and policies as they do not adequately reflect Policy 3 of the NPSUD.	<i>Amend objective 14.2.7 and policies 14.2.7.1 and 14.2.7.2 to be in line with Policy 3 NPSUD.</i>
Policies 14.2.7.4 and 14.2.7.5	Oppose in part	The RVA considers that the drafting of these policies does not adequately reflect the updated terminology used in the NPSUD and suggests some amendments to the text. At present the language appears to prefer particular housing typologies and is unduly narrow.	<i>Amend policies 14.2.7.4 and 14.2.7.5 as follows: Enable the development of 6-story-multi-storey flats and apartments in, residential buildings...</i>
Policy 14.2.7.6 – High Density Residential Development	Oppose	The RVA opposes the requirements under (ii) and (iii) which restrict the form, scale and design of developments in a manner which is inconsistent with the MDRS, which does not require site amalgamation or building bulk to be located towards the frontage of sites.	<i>Delete Policy 14.2.7.6.</i>
Policy 14.2.8.3 – Development density	Support in part	The RVA supports Policy 14.2.8.3 as it is aligned with the intent of the NPSUD and Enabling Housing Act which is to provide for	<i>Amend Policy 14.2.8.3(d) as follows:</i>

Provisions	Submission Position	Reason for Submission	Relief Sought
		intensification. However, the requirement in 14.2.8.3(d) to encourage higher density housing to be located with ready access to facilities is considered too restrictive.	d. <u>Where practicable</u> encourage higher density housing to be located to support, and have ready access to, commercial centres, community facilities, public transport and open space; and to support well connected walkable communities.
Residential Zones – Policies	New policy sought	<p>It is anticipated that this policy will be applied to all relevant residential zones.</p> <p>The RVA considers that a new policy is required to give effect to the direction under the NPSUD that acknowledges amenity values evolve over time, and that expectations for existing amenity must also evolve in order to enable necessary housing.</p>	<p><u>New Policy Changing communities</u></p> <p><u>To provide for the diverse and changing residential needs of communities, recognise that the existing character and amenity of the Medium Density Residential Zone will change over time to enable a variety of housing types with a mix of densities.</u></p>
Residential Zones – Policies	New policy sought	<p>The RVA considers that it is appropriate to enable the density standards to be utilised as a baseline for the assessment of the effects of developments as noted in the submission above.</p> <p>It is anticipated that this policy will be applied to all relevant residential zones. The RVA notes the deletion of Policy</p>	<p><i>The RVA seeks that a new policy is inserted in the relevant residential zones that enables the density standards to be utilised as a baseline for the assessment of the effects of developments.</i></p> <p><u>New Policy Role of density standards</u></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		14.2.8.2 Amenity standards and considers that while the deletion of that policy is appropriate this new policy appropriately aligns with the direction of the NPSUD to enable density and to enable development that meets the relevant Density standards.	<u>Enable the density standards to be utilised as a baseline for the assessment of the effects of developments other than in areas where the Plan provides location-specific density standards.</u>
Residential Zone Rules – Chapters 14.4, 14.5, 14.6, 14.9 and 14.12			
Residential Suburban Zone – General – Low Public Transport Accessibility qualifying matter	Oppose	<p>The RVA opposes a relevant residential zone not applying the MDRS standards on account of the zone being a “qualifying matter” because of the Low Public Transport Accessibility qualifying matter, which is beyond the scope of the Enabling Housing Act.</p> <p>The RVA also opposes the applicability of the qualifying matter to retirement villages, who, due to age and mobility constraints, do not use public transport in the same manner as other demographics. Suitable sites in residential areas are rare and therefore reductions in the opportunities to use sites for retirement villages will not meet the intensification requirements of the Enabling Housing Act.</p>	<i>The RVA seeks the deletion of the Low Public Transport Accessibility qualifying matter and the subsequent upzoning of those areas of Residential Suburban Zone. In the alternative, the RVA seeks the provision of a retirement village-specific regime in the RSZ, that applies the MDRS.</i>

Provisions	Submission Position	Reason for Submission	Relief Sought
Medium Density Residential Zone – Rule 14.5.1.1 (P1)	Support in part	<p>The RVA supports Rule 14.5.1.1 (P1) as it permits all residential activities.</p> <p>However, the RVA considers retirement villages as a land use activity must be provided for as a permitted activity (and the construction of retirement villages provided for as a restricted discretionary activity, as detailed in response to 14.5.1.3 (RD2)), recognising that retirement villages as a permitted activity provide substantial benefit in residential zones, while having minimal effects on surrounding activities.</p>	<p><i>The RVA seeks that a new Rule is inserted in the Medium Density Residential Zone chapter that permits retirement villages as an activity.</i></p> <p><u>MRZ-RX Retirement Villages</u></p> <p><u>Activity status: PER</u></p> <p>1. <u>Any retirement village.</u></p> <p><u>Activity status when compliance not achieved: N/A</u></p>
Medium Density Residential Zone – Rule 14.5.1.3 (RD2)	Support in part	<p>While the RVA supports the inclusion of a retirement village specific rule, it considers that amendments to the retirement village rule are required to give effect to the MDRS and the NPSUD, as discussed in greater detail in the submission above. The changes will also address the experience of operators implementing the prior regime which relied on general rule 14.5.1.3. This rule is insufficiently clear and does not enable positive effects to be considered in consent assessments. In particular, the direction to consider whether a retirement village “...development, while bringing change to existing environments, is appropriate to its context” has caused</p>	<p><i>The RVA seeks to amend Rule 14.5.1.3 (RD2) to provide for the construction of retirement villages provided as a restricted discretionary activity and to remove reference to Rule 14.15.9, and include a set of focused matters of discretion that are applicable to retirement villages, to provide for and acknowledge the differences that retirement villages have from other residential activities.</i></p> <p>Rule 14.5.1.3 (RD2)</p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		<p>significant interpretation challenges (eg Ryman Park Terrace), leading to delays and uncertainty in consenting processes</p> <p>The RVA considers only the construction of buildings for retirement villages that should be a restricted discretionary activity. The use of land for a retirement villages should be a permitted activity as these are low-impact residential activities that provide substantial benefit in residential zones including enabling older people to remain in familiar community environments for longer (close to family and support networks), whilst also freeing up a number of dwellings located in surrounding suburbs.</p> <p>Further, the RVA considers that the construction of retirement villages should have their own set of focused matters of discretion (so to provide for and acknowledge the differences that retirement villages have from other residential activities).</p> <p>The RVA considers the matters of discretion applicable to retirement villages need to appropriately provide for / support the efficient use of larger sites for retirement villages, and the functional and operational needs of the retirement village.</p> <p>Furthermore, it is considered that the establishment of, or addition/external</p>	<p><u>Construction or alteration of or addition to any building or other structure for a retirement villages</u></p> <p><u>Matters for discretion</u></p> <p><u>The exercise of discretion in relation to Rule 14.5.1.3 (RD2) is restricted to the following matters:</u></p> <ol style="list-style-type: none"> <u>1. The extent and effects arising from exceeding any of the relevant built form standards (both individually and cumulatively).</u> <u>2. The effects of the retirement village on the safety of adjacent streets or public open spaces.</u> <u>3. The effects arising from the quality of the interface between the retirement village and adjacent streets or public open spaces.</u> <u>4. The extent to which articulation, modulation and materiality addresses visual dominance effects associated with building length.</u>

Provisions	Submission Position	Reason for Submission	Relief Sought
		<p>alteration to an accessory building to a retirement village should be provided for under the same rule (with the retirement village specific matters of discretion applying).</p> <p>The RVA considers that applications for the construction of a retirement village activities should be precluded from being publicly notified in the Medium Density Residential Zone, as the activity is anticipated in this zone. The RVA also considers that, in accordance with Schedule 3A (5)(2) of the Enabling Housing Act, a retirement village that is compliant with the relevant standards should also be precluded from limited notification.</p> <p>This approach aligns with the MDRS which precludes public and limited notification for residential developments that comply with relevant standards.</p>	<p>5. <u>The matters in 14.2.1.6, 14.2.3.1, 14.2.3.2, 14.2.3.3, 14.2.3.4, 14.2.3.5, 14.2.3.6, 14.2.3.7, 14.2.5.1, 14.2.5.2, 14.2.5.3, 14.2.5.4, 14.2.6.1, 14.2.7.1, 14.2.7.6, 14.2.8.3 and the proposed new policies as inserted.</u></p> <p>6. <u>The extent to which service, storage and waste management spaces are provided for on site;</u></p> <p>7. <u>The positive effects of the construction, development and use of the retirement village.</u></p> <p><u>For clarity, no other rules or matters of discretion relating to the effects of density apply to buildings for a retirement village.</u></p> <p><u>Notification:</u></p> <p><u>An application for resource consent associated with a retirement village made in respect of Rule 14.5.1.3 (RD2) is precluded from being publicly notified.</u></p> <p><u>An application for resource consent associated with a retirement village made in respect of Rule 14.5.1.3 (RD2)</u></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<u>that complies with the relevant external amenity standards is precluded from being limited notified.</u>
Medium Density Residential Zone – Built Form Standard 14.5.2.1	Oppose	The RVA opposes 14.5.2.1 on the basis that this standard is not required under the MRDS, and it will create confusion to include advice notes as a built form standard.	<i>Delete 14.5.2.1.</i>
Medium Density Residential Zone – Built Form Standard 14.5.2.2	Oppose in part	<p>The RVA supports Standard 14.5.2.2 insofar as it reflects the 'landscaped area' requirement of the MDRS.</p> <p>However, it is considered that the standard should be amended to specifically provide for retirement units also.</p> <p>Further, the RVA strongly opposes the requirement for any residential development to provide a tree canopy cover of 15-20% of the development site area. The MDRS do not address tree canopy cover and this requirement is likely to significantly limit new residential developments.</p>	<p><i>The RVA seeks to amend Standard 14.5.2.2 as follows, to provide for retirement units and to remove the requirement for residential developments to provide tree canopy cover:</i></p> <p>14.5.2.2 Landscaped area and tree canopy cover</p> <p>a. A residential unit <u>or retirement unit</u> at ground floor level must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</p> <p>b. The landscaped area may be located on any part of the development site, and</p>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<p>does not need to be associated with each residential unit <u>or retirement unit</u>.</p> <p>e. ... [remove remainder of standard..]</p> <p>d. ...</p> <p>e. ...</p> <p>f. ...</p> <p>...</p>
Medium Density Residential Zone – Built Form Standard 14.5.2.3	Support	The RVA supports Standard 14.5.2.3 as it aligns with the height standard of the MDRS.	<i>Retain Standard 14.5.2.3 as notified.</i>
Medium Density Residential Zone – Built Form Standard 14.5.2.4	Support in part	The RVA supports Standard 14.5.2.4 to the extent it aligns with the building coverage standard of the MDRS, however, amendments are required to clarify the language to make the standard consistent by using defined terms.	<p><i>Amend Standard 14.5.2.4 as follows:</i></p> <p><i>a. ...</i></p> <p><i>b. For retirement villages, the percentage coverage by buildings <u>building coverage</u> shall be calculated over the net site area of the entire complex or group,</i></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<p><i>rather than over the net area of any part of the complex or group.</i></p> <p>C. ...</p>
Medium Density Residential Zone – Built Form Standard 14.5.2.5	Support	<p>The RVA supports Standard 14.5.2.5 as it aligns with the outdoor living space standard of the MDRS.</p> <p>Further, the RVA recognises and support that Council have identified that outdoor living space does not have the same level of relevance to retirement villages as to typical residential housing and have excluded residential units in a retirement village from this standard. That said, the RVA considers an alternative standard should be provided using the “retirement unit” definition to enable greater certainty when consenting villages and for general consistency with the MDRS.</p>	<p><i>Retain Standard 14.5.2.5 as notified with the exclusion of retirement villages, or amend to include the retirement unit specific carve out as follows:</i></p> <p>f) <u>For retirement units, standard 14.5.2.5a and 14.5.2.5b apply with the following modifications:</u></p> <ul style="list-style-type: none"> i. <u>The outdoor living space may be in whole or in part grouped cumulatively in 1 or more communally accessible location(s) and/or located directly adjacent to each retirement unit; and</u> ii. <u>A retirement village may provide indoor living spaces in one or more communally accessible locations in lieu of up to 50% of the required outdoor living space.</u>

Provisions	Submission Position	Reason for Submission	Relief Sought
Medium Density Residential Zone – Built Form Standard 14.5.2.6	Oppose in part	<p>The RVA supports Standard 14.5.2.6 and the height in relation to boundary provisions to the extent it is consistent with the MDRS.</p> <p>However, the RVA considers that the wording proposed must be amended to accurately reflect the wording of the MDRS. The RVA submits that the MDRS are mandatory requirements of the Enabling Housing Act.</p> <p>The RVA also seeks amendments so that height restrictions in relation to boundaries do not apply adjoining open space and recreation zones, commercial and mixed use zones, and special purpose zones. Similar considerations apply to these zones as to road boundaries, in that overlooking and amenity effects at these boundaries are likely to be minor at most. Including boundaries with these zones will provide further development possibilities with minimal adverse effects.</p> <p>Such exclusions should be integrated within the standard to reflect that some developments may occur adjacent to less sensitive zones.</p>	<p><i>The RVA seeks for clause b) of the standard to be amended to that it does not apply to boundaries adjoining open space and recreation zones, commercial and mixed use zones, and special purpose zones.</i></p> <p><i>The RVA also seeks to amend the standard as follows:</i></p> <p>14.5.2.6 Height in relation to boundary</p> <p>a. No part of any building shall project beyond <u>a 60° recession plane measured from a building envelope constructed by recession planes shown in Appendix 14.16.2 diagram D</u> from <u>a points 3 4 m</u> above ground level along all boundaries, as shown in Appendix 14.16.12 diagram D. Where <u>Where</u> the boundary forms part of a legal right of way, entrance strip, access site, or pedestrian access way, the height in relation to boundary applies from the farthest boundary of that legal right of way, entrance strip, access site, or pedestrian access way.</p>

Provisions	Submission Position	Reason for Submission	Relief Sought
Medium Density Residential Zone – Built Form Standard 14.5.2.7	Oppose in part	<p>While the RVA does support Standard 14.5.2.7 and the minimum building setbacks which reflect the MDRS, it is considered that Clause iv) is inconsistent with the MDRS and should be deleted.</p> <p>Furthermore, the RVA understands the intent of clause (iii) is to exclude eaves, roof overhangs and guttering from the setback standard where the noted dimensions are met, however the current drafting is unclear and needs to be amended.</p>	<i>The RVA seeks to amend the standard to delete clause iv) entirely and to amend clause (iii) to be clear this is intended as an exclusion to the setback standard where the dimensions are met.</i>
Medium Density Residential Zone – Built Form Standard 14.5.2.8	Oppose in part	<p>The RVA supports Standard 14.5.2.8 and the outlook space provisions in principle which reflect the outlook space standard of the MDRS, however, consider that in a retirement village environment (that has multiple communal spaces available for residents), the standard is not directly relevant. The RVA considers amendments should be made to Standard 14.5.2.8 to provide for outlook space requirements that are appropriate for retirement villages, using the proposed “retirement unit” definition” as discussed earlier in this submission.</p>	<p><i>The RVA seeks to amend Standard 14.5.2.8 as follows to provide for outlook space requirements that are appropriate for retirement villages:</i></p> <p>14.5.2.8 Outlook space per unit</p> <p>...</p> <p>j. <u>For retirement units, clause a applies with the following modification: The minimum dimensions for a required outlook space are 1 metre in depth and 1 metre in width for a principal living room and all other habitable rooms.</u></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
Medium Density Residential Zone – Built Form Standard 14.5.2.10	Oppose in part	The RVA support Standard 14.5.2.10 in principle, to the extent it is consistent with the MDRS, with some additional amendments to provide for retirement units.	<p><i>The RVA seeks to amend Standard 14.5.2.10 as follows to provide for retirement units:</i></p> <p>14.5.2.10 Windows to street</p> <p>a. Any residential unit <u>or retirement unit</u>, facing the <u>a public</u> street must have a minimum of 20% of the street-facing façade in glazing. This can be in the form of windows or doors.</p> <p>...</p>
Medium Density Residential Zone – Built Form Standard 14.5.2.13	Oppose	<p>The RVA oppose 14.5.2.13, which is inconsistent with the Enabling Housing Act. The MDRS does not address service, storage and waste management spaces.</p> <p>Further, this standard does not account for the functional and operational needs of retirement villages and therefore, the RVA seeks for retirement villages to be excluded.</p>	<p><i>Either delete Built Form Standard 14.5.2.13. or amend Standard 14.5.2.13 as follows to provide for retirement units:</i></p> <p>14.5.2.13 Service, storage and waste management spaces</p> <p><i>[Standard as notified]</i></p> <p><u>This standard does not apply to retirement villages or their associated units within.</u></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
Medium Density Residential Zone – Built Form Standard 14.5.2.15	Oppose in part	While the RVA does not take a view on garage and carport building locations for typical residential units, retirement village units are designed differently to residential units and should therefore be excluded from this standard. The provision is also substantially more stringent than for permitted developments, which have no controls on garaging and carport building locations and as such is disproportionate	<i>The RVA seek to amend Standard 14.5.2.15 to exclude retirement units.</i>
High Density Residential Zone – Rule 14.6.1.1 (P10)	Support	The RVA supports Rule 14.6.1.1 (P10) as it permits an activity associated with a retirement village.	Retain Rule 14.6.1.1 (P10) as notified.
High Density Residential Zone – Rule 14.6.1.3 (RD4)	Support in part	<p>The RVA supports Rule 14.6.1.3 (RD4) as it enables the construction of retirement village buildings as a restricted discretionary activity.</p> <p>The RVA also support the Council carrying through the decision made to not impose internal amenity controls on retirement villages, as part of the Christchurch Replacement District Plan to this Plan Change.</p> <p>The RVA acknowledges that Council have already provided retirement villages with their own set of focused matters of discretion (14.15.10). However, the RVA consider that these should be updated to further provide for and acknowledge the</p>	<p><i>The RVA seeks to remove reference to Rule 14.15.10, and include an updated set of matters of discretion to be included in the Plan for the construction of or alteration/addition to a retirement village:</i></p> <p><u>HRZ – MATX Retirement Villages</u></p> <p>1. <u>The extent and effects arising from exceeding any of the relevant density standards (both individually and cumulatively);</u></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		<p>differences that retirement villages have from other residential activities, as well as to better reflect the NPSUD and Enabling Housing Act.</p> <p>Further, the RVA notes that there is one minor error in the drafting of the applicable built form standards which they seek correction of.</p>	<p>2. <u>The effects of the retirement village on the safety of adjacent streets or public open spaces;</u></p> <p>3. <u>The effects arising from the quality of the interface between the retirement village and adjacent streets or public open spaces;</u></p> <p>4. <u>The extent to which articulation, modulation and materiality addresses adverse visual dominance effects associated with building length;</u></p> <p>5. <u>The matters in 14.2.1.6, 14.2.3.1, 14.2.3.2, 14.2.3.3, 14.2.3.4, 14.2.3.5, 14.2.3.6, 14.2.3.7, 14.2.5.1, 14.2.5.2, 14.2.5.3, 14.2.5.4, 14.2.6.1, 14.2.7.1, 14.2.7.6, 14.2.8.3 and the proposed new policies as inserted.</u></p> <p>6. <u>The positive effects of the construction, development and use of the retirement village.</u></p> <p><u>For clarity, no other rules or matters of discretion relating to the effects of density apply to buildings for a retirement village.</u></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<p><i>The RVA seeks to amend the built form standards relating to Rule 14.6.1.3 (RD4) as follows, to amend the drafting error:</i></p> <ul style="list-style-type: none"> a. Any new building, or alteration or addition to an existing building for a retirement village that meet the following built form standards: <ul style="list-style-type: none"> i. ... ii. ... iii. Rule 14.6.2.34 setbacks iv.
High Density Residential Zone – Rule 14.6.1.3 (RD5)	Support in part	The RVA supports Rule 14.6.1.3 (RD5) because it enables the construction of retirement village buildings as a restricted discretionary activity even if the relevant built form standards have not been met. As noted above, the RVA consider that these matters should be updated with a single set of matters of discretion applying to both	<i>The RVA seeks to remove reference to Rule 14.15.10, and include an updated set of matters of discretion to be included in the Plan for the construction of or alteration/addition to a retirement village in the High Density Zone:</i>

Provisions	Submission Position	Reason for Submission	Relief Sought
		<p>construction and alteration/additional to retirement villages.</p> <p>Limited notification of Fire Emergency New Zealand should not be required. Building fire safety is not managed under the Resource Management Act 1991 and Fire Emergency New Zealand has powers including under the Fire and Emergency New Zealand Act 2017 to manage these issues.</p>	<p><u>HRZ – MATX Retirement Villages</u></p> <ol style="list-style-type: none"> 1. <u>The extent and effects arising from exceeding any of the relevant density standards (both individually and cumulatively);</u> 2. <u>The effects of the retirement village on the safety of adjacent streets or public open spaces;</u> 3. <u>The effects arising from the quality of the interface between the retirement village and adjacent streets or public open spaces;</u> 4. <u>The extent to which articulation, modulation and materiality addresses adverse visual dominance effects associated with building length;</u> 5. <u>The matters in 14.2.1.6, 14.2.3.1, 14.2.3.2, 14.2.3.3, 14.2.3.4, 14.2.3.5, 14.2.3.6, 14.2.3.7, 14.2.5.1, 14.2.5.2, 14.2.5.3, 14.2.5.4, 14.2.6.1, 14.2.7.1, 14.2.7.6, 14.2.8.3 and the proposed new policies as inserted.</u>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<p>6. <u>The positive effects of the construction, development and use of the retirement village.</u></p> <p><u>For clarity, no other rules or matters of discretion relating to the effects of density apply to buildings for a retirement village.</u></p> <p><i>The RVA seeks to amend the built form standards relating to Rule 14.6.1.3 (RD5) as follows, to amend the drafting error:</i></p> <ul style="list-style-type: none"> a. Any new building, or alteration or addition to an existing building for a retirement village that does not meet one or more of the following built form standards: <ul style="list-style-type: none"> i. ... ii. ... iii. Rule 14.6.2.34 setbacks iv. ... b. ...

Provisions	Submission Position	Reason for Submission	Relief Sought
			<p>€ Any application arising from Rule 14.6.2.13 shall not be publicly notified and shall be limited notified only to Fire and Emergency New Zealand (absent its written approval).</p>
High Density Residential Zone – Built Form Standard 14.6.2.1	Support	The RVA supports Standard 14.6.2.1 as it aligns with the intent of the NPS-UD and the Enabling Housing Act.	<i>Retain Standard 14.6.2.1 as notified.</i>
High Density Residential Zone – Built Form Standard 14.6.2.2	Oppose in part	<p>The RVA opposes Standard 14.6.2.2 to the extent it is inconsistent with the MDRS. The insertion of the MDRS as drafted is a mandatory requirement of the Act.</p> <p>The RVA also seeks amendments so that height restrictions in relation to boundaries to not apply adjoining open space and recreation zones, commercial and mixed use zones, and special purpose zones. Similar considerations apply to these zones as to road boundaries, in that overlooking and amenity effects at these boundaries are likely to be minor at most. Including boundaries with these zones will provide further development possibilities with minimal adverse effects.</p>	<p><i>The RVA seeks for clause c) of the standard to be amended to that it does not apply to boundaries adjoining open space and recreation zones, commercial and mixed use zones, and special purpose zones.</i></p> <p><i>The RVA also seeks to amend the standard as follows:</i></p> <p>a. No part of any building below a height of 12 m shall project beyond <u>a 60° recession plane measured from a building envelope constructed by recession planes shown in Appendix 14.16.2 diagram D</u> from a points 3 <u>4</u> m above ground level along all boundaries, <u>as shown in Appendix</u></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		Such exclusions should be integrated within the standard to reflect that some developments may occur adjacent to less sensitive zones.	<p><u>14.16.12 diagram D.</u> wWhere the boundary forms part of a legal right of way, entrance strip, access site, or pedestrian access way, the height in relation to boundary applies from the farthest boundary of that legal right of way, entrance strip, access site, or pedestrian access way.</p> <p>b. ...</p>
High Density Residential Zone – Built Form Standard 14.6.2.3	Support	The RVA supports Standard 14.6.2.3 and the minimum building setbacks as they reflect the MDRS.	<i>Retain Standard 14.6.2.3 as notified.</i>
High Density Residential Zone – Built Form Standards 14.6.2.4, 14.6.2.7, 14.6.2.8 & 14.6.2.10	Support	Although these internal amenity standards are not applicable to retirement villages, the RVA would like to reiterate their support for the exclusion of retirement villages from these standards.	<i>Retain Standards 14.6.2.4, 14.6.2.7, 14.6.2.8 and 14.6.2.10 as notified.</i>

Provisions	Submission Position	Reason for Submission	Relief Sought
Chapter 15 – Commercial			
Policy 15.2.2.1 – Role of centres	Oppose in part	The RVA opposes the reference to “above ground floor level” in Row C of Table 15.1 as it is inconsistent with Policy 15.2.2.7 which enables ground floor residential activity in specified circumstances.	<p><i>Amend Row B and C of Table 15.1 to refer to “at least medium” density housing being contemplated in Town Centres.</i></p> <p><i>Amend Row B and C of Table 15.1 to delete the reference to “above ground floor level”.</i></p>
Policy 15.2.2.7 Residential activity in Town and Local centres	Support	The RVA supports the provision for residential activities at ground floor level in specified circumstances. For the avoidance of doubt, the RVA notes that the Plan Change 5B Council Decision is subject to appeal and that the parties have agreed changes to Policy 15.2.2.7 which need to be reflected in this Plan Change.	<i>Retain Policy 15.2.2.7 (and associated Rule 15.14.2.2(f)) as amended by the Plan Change 5B appeal process.</i>
Objective 15.2.3 – Office parks and mixed use areas outside the central city	Support	The RVA supports Objective 15.2.3 as it is aligned with the intent of the NPSUD and Enabling Housing Act to provide for intensification and a diversity of housing types close to City Centre zones.	<i>Retain Objective 15.2.3 as notified.</i>

Provisions	Submission Position	Reason for Submission	Relief Sought
Policy 15.2.3.2 – Mixed use areas outside the central city	Support in part	<p>The RVA supports Policy 15.2.3.2 insofar as it meets the intent of the NPSUD and Enabling Housing Act by supporting intensification within centres and supports a compact and sustainable urban form that provides for the integration of commercial activity with residential activity.</p> <p>However, the RVA considers that Policy 15.2.3.2's provisions requiring developments to achieve a high standard of on-site residential amenity should be redrafted to better reflect the Enabling Housing Act.</p>	<p><i>The RVA seeks to amend Policy 15.2.3.2 as follows to remove provisions that have the potential to refine / limit the intensification provisions of the Enabling Housing Act:</i></p> <p>Policy 15.2.3.2</p> <ul style="list-style-type: none"> a. ... b. Support mixed use zones located within a 15 minute walking distance of the City Centre Zone, to transition into high quality residential neighbourhoods by: <ul style="list-style-type: none"> i. ... ii. ... iii. <u>Encouraging</u> developments to achieve a high standard of on-site residential amenity to offset and improve the current low amenity industrial environment and mitigate potential conflicts between uses;

Provisions	Submission Position	Reason for Submission	Relief Sought
			iv.
Objective 15.2.4 – Urban form, scale and design outcomes	Support in part	The RVA supports the intent of Objective 15.2.4 to recognise that the existing character and context will evolve over time, but considers that the term “anticipated” does not accurately recognise that urban environments will change over time, including in ways which are not anticipated by the Plan.	<p><i>Amend Objective 15.2.4 to recognise that environments change and develop over time:</i></p> <p>15.2.4 Objective – Urban form, scale and design outcomes</p> <p>a. A scale, form and design of development that is consistent with the role of a centre and its contribution to city form, and the intended built form outcomes for mixed use zones, and which:</p> <p>i. ...</p> <p>ii. contributes to an urban environment that is visually attractive, safe, easy to orientate, conveniently accessible, and responds positively to anticipated local character and context, <u>recognising that urban environments develop and change over time</u>;</p> <p>iii. recognises the functional and operational requirements of activities</p>

Provisions	Submission Position	Reason for Submission	Relief Sought
			and the anticipated <u>and changing</u> built form; ...
Policy 15.2.4.2 – Design of new development	Oppose in part	<p>While the RVA acknowledges the importance of well-designed developments, it considers that Policy 15.2.4.2's provisions are overly restrictive and should be redrafted to better provide for a range of housing typologies.</p> <p>In particular, the RVA is concerned with the new proposed requirement for new development to embody a "human scale and fine grain". These requirements have a degree of subjectivity and do not acknowledge the unique functional and operational requirements of retirement villages and restricts the ability to provide a diversity of housing typologies.</p> <p>In addition, the RVA considers other building design requirements, such as the requirement for the design of development to mitigate potential adverse effects such as "heat islands", "heat reflection or refraction" and "wind-related effects", over-regulate development by going beyond the policy</p>	<i>The RVA seeks to amend Policy 15.2.4.2 to reflect the NPSUD and to remove provisions that unduly restrict the development of a diversity of housing typologies, including retirement villages.</i>

Provisions	Submission Position	Reason for Submission	Relief Sought
		directives of the NPS-UD and the Enabling Housing Act.	
Policy 15.2.6.3 - Amenity	Oppose in part	<p>While Policy 15.2.6.3 does account for amenity values that evolve, the RVA seek for the wording in this Policy to be amended so that it reflects that of the NPSUD.</p> <p>Further, while the RVA supports the policy's provision for a high standard of amenity to be achieved in the Central City, they consider that the requirement for amenity to be in accordance with design standards should not be applicable to retirement villages, noting that these design standards tend to be developed for standard residential developments and are not fit-for-purpose for retirement villages.</p>	<p><i>The RVA seeks to amend Policy 15.2.6.3 as follows to reflect the NPSUD and to remove provisions that have the potential to refine / limit the intensification provisions of the Enabling Housing Act:</i></p> <p>Policy 15.2.6.3</p> <p>a. Promote a high standard of amenity and discourage activities from establishing where they will have an adverse effect on the <u>developing and changing</u> evolving amenity values of the Central City by:</p> <p>...</p>
Policy 15.2.6.4 – Residential intensification	Support in part	The RVA supports the policy's intent to encourage residential intensification within the City Centre Zone, including a range of residential typologies, tenures and prices.	<i>Retain Policy 15.2.6.4 as notified.</i>

Provisions	Submission Position	Reason for Submission	Relief Sought
Policy 15.2.6.5 – Pedestrian focus	Oppose in part	The RVA considers building design requirements, such as the requirement development to control “wind generation” over-regulate development and going beyond the policy directives of the NPS-UD and the Enabling Housing Act.	<i>Delete the reference to “wind generation” in Policy 15.2.6.5.</i>
Policy 15.2.7.1 – Diversity of activities	Support in part	While the RVA recognise and support that opportunities are being made for taller buildings to accommodate residential activity within the Central City Mixed Use Zone which reflects the intent of the NPSUD and Enabling Housing Act, they should not be restricted to only being co-located with large-scale community facilities, Te Kaha and Parakiore.	<p><i>The RVA seeks to amend Policy 15.2.7.1 as follows to remove provisions that have the potential to refine / limit the intensification provisions of the Enabling Housing Act:</i></p> <p>Policy 15.2.7.1</p> <p>a. Enhance and revitalise the Central City Mixed Use Zone by enabling:</p> <p>...</p> <p>i. Opportunities for taller buildings to accommodate residential activity and visitor accommodation, to support the vibrancy of the City Centre Zone, where co-located with the large-scale</p>

Provisions	Submission Position	Reason for Submission	Relief Sought
			community facilities, Te Kaha and Parakire.
Objective 15.2.8 – Built form and amenity in the Central City Mixed Use Zone	Support in part	While Objective 15.2.8 does account for amenity values that evolve, the RVA seek for the wording in this Objective to be amended so that it reflects that of the NPSUD.	<p><i>The RVA seeks to amend Objective 15.2.8 as follows to reflect the provisions of the NPSUD:</i></p> <p>Objective 15.2.8</p> <p>a. Ensure a form of built development that contributes positively to the <u>developing and changing</u> evolving amenity values of the area, including people's health and safety, and to the quality and enjoyment of the environment for those living, working within or visiting the area.</p>
Policy 15.2.8.2 – Amenity and effects	Support in part	While Policy 15.2.8.2 does account for amenity values that evolve, the RVA seek for the wording in this Policy to be amended so that it reflects that of the NPSUD. The RVA also notes there is significant overlap between Policy 15.2.8.2 and Policy 15.2.6.3, which creates uncertainty for plan users.	<p><i>The RVA seeks changes to address possible overlap between Policy 15.2.8.2 and Policy 15.2.6.3 and amendments to Policy 15.2.8.2 as follows to reflect the provisions of the NPSUD:</i></p> <p>Policy 15.2.8.2</p> <p>a. Promote a high standard of built form and amenity and discourage</p>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<p>activities from establishing where they will have an adverse effect on the <u>developing and changing evolving</u> amenity values of Central City, by:</p> <p>...</p>
Policy 15.2.8.3 – Residential development	Support in part	The RVA generally supports the provision for private amenity space in a manner which is “proportionate” to the proposed residential activity. However, it considers that the need to “require” a level of private amenity space which “compensates” for the predominately commercial nature of the area is unclear and may lead to interpretation issues and barriers to necessary development.	<p><i>The RVA seeks to amend Policy 15.2.8.3(b) as follows:</i></p> <p>(b) Require<u>Encourage</u> a level of private amenity space for residents that is proportionate to the extent of residential activity proposed, and which compensates for the predominantly commercial nature of the area, through:</p> <p>i. ...</p>
Commercial Zones – Objectives and Policies	New objective and policies sought	The RVA considers policy support for retirement villages in the relevant commercial zones is required as set out in the submission above. The proposed policy to be inserted reflects agreements made within PC5.	<p><i>The RVA seeks that a new objective is inserted in the Commercial Zones objectives that provides for the housing and care needs of the ageing population.</i></p> <p><u>Objective 15.2.12 Ageing population</u></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		<p>It is anticipated that this objective and policy will be applied to all relevant commercial zones.</p>	<p><u>Provide a diverse range of housing and care options that are suitable for the particular needs and characteristics of older persons such as retirement villages.</u></p> <p><u>New Policy – Housing in Commercial Zones</u></p> <p><i>Provide for retirement villages in commercial zones (other than the Commercial Office Zone, the Commercial Retail Park Zone and within the Lyttelton Port Influences Overlay Area in the Commercial Banks Peninsula Zone), and recognise that retirement villages can provide for higher densities than other forms of residential developments, because they provide for shared spaces, services and facilities, and enable affordability and the efficient provision of assisted living and care services.</i></p> <p><i>Advice Note: All other objectives and policies relevant to residential activity in commercial zones also apply to retirement villages.</i></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
Commercial Zones – Objectives and Policies	New policy sought	<p>The RVA considers that it would be appropriate to enable the density standards to be utilised as a baseline for the assessment of the effects of developments as noted in the submission above.</p> <p>It is anticipated that this policy will be applied to all relevant commercial zones.</p>	<p><i>Insert the following new policy:</i></p> <p><u>New Policy Role of density standards</u></p> <p><u>Enable the density standards to be utilised as a baseline for the assessment of the effects of developments other than in areas where the Plan provides location-specific density standards.</u></p>
Commercial Zones – Objectives and Policies	New policy sought	<p>The RVA considers that a new policy is required to give effect to the direction under the NPSUD that acknowledges amenity values evolve over time, and that expectations for existing amenity must also evolve in order to enable necessary housing.</p> <p>It is anticipated that this policy will be applied to all relevant commercial zones.</p>	<p><i>Insert the following new policy:</i></p> <p><u>New Policy Changing communities</u></p> <p><u>To provide for the diverse and changing residential needs of communities, recognise that the existing character and amenity of the Commercial zones will change over time to enable a variety of housing types with a mix of densities.</u></p>
Commercial Zones – Objectives and Policies	New policy sought	<p>As discussed in the RVA’s submission above, the RVA considers that the District Plan must recognise the intensification opportunities provided by larger sites. These types of sites</p>	<p><i>Insert the following new policy:</i></p> <p><u>New Policy Larger sites</u></p> <p><u>Recognise the intensification opportunities provided by larger sites</u></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		are extremely rare and it is important they are developed efficiently.	<u>within the Commercial Zones by providing for more efficient use of those sites.</u>
Chapter 15.4 – Town Centre Zone Rules			
Rule 15.4.1.1 (P1 & P21) – Town Centre Zone	Support in part	<p>Recognising that the Enabling Housing Act is not limited to residential zones, with Councils required to ensure district plans provide for intensification in urban non-residential zones, the RVA considers that the Town Centre Zone should provide for retirement village activities as a permitted activity (with the construction of the retirement village being a restricted discretionary activity). This would recognise that retirement villages provide substantial benefit by enabling older people to remain in familiar community environments for longer (close to family and support networks), whilst also freeing up a number of dwellings located in surrounding suburbs.</p> <p>The RVA supports Rule 15.4.1.1 (P1) and the permitting of the establishment of any new building, or addition to a building when complying with the relevant standards; and the triggering of more restrictive activity statuses based on non-compliance with</p>	<p><i>The RVA seeks that a new rule is inserted in the Town Centre Zone that provides for retirement villages as permitted activities.</i></p> <p><u>TCZ-RX – Retirement village</u></p> <p><u>Activity status: PER</u></p> <p><u>Activity status when compliance not achieved: N/A</u></p> <p><i>The RVA seeks that a new rule is inserted in the Town Centre Zone that provides for the construction of retirement villages as a restricted discretionary activity and to include a set of focused matters of discretion that are applicable to retirement villages, to provide for and acknowledge the</i></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		<p>relevant activity specific standards and built form standards.</p> <p>Noting that retirement villages will infringe the standard requiring residential activities to be located above ground level and likely infringe the gross leasable floor area standard, retirement villages will typically be a controlled or restricted discretionary activity.</p> <p>As such, the RVA considers that a rule should be provided that provides specifically for retirement villages as a restricted discretionary activity, and that the construction of retirement villages should have their own set of focused matters of discretion (so as to provide for and acknowledge the differences that retirement villages have from other residential activities).</p> <p>The RVA considers the matters of discretion applicable to retirement villages need to appropriately provide for / support the efficient use of larger sites for retirement villages, and the functional and operational needs of the retirement village.</p>	<p><i>differences that retirement villages have from other residential activities.</i></p> <p><u>TCZ-RX Retirement Villages</u></p> <p><u>Construction or alteration of or addition to any building or other structure for a retirement village.</u></p> <p>Activity Status: <u>Restricted Discretionary</u></p> <p><u>Matters for discretion</u></p> <p><u>The exercise of discretion in relation to TCZ-RX is restricted to the following matters:</u></p> <ol style="list-style-type: none"> <u>1. The extent and effects arising from exceeding any of the relevant built form standards (both individually and cumulatively).</u> <u>2. The effects of the retirement village on the safety of adjacent streets or public open spaces.</u> <u>3. The effects arising from the quality of the interface between</u>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<p><u>the retirement village and adjacent streets or public open spaces.</u></p> <p>4. <u>The extent to which articulation, modulation and materiality addresses visual dominance effects associated with building length.</u></p> <p>5. <u>The relevant objectives and policies in 15.2 (specifically 15.2.2.7) and the proposed new policies as inserted.</u></p> <p>6. <u>The positive effects of the construction, development and use of the retirement village.</u></p> <p><u>For clarity, no other rules or matters of discretion relating to the effects of density apply to buildings for a retirement village.</u></p> <p><u>Notification:</u></p> <p><u>An application for resource consent associated with a retirement village</u></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<p><u>made in respect of TCZ-RX is precluded from being publicly notified.</u></p> <p><u>An application for resource consent associated with a retirement village made in respect of Rule TCZ-RX that complies with the relevant external amenity standards is precluded from being limited notified.</u></p>
Chapter 15.5 – Local Centre Zone Rules			
Rule 15.5.1.1 (P1 & P21) – Local Centre Zone	Support in part	<p>Recognising that the Enabling Housing Act is not limited to residential zones, with Councils required to ensure district plans provide for intensification in urban non-residential zones, the RVA considers that the Local Centre Zone should provide for retirement village activities as a permitted activity (with the construction of the retirement village being a restricted discretionary activity). This would recognise that retirement villages provide substantial benefit by enabling older people to remain in familiar community environments for longer (close to family and support networks), whilst also freeing up a number of dwellings located in surrounding suburbs.</p> <p>The RVA supports Rule 15.5.1.1 (P1) and the permitting of the establishment of any new</p>	<p><i>The RVA seeks that a new rule is inserted in the Local Centre Zone that provides for retirement villages as permitted activities.</i></p> <p><u>LCZ-RX – Retirement village</u></p> <p><u>Activity status: PER</u></p> <p><u>Activity status when compliance not achieved: N/A</u></p> <p><i>The RVA seeks that a new rule is inserted in the Local Centre Zone that provides for the construction of retirement villages as a restricted discretionary activity and to include a set of focused matters of discretion that are</i></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		<p>building, or addition to a building when complying with the relevant standards; and the triggering of more restrictive activity statuses based on non-compliance with relevant activity specific standards and built form standards.</p> <p>Noting that retirement villages will infringe the standard requiring residential activities to be located above ground level and likely infringe the gross leasable floor area standard, retirement villages will typically be a controlled or restricted discretionary activity.</p> <p>As such, the RVA considers that a rule should be provided that provides specifically for retirement villages as a restricted discretionary activity, and that the construction of retirement villages should have their own set of focused matters of discretion (so as to provide for and acknowledge the differences that retirement villages have from other residential activities).</p> <p>The RVA considers the matters of discretion applicable to retirement villages need to appropriately provide for / support the efficient use of larger sites for retirement</p>	<p><i>applicable to retirement villages, to provide for and acknowledge the differences that retirement villages have from other residential activities.</i></p> <p><u>LCZ-RX Retirement Villages</u></p> <p><u>Construction or alteration of or addition to any building or other structure for a retirement village.</u></p> <p><u>Activity Status: Restricted Discretionary</u></p> <p><u>Matters for discretion</u></p> <p><u>The exercise of discretion in relation to LCZ-RX is restricted to the following matters:</u></p> <ol style="list-style-type: none"> <u>1. The extent and effects arising from exceeding any of the relevant built form standards (both individually and cumulatively).</u> <u>2. The effects of the retirement village on the safety of adjacent streets or public open spaces.</u>

Provisions	Submission Position	Reason for Submission	Relief Sought
		villages, and the functional and operational needs of the retirement village.	<p>3. <u>The effects arising from the quality of the interface between the retirement village and adjacent streets or public open spaces.</u></p> <p>4. <u>The extent to which articulation, modulation and materiality addresses visual dominance effects associated with building length.</u></p> <p>5. <u>The relevant objectives and policies in 15.2 (specifically 15.2.2.7) and the proposed new policies as inserted.</u></p> <p>6. <u>The positive effects of the construction, development and use of the retirement village.</u></p> <p><u>For clarity, no other rules or matters of discretion relating to the effects of density apply to buildings for a retirement village.</u></p> <p><u>Notification:</u></p> <p><u>An application for resource consent associated with a retirement village</u></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<p><u>made in respect of Rule LCZ-RX is precluded from being publicly notified.</u></p> <p><u>An application for resource consent associated with a retirement village made in respect of Rule LCZ-RX that complies with the relevant external amenity standards is precluded from being limited notified.</u></p>
Chapter 15.6 – Neighbourhood Centre Zone Rules			
Rule 15.6.1.1 (P1 & P19) – Neighbourhood Centre Zone	Support in part	<p>Recognising that the Enabling Housing Act is not limited to residential zones, with Councils required to ensure district plans provide for intensification in urban non-residential zones, the RVA considers that the Neighbourhood Centre Zone should provide for retirement village activities as a permitted activity (with the construction of the retirement village being a restricted discretionary activity). This would recognise that retirement villages provide substantial benefit by enabling older people to remain in familiar community environments for longer (close to family and support networks), whilst also freeing up a number of dwellings located in surrounding suburbs.</p>	<p><i>The RVA seeks that a new rule is inserted in the Neighbourhood Centre Zone that provides for retirement villages as permitted activities.</i></p> <p><u>NCZ-RX – Retirement village</u></p> <p><u>Activity status: PER</u></p> <p><u>Activity status when compliance not achieved: N/A</u></p> <p><i>The RVA seeks that a new rule is inserted in the Neighbourhood Centre Zone that provides for the construction of retirement villages as a restricted discretionary activity and to include a set of focused matters of discretion that are</i></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		<p>The RVA supports Rule 15.6.1.1 (P1) and the permitting of the establishment of any new building, or addition to a building when complying with the relevant standards; and the triggering of more restrictive activity statuses based on non-compliance with relevant activity specific standards and built form standards.</p> <p>Noting that retirement villages will infringe the standard requiring residential activities to be located above ground level and likely infringe the setback from road frontage standard for residential activities in the central city, retirement villages will typically be a restricted discretionary activity.</p> <p>As such, the RVA considers that a rule should be provided that provides specifically for retirement villages as a restricted discretionary activity, and that the construction of retirement villages should have their own set of focused matters of discretion (so as to provide for and acknowledge the differences that retirement villages have from other residential activities).</p> <p>The RVA considers the matters of discretion applicable to retirement villages need to appropriately provide for / support the</p>	<p><i>applicable to retirement villages, to provide for and acknowledge the differences that retirement villages have from other residential activities.</i></p> <p><u>NCZ-RX Retirement Villages</u></p> <p><u>Construction or alteration of or addition to any building or other structure for a retirement village.</u></p> <p><u>Activity Status:</u> <u>Restricted Discretionary</u></p> <p><u>Matters for discretion</u></p> <p><u>The exercise of discretion in relation to LCZ-RX is restricted to the following matters:</u></p> <ol style="list-style-type: none"> <u>1. The extent and effects arising from exceeding any of the relevant built form standards (both individually and cumulatively).</u> <u>2. The effects of the retirement village on the safety of adjacent streets or public open spaces.</u>

Provisions	Submission Position	Reason for Submission	Relief Sought
		efficient use of larger sites for retirement villages, and the functional and operational needs of the retirement village.	<p>3. <u>The effects arising from the quality of the interface between the retirement village and adjacent streets or public open spaces.</u></p> <p>4. <u>The extent to which articulation, modulation and materiality addresses visual dominance effects associated with building length.</u></p> <p>5. <u>The relevant objectives and policies in 15.2 (specifically 15.2.11.3) and the proposed new policies as inserted.</u></p> <p>6. <u>The positive effects of the construction, development and use of the retirement village.</u></p> <p><u>For clarity, no other rules or matters of discretion relating to the effects of density apply to buildings for a retirement village.</u></p> <p><u>Notification:</u></p> <p><u>An application for resource consent associated with a retirement village</u></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<p><u>made in respect of NCZ-RX is precluded from being publicly notified.</u></p> <p><u>An application for resource consent associated with a retirement village made in respect of NCZ-RX that complies with the relevant external amenity standards is precluded from being limited notified.</u></p>
Chapter 15.10 – Mixed Use Zone Rules			
Rule 15.10.1.1 (P27) – Mixed Use Zone	Support in part	<p>Recognising that the Enabling Housing Act is not limited to residential zones, with Councils required to ensure district plans provide for intensification in urban non-residential zones, the RVA considers that the Mixed Use Zone should provide for retirement village activities as a permitted activity (with the construction of the retirement village being a restricted discretionary activity). This would recognise that retirement villages provide substantial benefit by enabling older people to remain in familiar community environments for longer (close to family and support networks), whilst also freeing up a number of dwellings located in surrounding suburbs.</p> <p>The RVA supports Rule 15.10.1.1 (P1) and the permitting of the establishment of any new</p>	<p><i>The RVA seeks that a new rule is inserted in the Mixed Use Zone that provides for retirement villages as permitted activities.</i></p> <p><u>MUZ-RX – Retirement village</u></p> <p><u>Activity status: PER</u></p> <p><u>Activity status when compliance not achieved: N/A</u></p> <p><i>The RVA seeks that a new rule is inserted in the Mixed Use Zone that provides for the construction of retirement villages as a restricted discretionary activity and to include a set of focused matters of discretion that are</i></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		<p>building, or addition to a building when complying with the relevant standards; and the triggering of more restrictive activity statuses based on non-compliance with relevant activity specific standards and built form standards.</p> <p>Noting that retirement villages will likely infringe the standard requiring residential activities to be located above ground level, retirement villages will typically be a restricted discretionary activity.</p> <p>As such, the RVA considers that a rule should be provided that provides specifically for retirement villages as a restricted discretionary activity, and that the construction of retirement villages should have their own set of focused matters of discretion (so as to provide for and acknowledge the differences that retirement villages have from other residential activities).</p> <p>The RVA considers the matters of discretion applicable to retirement villages need to appropriately provide for / support the efficient use of larger sites for retirement villages, and the functional and operational needs of the retirement village.</p>	<p><i>applicable to retirement villages, to provide for and acknowledge the differences that retirement villages have from other residential activities.</i></p> <p><u>MUZ-RX Retirement Villages</u></p> <p><u>Construction or alteration of or addition to any building or other structure for a retirement village.</u></p> <p><u>Activity Status:</u> <u>Restricted Discretionary</u></p> <p><u>Matters for discretion</u></p> <p><u>The exercise of discretion in relation to MUZ-RX is restricted to the following matters:</u></p> <ol style="list-style-type: none"> <u>1. The extent and effects arising from exceeding any of the relevant built form standards (both individually and cumulatively).</u> <u>2. The effects of the retirement village on the safety of adjacent streets or public open spaces.</u>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<p>3. <u>The effects arising from the quality of the interface between the retirement village and adjacent streets or public open spaces.</u></p> <p>4. <u>The extent to which articulation, modulation and materiality addresses visual dominance effects associated with building length.</u></p> <p>5. <u>The relevant objectives and policies in 15.2 (specifically 15.2.3.2) and the proposed new policies as inserted.</u></p> <p>6. <u>The positive effects of the construction, development and use of the retirement village.</u></p> <p><u>For clarity, no other rules or matters of discretion relating to the effects of density apply to buildings for a retirement village.</u></p> <p><u>Notification:</u></p> <p><u>An application for resource consent associated with a retirement village</u></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<p><u>made in respect of MUZ-RX is precluded from being publicly notified.</u></p> <p><u>An application for resource consent associated with a retirement village made in respect of MUZ-RX that complies with the relevant external amenity standards is precluded from being limited notified.</u></p>
Chapter 15.11 – City Centre Zone Rules			
Rule 15.11.1.1 (P16) – City Centre Zone	Support	The RVA supports Rule 15.11.1.1 (P16) as it permits retirement village activities.	<i>Retain Rule 15.11.1.1 (P16) as notified.</i>
Rule 15.11.1.3 (RD6 & RD7)	Support in part	<p>The RVA acknowledges that Council have provided a retirement specific framework which enables retirement villages as a restricted discretionary activity if they are located in the Core or if they do not meet one or more of the built form standards.</p> <p>However, the RVA seek the construction of retirement village buildings is a restricted discretionary activity whether or not the built form standards are complied with.</p>	<i>The RVA seek the deletion of Rule 15.11.1.3 (RD6), and the amendment of Rule 15.11.1.3 (RD7) to provide for the construction of retirement villages as a restricted discretionary activity and to include a set of focused matters of discretion that are applicable to retirement villages, to provide for and acknowledge the differences that retirement villages have from other residential activities.</i>

Provisions	Submission Position	Reason for Submission	Relief Sought
		<p>The RVA acknowledges that Council have already provided retirement villages with their own set of focused matters of discretion (15.14.2.14). However, the RVA consider that these should be updated to further provide for and acknowledge the differences that retirement villages have from other residential activities, as well as better reflect the NPS-UD and Enabling Housing Act.</p>	<p>15.11.1.3 (RD7)</p> <p><u>Construction or alteration of or addition to any building or other structure for a Retirement village.</u> That does not meet any one or more of the built form standards in Rule 15.11.2 unless otherwise specified.</p> <p><u>Matters for discretion</u></p> <p><u>The exercise of discretion in relation to Rule 15.11.1.3 (RD7) is restricted to the following matters:</u></p> <ol style="list-style-type: none"> <u>1. The extent and effects arising from exceeding any of the relevant built form standards (both individually and cumulatively).</u> <u>2. The effects of the retirement village on the safety of adjacent streets or public open spaces.</u> <u>3. The effects arising from the quality of the interface between the retirement village and</u>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<p><u>adjacent streets or public open spaces.</u></p> <p>4. <u>The extent to which articulation, modulation and materiality addresses visual dominance effects associated with building length.</u></p> <p>5. <u>The relevant objectives and policies in 15.2 (specifically 15.2.6.4) and the proposed new policies as inserted.</u></p> <p>6. <u>The positive effects of the construction, development and use of the retirement village.</u></p> <p><u>For clarity, no other rules or matters of discretion relating to the effects of density apply to buildings for a retirement village.</u></p> <p><u>Notification:</u></p> <p><u>An application for resource consent associated with a retirement village made in respect of Rule 15.11.1.3 (RD7) is precluded from being publicly notified.</u></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<u>An application for resource consent associated with a retirement village made in respect of Rule 15.11.1.3 (RD7) that complies with the relevant external amenity standards is precluded from being limited notified.</u>
Chapter 15.12 – Central City Mixed Use Zone Rules			
Rule 15.12.1.1 (P21) – Central City Mixed Use Zone	Support	The RVA supports Rule 15.12.1.1 (P21) as it permits retirement village activities.	<i>Retain Rule 15.12.1.1 (P21) as notified.</i>
Rule 15.12.1.3 (RD3) – Central City Mixed Use Zone	Support in part	<p>The RVA acknowledges that Council have provided a retirement specific framework which enables retirement villages as a restricted discretionary activity if they do not meet one or more of the built form standards.</p> <p>However, the RVA seek for the construction of retirement village buildings is a restricted discretionary activity whether or not the built form standards are complied with.</p> <p>The RVA acknowledges that Council have already provided retirement villages with their own set of focused matters of discretion (15.14.2.14). However, the RVA consider that these should be updated to further provide for and acknowledge the differences</p>	<p><i>The RVA seek the amendment of Rule 15.12.1.3 (RD3) to provide for the construction of retirement villages as a restricted discretionary activity and to include a set of focused matters of discretion that are applicable to retirement villages, to provide for and acknowledge the differences that retirement villages have from other residential activities.</i></p> <p>15.12.1.3 (RD3)</p> <p><u>Construction or alteration of or addition to any building or other structure for Retirement villages, that do not meet</u></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		that retirement villages have from other residential activities, as well as better reflect the NPS-UD and Enabling Housing Act.	<p>any one or more of the built form standards, unless otherwise specified.</p> <p><u>Matters for discretion</u></p> <p><u>The exercise of discretion in relation to Rule 15.12.1.3 (RD3) is restricted to the following matters:</u></p> <ol style="list-style-type: none"> 1. <u>The extent and effects arising from exceeding any of the relevant built form standards (both individually and cumulatively).</u> 2. <u>The effects of the retirement village on the safety of adjacent streets or public open spaces.</u> 3. <u>The effects arising from the quality of the interface between the retirement village and adjacent streets or public open spaces.</u> 4. <u>The extent to which articulation, modulation and materiality addresses visual dominance</u>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<p><u>effects associated with building length.</u></p> <p>5. <u>The relevant objectives and policies in 15.2 (specifically 15.2.8.3) and the proposed new policies as inserted.</u></p> <p>6. <u>The positive effects of the construction, development and use of the retirement village.</u></p> <p><u>For clarity, no other rules or matters of discretion relating to the effects of density apply to buildings for a retirement village.</u></p> <p><u>Notification:</u></p> <p><u>An application for resource consent associated with a retirement village made in respect of Rule 15.12.1.3 (RD3) is precluded from being publicly notified.</u></p> <p><u>An application for resource consent associated with a retirement village made in respect of Rule 15.12.1.3 (RD3) that complies with the relevant external</u></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<u>amenity standards is precluded from being limited notified.</u>

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

James

Last name:

Barbour

Preferred method of contact

Email

Attached Documents

Name
Plan Change 14 Submission- 28 Blair Ave- FINAL

Form 5
Submission on notified proposal for a Plan Change
 Clause 6 of Schedule 1, Resource Management Act 1991

To: **Christchurch District Council**

Name of Submitters: **James Barbour and Judith Barbour**

Background

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

- (d) rezoning of industrial areas near the central city for housing and mixed-use activities;
- (e) introducing qualifying matters to reduce the scale and density of buildings enabled by the MDRS and NPS-UD is reduced; and
- (f) amending objectives, policies, and other provisions throughout the District Plan.

Introduction

5. This is a submission on PC14 made by James Barbour and Judith Barbour (**the submitters**). The submitters have interests in the property legally described as Lot 4 Deposited Plan 10036 as held within the Record of Title CB22F/826, located at 28 Blair Avenue, Papanui, Christchurch (**the site**).
6. The property is depicted in **Figure 1** below.

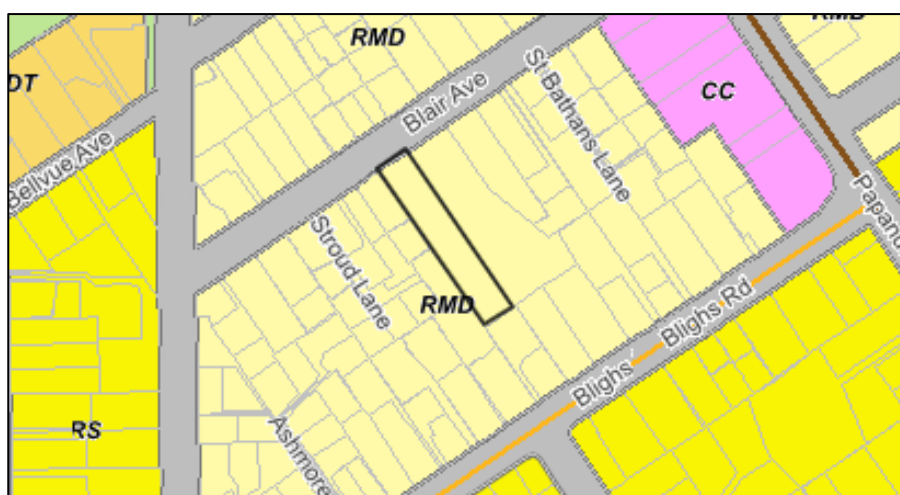


Figure 1 Location of the property within black boundaries, with operative District Plan zoning illustrated (CCC District Plan).

7. The property is located on Blair Avenue which is a local road. The property has legal access from this legal road.
8. The property is located within the Residential Medium Density Zone under the operative District Plan. The site is proposed to be zoned High Density Residential Zone and within the Town Centre Intensification Precinct under PC14.

Specific provisions of the plan change that this submission relates to

9. The submitter has an interest in the plan change as a whole and therefore this submission relates to all provisions and zonings of the plan change. The submitter has a specific interest in all provisions and zoning that relate to the properties referred to above.

Submission

10. The submitter **supports** the plan change as notified. More specifically:

- (a) The Submitter supports the intensification of housing and urban form in the district, particularly near the city and commercial centres, and supports any provisions or changes to the District Plan that will achieve this outcome. Conversely, the Submitter opposes any provisions or changes that will adversely affect this outcome.
- (b) The Submitter also considers that the density standards as set out in the Amendment Act best achieve the NPS-UD, and PC14 should be amended to reflect those. Policy 3 of the NPS-UD is of direct relevance, whereby at sub clause (d) it directs that the district plan is to enable building heights and density of urban form commensurate with the level of residential activity and housing demand.

Relief Sought

- 11. Primarily, the Submitter seeks that the NPS-UD is properly and fully given effect to through the provisions and zoning of PC14 through the intensification of development through enabling plan provisions and an increase in development capacity for residential and business use across the district.
- 12. Furthermore, the Submitter seeks that the Council reject, refuse, or otherwise decline the Qualifying Matters that do not align with that directed by the Central Government through the Amendment Act.
- 13. The submitter seeks any other additional or consequential relief to the District Plan, including but not limited to, the maps, issues, objectives, policies, rules, controls/discretions, assessment criteria and explanations that will give effect to the matters raised in this submission and the relevant planning legislation.

Other

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

DATED 12 May 2023



pp. _____

James Barbour and Judith Barbour

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Submitter Details

First name: Jo

Last name: Appleyard

Organisation: Carter Group Limited

On behalf of: Carter Group Limited

Preferred method of contact

Attached Documents

Name
PC14 Submission - Carter Group Limited 3463-6014-0323

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: Carter Group Limited (*Carter Group*)

- 1 This is a submission on the proposed plan change 14 (*PC14*) to the Christchurch District Plan (the *District Plan*).
- 2 Carter Group could not gain an advantage in trade competition through this submission.
- 3 Carter Group's submission relates to the whole of PC14. The specific relief sought by Carter Group is set out at **Appendix 1** and the key points elaborated on below.
- 4 Carter Group wishes to be heard in support of the submission.
- 5 If others make a similar submission, Carter Group will consider presenting a joint case with them at a hearing.

PROPOSED CHANGES TO THE RESIDENTIAL ZONE CHAPTERS

- 6 By way of general feedback, Carter Group considers that PC14 fails to enable intensification, residential activity and building heights in the manner envisaged by the NPS-UD and Resource Management Act 1991.
- 7 More specifically, to the extent that greater provision for building heights and/or residential activity has been provided for throughout the City by way of the proposed changes, this is countered by the corresponding amendments to policy provisions, rules, activity status, and assessment matters which have the effect of introducing greater time, cost and uncertainty to projects.
- 8 In Carter Group's views, such changes undermine the intensification sought by the RMA and NPS-UD and they are not otherwise necessary or appropriate to promote intensification in a manner consistent with the stated purpose of PC14. Moreover, such changes are inconsistent with strategic directions in Chapter 3, and objective 3.3.2 in particular which requires (with our emphasis):

3.3.2 Objective - Clarity of language and efficiency

a. The District Plan, through its preparation, change, interpretation and implementation:

i. Minimises:

A. transaction costs and reliance on resource consent processes; and

B. the number, extent, and prescriptiveness of development controls and design standards in the rules, in order to encourage innovation and choice; and

C. the requirements for notification and written approval; and

ii. Sets objectives and policies that clearly state the outcomes intended; and

iii. Uses clear, concise language so that the District Plan is easy to understand and use.

- 9 In simple terms, the additional regulatory controls proposed are not enabling.
- 10 In Carter Group's views, greater use should be made of permitted or controlled activity status; and caution should be exercised in the drafting of policies and assessment criteria to ensure such provisions are clear, certain and are ultimately enabling and supportive of intensification.

PROPOSED CHANGES TO THE COMMERCIAL ZONE CHAPTER

- 11 In general terms, the proposed changes to commercial zones fail to 'enable' intensification in the manner envisaged by the NPS-UD, and policy 3 especially. Again, such changes are also inconsistent with strategic objective 3.3.2.
- 12 To the extent that intensification is provided for by PC14 (e.g. increased building heights), this is countered by the corresponding amendments to policy provisions, rules, activity status, and assessment matters which have the effect of 'disenabling' or further constraining development and adding time, cost and uncertainty to projects.
- 13 Such changes undermine the intensification sought by the NPS-UD and they are not otherwise necessary or appropriate to promote intensification in a manner consistent with the stated purpose of PC14.
- 14 In simple terms, the additional regulatory controls proposed are not enabling.
- 15 In Carter Group's views, greater use should be made of permitted or controlled activity status; and caution should be exercised in the drafting of policies and assessment criteria to ensure such provisions are clear, certain and are ultimately enabling and supportive of intensification.

Avonhead mall

- 16 Given the extent of intensification provided for in the residential catchment surrounding Avonhead Mall and the absence of other commercial centres and

activity in this catchment, a corresponding level of intensification at Avonhead mall is appropriate.

- 17 Such intensification could occur without escalating the status of Avonhead in the commercial centres hierarchy (to a TCZ) by reclassifying the centre as a Local Centre (large) rather than Local Centre (small). Carter Group seek that Avonhead mall is recognised as a Local Centre (large).

QUALIFYING MATTERS

- 18 Firstly, Carter Group considers that the introduction of a number of the qualifying matters in PC14 as notified is legally wrong, and falls outside of the scope of what is allowed under the RMA to be included in an intensification planning instrument like PC14:

- 18.1 Section 77I of the RMA only grants Council's the power to impose qualifying matters over 'relevant residential zones'. A number of qualifying matters have been identified over zones which are not 'relevant residential zones', including industrial, specific purpose, open space, and rural zones.

- 18.2 Section 77O of the RMA grants Council's the power to impose qualifying matters over urban non-residential zones only to the extent necessary to accommodate a qualifying matter.

- 18.3 A recent Environment Court¹ case has considered the issue of qualifying matters and found that these must only relate to making the intensified density standards themselves less enabling. It is not a mechanism that enables further constraint to the status quo. Such an amendment to the District Plan would be ultra vires.

- 19 Secondly, Carter Group consider that in a number of cases, PC14 unnecessarily and inappropriately makes building height or density requirements less enabling, where operative provisions in the district plan already adequately accommodate qualifying matters. Those provisions provide scope to evaluate the appropriate height or density of buildings in the context of the qualifying matter and as such, additional regulatory controls or constraints that are less enabling are not necessary or appropriate. For example:

- 19.1 Heritage items and their settings are already addressed by provisions in chapter 9.3 that provide sufficient scope through resource consent processes to constrain building height or density, where that is warranted.

- 19.2 Natural hazards (including Flood hazard management areas, Coastal Hazard Management Areas, Slope instability management areas) are adequately addressed in chapter 5, within a framework that seeks to avoid or manage

¹ *Waikanae Land Company Limited v Heritage New Zealand Pouhere Taonga* [2023] NZEnvC 56.

hazard risks. That framework also provides scope to reduce density where appropriate.

19.3 Waterbody setbacks manage riparian margins and built form, earthworks and other activities in these margins, irrespective of the height or density of development.

- 20 Carter Group also opposes the Low Public Transport Accessibility overlay and qualifying matter as basis for dis-enabling building height or density. To the extent that deficiencies in accessibility to public transport may exist for parts of the City, this can be remedied over time to meet demands, through additional public investment, technological solutions, ride sharing (such as Uber Pool) and other initiatives. In the same way that the built form and density of communities is anticipated to change over time in response to the NPS-UD, it follows that community services and facilities (including public transport) will also change, and on this basis, the current provision of public transport should not hinder density and development capacity over the longer term.

Heritage items and settings

- 21 Carter Group owns land at 32 Armagh Street, known as the former Girls High Site (the *Site*). That land is partly covered by a heritage setting (heritage setting number 287) and includes a heritage item (the 'Blue Cottage' – heritage item number 390). The extent of the Site, and the heritage setting and item are shown below:



Figure 1: Site shown in yellow, approximate location of heritage setting shown in orange, and item location indicated by a red cross.

- 22 The District Plan statement of significance for the building notes, among other things, its historical significance as a c.1875 colonial cottage and its architectural significance due to the 'authenticity of its exterior and retention of some of its original interior detailing'. However, the building is in a poor state of repair with evident damage to its exterior and, as noted in the statement of significance, has had original architectural features removed over time. The heritage setting for the building is of no apparent significance in its own right – constituting a gravelled car park.
- 23 Accounting for these attributes, the building and setting are considered to be of little to no heritage value.
- 24 The scope of PC13 is broad and presents a timely opportunity to review the extent of the schedule of heritage items. Such a review is especially relevant in instances where additional information on individual items has become available following the District Plan Review. The provision of such information is integral to the need to carefully weigh costs and benefits of any proposed regulation (such as scheduling) under s 32 RMA.

25 For the reasons described above, the Blue Cottage's heritage status is considerably diminished and can no longer be considered significant. This building and its setting should no longer be included on the Schedule.

26 Carter Group therefore seeks that:

26.1 The Blue Cottage (Heritage Item 390) be removed from the Schedule of Significant Historic Heritage in Appendix 9.3.7.2 of the District Plan; and

26.2 Associated Heritage Setting 287 be removed from the same.

Proposed residential heritage areas and new rules relating to heritage

27 PC14 identified 11 new heritage areas into the District Plan (which have been proposed through plan change 13 (*PC13*)), with associated objectives, policies and rules. PC14 otherwise introduces a number of new rules for built development in the vicinity of heritage items.

28 Carter Group hold significant concerns over the introduction of these heritage areas and additional heritage related controls in general.

29 In regards heritage areas, the Site is located in the "Inner City West HA6" residential heritage area. As is clear from the figure above, the majority of the Site (and we would argue a large proportion of the heritage area itself) holds no heritage values whatsoever. It is therefore perplexing why these areas have been identified in this new overlay.

30 Carter Group further note that the Heritage Report and Site Record Forms for 'HA6 Inner City West' prepared by Dr Ann McEwan (which forms part of the proposed sub-chapter 9.3 provisions of PC14) records the 32 Armagh Street as a vacant lot with its contribution to the heritage area being 'intrusive'. The Blue Cottage is recorded as being located on 325 Montreal Street with its contribution to the heritage area being 'defining'. However, the proposed Site Contributions Map (also forming part of the proposed sub-chapter 9.3 provisions of PC14) identifies the whole site, including the vacant lot on 32 Armagh Street, as having a 'defining' contribution. This is wrong and internally inconsistent.

31 Carter Group also question the identified contribution of other sites within the "Inner City West HA6" residential heritage area, as the basis for then justifying the identification of a residential heritage area. By way of example, the YMCA Christchurch site occupies a substantial area and is assessed as making a 'defining' contribution to the proposed "Inner City West HA6" residential heritage area, despite featuring modern and partially-constructed multi-level commercial buildings of no apparent heritage merit. Other sites within the heritage area are also of questionable merit in terms of their contribution.

32 Carter Group are concerned about these errors, and the risk that errors such as this might be systemic throughout PC14. Given the strict regulations on development PC13 proposes, it is essential to ensure the provisions are accurate and justified. The heritage listings and corresponding rules within the District Plan currently

recognise and provide for the protection of historic heritage from inappropriate subdivision, use and development.

- 33 A number of the proposed heritage areas overlap with character areas already identified in the District Plan. It is not entirely clear why both of these overlays are required to protect historic heritage. The addition of a residential heritage area overlay will add unnecessary complexity and duplication in the interpretation of the District Plan.
- 34 Carter Group note that through the hearings on the proposed Christchurch District Plan, the Independent Hearings Panel determined that there was no basis to retain rules controlling development on sites adjacent to heritage items or settings in order to satisfy section 6(f) of the RMA. For the same reasons, it follows that the proposed provisions for Residential Heritage Areas, and the related 'Interface Sites' is not warranted. Similarly, there is no basis to impose more restrictive rules or less enabling built form standards on sites that adjoin or are in the vicinity of heritage items.
- 35 The Site's identification within a heritage area and the imposition of additional heritage-related rules or controls on development (beyond those otherwise set out in Chapter 9) is strongly opposed by the Carter Group, who seek that:
 - 35.1 the heritage areas in general (maps and associated provisions) are deleted; or
 - 35.2 the proposed "Inner City West HA6" residential heritage area is removed from PC14; or
 - 35.3 at the very least, the Site be removed from the proposed "Inner City West HA6" residential heritage area; and
 - 35.4 all heritage related rules or constraints on built form, that do not relate to listed heritage items and settings and which are not otherwise contained within sub-chapter 9.3 are deleted.

Significant and other trees

- 36 The Site already contains listed individual significant trees (T12 and T13) in the District Plan. The District Plan already provides a set of provisions for the protection of such trees.
- 37 PC14 proposes to introduce trees identified as 'qualifying matters'. It is understood that for a tree to be a 'qualifying matter' it must be assessed at over 100 years in age. It is not clear why this is also required in addition to its original listing in the District Plan. These provisions are not efficient or effective and the operative provisions managing development in the vicinity of listed trees are considered appropriate, effective and efficient.
- 38 T12 has been identified as a 'qualifying matter' tree. The assessment included in the section 32 report is brief and does not justify the inclusion of this tree as a

qualifying matter tree. Qualifying matters, given their restrictions on development rights of private property, should be thoroughly tested and assessed.

- 39 Carter Group also opposes the identification of two scheduled trees on the Site. Carter Group do not agree that the trees are of such significance as to warrant their listing and protection, particularly given that their retention significantly constrain the development capacity of the site. In Carter Group's views, these significant costs outweigh any benefits of scheduling. The listing of the 2 scheduled trees at 32 Armagh Street is inappropriate and should be deleted.

The New Regent Street heritage setting

- 40 Carter Group oppose the extent of the heritage setting for New Regent Street (being heritage setting 336 associated with heritage item 404 in Appendix 9.3.7.2 schedule).
- 41 Carter Group oppose the identification of this heritage setting to the northern most edge of Armagh Street and consider the setting should end at the southern most edge of Armagh Street, being where New Regent Street meets Armagh Street. Among other reasons, Carter Group consider that the modern buildings fronting Armagh Street at either end of New Regent Street or the Armagh Street road reserve have no apparent heritage values that warrant a heritage setting.
- 42 There is no basis for why this heritage setting extends as far as it does.

Central City Heritage Interface

- 43 Carter Group have interests in the land bounded by Oxford Terrace, Manchester Street, Armagh Street, and Colombo Street as shown below:



Figure 2: Approximate outline of site shown in yellow

- 44 Part of this site is subject to the proposed 'Central City Heritage Interface' overlay. This overlay is strongly opposed by the Carter Group. Carter Group considers there is no basis or justification for such an overlay over the Site. Among other reasons, Carter Group notes that the site has no identified heritage values and is surrounded by roads, that provide an adequate interface to and separation from other sites in the area, including those which may have heritage value.
- 45 It is also unclear why there are no objectives or policies introduced by PC14 into the Heritage Chapter of the plan in respect of these heritage interface sites. This gives very little direction to plan users as to their utility and/or relevance.
- 46 On this basis, Carter Group therefore seek:
- 46.1 the heritage interface overlays in general (maps and any associated provisions) are removed from PC13; or
 - 46.2 the Central City Heritage Interface relating to New Regent Street is removed; or
 - 46.3 at the very least, the Central City Heritage Interface is removed from the above site; and
 - 46.4 all heritage related rules or constraints on built form, that do not relate to listed heritage items and settings and which are not otherwise contained within sub-chapter 9.3 are deleted.

Tsunami Management Area

- 47 Carter Group opposes the introduction of the Tsunami Management Area (*TMA*) as notified in PC14 as a qualifying matter and seeks that these provisions be deleted in their entirety.
- 48 Carter Group consider the extent of the overlay is excessive and not appropriately commensurate with risk. The TMA appears to be based off a 2019 report by NIWA (the *NIWA Report*) 1 in 500 year tsunami event with 1.06m² sea level rise by 2120. This modelled scenario is too conservative in light of the serious development restrictions the overlay places on private property.
- 49 Carter Group are not aware of any other tier 1 local authority using a 1:500 year tsunami risk as a qualifying matter. The modelled scenario is inconsistent with the standard coastal risk approaches throughout the country:

Canterbury Regional Policy Statement

- 49.1 In the Canterbury Regional Policy Statement (*CRPS*) 'high hazard areas' (albeit they do not relate to tsunami's but rather coastal inundation and erosion) at (1) also refers to a 1:500 year event for flooding (being the equivalent of 0.2%AEP) where depths are greater than one metre.

² We note that the section 32 report incorrectly records this as being 1.6m at [6.16.2].

- 49.2 From our review of the NIWA Report, it appears the TMA notified includes all areas where inundation might occur from the tsunami scenario, where that is greater than 0m. In other words, land has been included in the TMA where depth will be far less than one metre in a 1:500 year event. It is difficult to see how the TMA is being justified in these areas.
- 49.3 Given the purpose of the TMA is to mitigate risk to life of people in the event of a tsunami, consideration should have been given to at which point that risk materialises. It is not appropriate to simply take the area from the NIWA report and convert this into an overlay without analysing the appropriateness of its extent any further.

The Greater Christchurch Partnership

- 49.4 The proposed TMA is larger than the Tsunami Inundation area identified by the Greater Christchurch Partnership as part of its consultation on the Greater Christchurch Spatial Plan (the *draft Spatial Plan*). The draft Spatial Plan maps include a map showing the Canterbury Coastal Natural Hazards. It is not clear why the TMA has not been mapped in a manner consistent with this map.

The tsunami evacuation area

- 49.5 The TMA is also similar to the Canterbury Tsunami Evacuation Zones. The commentary to these zones is as follows:

"Tsunami evacuation zones are areas that we recommend people evacuate from as a precaution after they feel a long or strong earthquake, or in an official tsunami advisory or warning. They encompass many different possible tsunami scenarios.

The area that would be flooded in any particular tsunami depends on many factors, including:

- the size of the earthquake*
- precisely how the earthquake fault moved*
- the direction the tsunami is coming from*
- the tide level when the largest waves arrive.*

Every tsunami will be different and we can never say for sure exactly which areas within a zone will be flooded. There is no one tsunami that would flood an entire zone.

We consider many different tsunami scenario models when drawing the tsunami evacuation zones. The inland boundary of the zones is based on several 'worst-case' scenarios – very rare tsunamis that we might expect once every 2500 years.

[emphasis added]

49.6 Environment Canterbury themselves recognise that:³

"... the tsunami evacuation zones are not appropriate for property-specific land use planning. Land use planning considers the sustainability of development in an area as well as life safety and wellbeing issues, whereas tsunami evacuation zones are fundamentally about life safety. For this reason, as explained above, the zones are generally conservative, and the yellow zone in particular represents an extreme event that we would only expect in the order of every 2500 years, which is beyond most land use planning time frames."

[emphasis added]

49.7 This further demonstrates the inappropriately conservative nature of the TMA.

The NIWA Report

49.8 The NIWA Report on which the TMA is based also recognises that the maps are highly conservative and caveats many of its own findings:

"Maps of the inundation extents should not be used at scales finer than 1:25,000. The overview maps are intended as a guide only and should not be used for interpreting inundation."

49.9 It is further noted the report was prepared with the intention of informing the Land drainage recovery program, and not specifically for the purposes of being applied as a qualifying matter to restrict development.

50 The costs of imposing such strict restrictions on development over such a conservative area significantly outweighs the benefits of reducing the risk of harm to people. Risk and development constraints need to be proportionate and appropriate.

51 Carter Group seeks that the TMA, and related provisions, be deleted in their entirety.

FINANCIAL CONTRIBUTIONS POLICY

52 The proposed tree canopy cover and financial contributions provisions are unworkable and unreasonable.

53 The provisions are difficult to understand and create considerable uncertainty. For example:

53.1 If trees are retained over and above the 20% cover threshold will a financial credit be provided to the applicant?

³ Review of tsunami evacuation zones for Christchurch City, Report No. R19/125, prepared by Helen Jack dated November 2019.

- 53.2 It is not clear who would be qualified to undertake the assessment of the canopy cover.
- 53.3 The proposed definitions of PC14 introduce the definition of a 'hedge' with specific reference to the tree canopy cover and financial contributions provisions, yet those provisions do not utilise that term.
- 53.4 If a stormwater basin is heavily planted in native shrubs, should this receive a credit as plants (and not just trees) also provide for carbon sequestration?
- 53.5 How will the timing of assessment work in relation to consenting processes? For greenfield subdivisions for example, landscape plans are often not completed until after resource consent is issued.
- 54 The canopy cover provisions would be difficult to enforce. If canopy cover is determined as acceptable at the time of resource consent and 10 years or 15 years later one or some of those trees are cut down, who monitors and enforces that requirement? Does Council have the staff resources to maintain that level of monitoring across wide swathes of the city?
- 55 Councils increasingly seek a reduction in reserve areas within greenfield subdivisions, on the basis of ongoing maintenance costs for the Council. It would be very difficult to achieve a 20% of net site area coverage in most greenfield subdivisions, noting that those reserve areas are also required for other purposes such as playground and open grass for play areas, that are incompatible with extensive tree canopy cover.
- 56 The provisions require 20% of the net site area adjacent to road corridors to contain tree cover. Accommodating tree cover typically necessitates wider road corridors. Wider road corridors reduces land available for housing, in direct conflict with the existing District Plan provisions stipulating a minimum density of 15 hh/ha must be achieved for greenfield subdivision areas, and more generally the NPS-UD.
- 57 The cost implications of not achieving tree cover are considerable and, given Carter Group does not consider the 20% cover is achievable, will add further to development costs that are then passed onto purchasers.
- 58 The implications of this proposed policy are significant from an economic perspective and must be adequately justified by the Council. As it stands, Carter Group do not consider the Council has done this and therefore the proposed financial contributions policy should be deleted in its entirety.

THE ZONING OF PARTICULAR SITES

- 59 Carter Group has interests at 332 Oxford Terrace, being the former Star and Garter Hotel site which was previously recognised in the Christchurch City Plan, by way of scheduling. The site has never had residential activity on it, it has remained undeveloped since the late 1990's and is likely to remain vacant pending an economically viable and efficient development opportunity for the land.

- 60 Whilst residential development in some form is likely for the site, provision for complementary commercial activities (food and beverage activities, small scale retail activity, community activity, etc at ground floor level) is desirable in order to support residents on the site and in the surrounding area and activate the site's three road frontages.
- 61 Accordingly, a mixed use zoning is necessary in order to facilitate mixed use development entailing residential and other activity, which would otherwise be precluded or highly uncertain under the proposed High Density Residential Zoning.
- 62 Accounting for the above, Carter Group consider Commercial Central City Mixed Use zoning is appropriate for the site and this should be amended on the planning maps.

Signed for and on behalf of Carter Group Limited by its solicitors and authorised agents
Chapman Tripp



Jo Appleyard
Partner
12 May 2023

Address for service of submitter:

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APPENDIX 1

No.	Provision	Position	Submission	Relief Sought
Chapter 1 Introduction				
1.	General feedback – 1.3.4.2	Neutral	PC14 proposes explanatory text regarding the potential infrastructure constraints for development that is enabled by the District Plan and PC14. The submitter considers this text is ultimately helpful to readers of the District Plan but is concerned at this possibility eventuating.	Retain as notified

No.	Provision	Position	Submission	Relief Sought
Chapter 2 Abbreviations and definitions				
1.	Definition - Accessory building	Oppose	<p>PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.</p> <p>For example, attached accessory buildings may require consent where they would otherwise be permitted in other zones (e.g. attached garages, solar heating devices, etc).</p>	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
2.	Definition of 'Alteration'	Oppose	The definition has the effect of meaning that any change, modification or addition to a heritage item, heritage setting or heritage fabric, or a building in a heritage area will constitute an 'alteration' and trigger corresponding rules and consent requirements, irrespective of whether it impacts on heritage fabric. This will create unnecessary, costly and inefficient consent requirements, and provide no benefits in respect of heritage.	Retain status quo.
3.	Definition - Building	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications (e.g. for swimming pools, decks, balconies, etc).	Retain status quo.
4.	Definition - Building Base	Oppose	This definition is opposed to the extent that it relates to the constraint of building heights, in a manner that is inconsistent with the NPS-UD and is not otherwise necessary or appropriate for the purposes of promoting intensification.	Delete

No.	Provision	Position	Submission	Relief Sought
5.	Definition - Building Tower	Oppose	This definition is opposed to the extent that it relates to the constraint of building heights, in a manner that is inconsistent with the NPS-UD and is not otherwise necessary or appropriate for the purposes of promoting intensification.	Delete
6.	Definition - Building Coverage	Oppose in part	The definition refers to 'building footprint' however that term is not coloured/underlined so as to refer to the corresponding definition.	Amend such that the term 'building footprint' is marked with reference to the corresponding definition of this term.
7.	Definition - Building Footprint	Oppose in part	The definition is not clear, insofar that it refers to refers to 'any section of any of those buildings that extends out beyond the ground floor level limits of the building and overhangs the ground'.	Amend to provide greater clarity.
8.	Definition of 'Contributory building'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Regardless, the proposed definition is vague and provides little certainty as to whether buildings would or would not constitute a contributory building.	Delete.
9.	Definition – Coverage	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
			between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.	
10.	Definition of 'Defining building'	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.</p> <p>Regardless, the proposed definition is vague and provides little certainty as to whether buildings would or would not constitute a defining building.</p>	Delete.
11.	Definition of 'Demolition'	Oppose	The amended definition has the effect of meaning that any destruction of a non-substantial part of a building constitutes 'demolition' and triggers corresponding rules and consent requirements. This will create unnecessary, costly and inefficient consent requirements for inconsequential partial demolition work, create conflict with the definition of 'alteration', and provide no benefits in respect of heritage.	Retain status quo.
12.	Definition – Development site	Support	The proposed definition sensibly enables sites to be defined and assessed for the purposes of compliance, notwithstanding that they may not fall within the mandatory definition of 'site' under the National Planning Standards.	Retain as notified.

No.	Provision	Position	Submission	Relief Sought
13.	Definition – Dripline	Oppose	This definition is deleted, evidently, on the basis that it will be replaced by a new definition of 'Tree protection zone radius'. The dripline definition is preferred on the basis that it is more readily understood.	Retain status quo.
14.	Definition – Fine grain	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete.
15.	Definition – Ground level	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.	Retain status quo.
16.	Definition – Gust Equivalent Mean (GEM)	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete.
17.	Definition – Habitable room	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation insofar that it refers to 'a similarly occupied room'.	Delete.

No.	Provision	Position	Submission	Relief Sought
18.	Definition – Heat island	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete.
19.	Definition – Hedge	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete.
20.	Definition – Height	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.	Retain status quo.
21.	Definition of 'Heritage setting'	Oppose	The amended definition removes the wording that a setting ' <i>together with the associated heritage item, has met the significance threshold</i> ' and instead states that ' <i>Heritage settings have not been assessed as meeting the significance threshold for scheduling</i> '. The submitter considers that heritage settings that do not meet the significance threshold for scheduling should not be listed, with associated regulatory requirements.	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
22.	Definition of 'Heritage Building Code works'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for insulation and glazing upgrades.	Retain as proposed.
23.	Definition – Human scale	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete
24.	Definition of 'Intrusive building or site'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Regardless, the proposed definition is vague and provides little certainty as to whether buildings or sites would or would not be intrusive.	Delete.
25.	Definition of 'Neutral building or site'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Regardless, the proposed definition is vague and provides little certainty as to whether buildings or sites would or would not be categorised as neutral.	Delete.
26.	Definition – Outdoor living space	Support	The definition provides greater clarity and certainty than the status quo.	Retain as notified.

No.	Provision	Position	Submission	Relief Sought
27.	Definition – Pedestrian access	Oppose	The definition (insofar as it refers to a 'dedicated pathway') precludes other forms of pedestrian access or shared spaces that adequately serve the same purpose.	Amend definition as follows: A dedicated pathway that provides access for pedestrians from the street to a residential unit and to any parking area for that residential unit
28.	Definition – Perimeter block development	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete
29.	Definition of 'Reconstruction'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for additional forms of reconstruction.	Retain as proposed.
30.	Definition of 'Relocation'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. As such, the submitter opposes the definition of relocation insofar that it relates to heritage areas. Further, the submitter opposes the deletion of the exclusions in (a) and (b) that otherwise sensibly exclude temporary relocation or realignment works.	Retain status quo.
31.	Definition of 'Repairs'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for additional forms of repairs.	Retain as proposed.

No.	Provision	Position	Submission	Relief Sought
32.	Definition – Residential unit	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.	Retain status quo.
33.	Definition of 'Restoration'	Supports	The amended definition provides greater clarity and certainty.	Retain as proposed.
34.	Definition – Site	Oppose	<p>PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.</p> <p>As noted above, the submitter supports the definition 'development site' and the use of this term in relevant rules.</p>	Retain status quo.
35.	Definition – Tree	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete or alternatively amend to specify a potential height of at least 3m.

No.	Provision	Position	Submission	Relief Sought
			Furthermore, the definition is unreasonably restrictive insofar that it specifies a minimum potential height of 5m.	
36.	Definition – Tree canopy cover	Oppose	The definition is very broad and relies on tree cover achieving expected growth over a 20 year time frame. It is unclear how the Council intends to cover the cost of enforcement over a 20+ year time frame for all new developments.	Delete
37.	Definition – Tree protection zone radius	Oppose	The definition is complex and is open to conflicting interpretation. The definition of 'dripline' is preferred.	Delete

No.	Provision	Position	Submission	Relief Sought
Chapter 3 Strategic Directions				
1.	Clause 3.1(v) Introduction	Support	The additional text appropriately recognises the need to ' <i>Facilitate an increase in the supply of housing, and provide for a wide range of housing types and locations, to give effect to the [relevant statutory] provisions enabling development...</i> '.	Retain as notified.
2.	Objective 3.3.2	Support	The objective is appropriate to ensure the effective and efficient preparation, change,	Retain as notified.

No.	Provision	Position	Submission	Relief Sought
			interpretation and implementation of the District Plan.	
3.	Objective 3.3.7	Oppose	The proposed wording in clauses (a)(i)-(iv) of this objective seeks to define a 'well-functioning urban environment' in a way that does not necessarily reflect, and risks narrowly framing, policy 1 of the NPS-UD. Whilst some aspects of these clauses are appropriate, others are not.	<p>Amend by deleting the text following the words 'into the future' as follows:</p> <p><i>3.3.7 Objective – Well-functioning urban environment</i></p> <p><i>a. 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></p> <p><i>i. Within commercial and residential zones</i></p> <p>...</p> <p><i>iv. The benefits of urban environments that support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.</i></p>
4.	Objective 3.3.8(viii)	Oppose	The proposed wording in clauses (viii) is not consistent with the requirements of NPS-UD policy 1. As worded, the proposed policy may require outcomes that are not practicable and are not required by NPS-UD policy 1.	<p>Amend as follows:</p> <p><i>viii. Has good Improves overall accessibility <u>for all and connectivity (including through opportunities for walking, cycling and public transport)</u> for people between housing, jobs, community services, natural spaces, and open spaces <u>including by way of public or active transport</u>, transport (including opportunities for walking, cycling and public transport) and services; and</i></p>

No.	Provision	Position	Submission	Relief Sought
5.	Objective 3.3.10(ii)(E)	Oppose	<p>Consistent with its submissions on sub chapter 6.10A, the submitter considers the provisions relating to tree canopy cover and financial contributions in their entirety are unworkable and onerous.</p> <p>The submitter further notes, that if the Council are wanting to enhance and grow the City's biodiversity and amenity this should also go hand in hand with Council agreeing to accept larger and more frequent recreational reserve areas. Over the past 5 – 7 years Council have pushed back against numerous developer proposals to increase reserve areas which would assist in meeting these proposed objectives.</p>	Delete.

No.	Provision	Position	Submission	Relief Sought
Chapter 5 Natural Hazards				
1.	Policy 5.2.2.5.1– Managing development in Qualifying Matter Coastal Hazard	Oppose	<p>The requirement in the policy to 'avoid' intensification is inconsistent with objectives 5.2.2.1.1 and 5.2.2.1.2 to avoid unacceptable risk and otherwise manage activities to address natural hazard risks. It is also inconsistent with policy 5.2.2.2.1(e) and (f) which seeks to manage such risks</p>	Delete.

No.	Provision	Position	Submission	Relief Sought
	Management Areas		<p>through the management of filling and building floor levels.</p> <p>Whilst site specific assessments provide a pathway for such development to occur, such a process is costly and uncertain, and equates risk with flood depth (rather than for example, floor level, building resilience, flood water velocity or duration, etc).</p> <p>Accounting for the above, the Coastal Hazard Management Areas should be subject to an equivalent regime to flood management areas, which provides for development (including intensification) as a permitted activity, subject to compliance with specified minimum floor levels.</p>	
2.	Policy 5.2.2.5.2– Managing development within Qualifying Matter Tsunami Management Area	Oppose	Consistent with the reasoning set out in the covering submission, the TMA is unreasonably conservative. Aside from the spatial extent of the TMA being opposed, the ‘avoidance’ directive in the policy is opposed for the same reasons expressed above in regards Policy 5.2.2.5.1.	Delete.
3.	Rules 5.4A	Oppose	For the reasons expressed above in regards Policy 5.2.2.5.1 and Policy 5.2.2.5.2 these rules are considered unreasonable, costly,	Delete.

No.	Provision	Position	Submission	Relief Sought
			inefficient, ineffective, and inappropriate. To the extent that flood hazards or high flood hazards exist, the operative FMA and HFHMA provisions are considered appropriate.	

No.	Provision	Position	Submission	Relief Sought
Chapter 6 General Rules & Procedures, Sub Chapter 6.1A Qualifying Matters				
1.	6.1A.1, Table 1 Qualifying Matters	Oppose	<p>Whilst the rationale for qualifying matters expressed in 6.1A.1(a) and (b) is acknowledged, a number of the matters identified in Table 1 are not warranted, accounting for the relevant matters in sections 77I or 77O.</p> <p>Among other reasons, a number of qualifying matters are considered to be less enabling of development to more than the extent necessary to accommodate the identified qualifying matters; and/or such matters have not been adequately evaluated and justified accounting for the costs imposed and the limitations on development capacity that is otherwise sought by the NPS-UD.</p> <p>The submitter is particularly concerned with qualifying matters relating to:</p>	Delete or otherwise amend Table 1 and the extent of Qualifying Matters in a manner consistent with the relief sought by the submitter on other provisions in PC14.

No.	Provision	Position	Submission	Relief Sought
			<p>(a) Heritage areas, items and their settings – noting the operative District Plan provisions relating to heritage adequately provide for such matters.</p> <p>(b) Natural hazards – noting operative District Plan provisions and the submission points above regarding proposed amendments to chapter 5.</p> <p>(c) Residential zones</p> <p>(d) Commercial zones</p>	

No.	Provision	Position	Submission	Relief Sought
Chapter 6 General Rules & Procedures, Sub Chapter 6.10A Tree Canopy Cover and Financial Contributions				
1.	General/all	Oppose	The provisions in their entirety concerning tree canopy cover and financial contributions (including related definitions and amendments to strategic objectives) are unworkable and onerous.	Delete all of the financial contributions draft provisions in their entirety.
2.	6.10A.1	Oppose	The provision begs the question: If trees are retained over and above the 20% cover threshold will a financial credit be provided to the applicant?	
3.	6.10A.1c	Oppose	Greenfield subdivision does not generally cause the loss of tree canopy cover, there is generally a net gain in	

No.	Provision	Position	Submission	Relief Sought
			<p>canopy cover as such subdivision is typically over open paddocks.</p> <p>Furthermore, Council itself has been responsible for a reduced canopy cover through the adoption of policies of density, road widths, off-sets from infrastructure, reduction in reserves to vest, all based around maintenance obligations and council budgets.</p>	
4.	6.10A.1d	Oppose	<p>There is currently no "Urban Forest Plan" setting out the Council target. Therefore, how is anyone expected to know if this is even realistic?</p> <p>This section also refers to financial contributions to cover the cost of tree pits construction within road corridors. This should exclude Greenfield sites where developers are already required as part of their subdivision consent to include street trees within new road corridors.</p>	
5.	Objective 6.10A.2.1	Oppose	<p>For the reasons expressed in the submission points above, the objective is generally opposed.</p> <p>Otherwise, the objective fails to account for the particular characteristics of residential activity, its location or other contextual matters that may make this objective unachievable or inappropriate. For example, residential activities within multi-level apartment buildings in the core of the Central City could not practicably '[maintain] <i>existing trees and/or</i> [plant] <i>new trees as part of the development</i>', as required by the objective.</p>	

No.	Provision	Position	Submission	Relief Sought
6.	Policy 6.10A.2.1.1	Oppose	For the same reasons expressed in regards Objective 6.10A.2.1 and otherwise noting the practical difficulties of monitoring and enforcing the tree canopy percentages over time, this policy is opposed.	
7.	Policy 6.10A.2.1.2	Oppose	<p>For the same reasons expressed in regards to the submission points above, the policy is opposed.</p> <p>Among other things, the maintenance of required tree canopy is impractical to monitor and enforce and requiring financial contributions from those who do not meet the requirements but not from those who may provide the canopy and subsequently remove it. This policy is inequitable and unworkable.</p>	
8.	Policy 6.10A.2.1.3	Oppose	<p>The requirements for tree planting (in terms of location, soil volume, etc) are unnecessarily and unreasonably prescriptive and remove property owners' reasonable freedom and choice to landscape their properties as they choose. Moreover, such requirements are difficult to monitor and enforce on an ongoing basis (e.g. as new owners or tenants choose to re-landscape) and are unnecessary accounting for the control or discretion in regards to these matters where trees are expressly required through resource consent processes.</p> <p>Consent notices in respect of tree planting are an unreasonable and onerous requirement, and are considered impracticable for enforcing residential landscaping which is commonly and regularly altered to reflect changing needs and preferences over time. Consent notices are likely to be overlooked or ignored,</p>	

No.	Provision	Position	Submission	Relief Sought
			<p>or impose costly and inefficient regulatory processes to retrospectively address landscaping works in breach of consent notices.</p> <p>Policies relating to trees in road reserve are unnecessary, noting that such trees can be adequately managed by Council in its capacity as road controlling authority.</p>	
9.	6.10A.3	Oppose	<p>The provisions in this section are generally opposed. Further, clause (c) is considered unclear, insofar as providing 'guidance' on tree species and other 'requirements' and whether these external documents will essentially be imposed as rules.</p>	
10.	6.10A.4	Oppose	<p>The rules are opposed in their entirety for the reasons expressed above.</p>	
11.	6.10A.4(a)	Oppose	<p>The explanatory note setting out the application of the rules is arbitrary, unclear and open to interpretation. Among other concerns, it requires a judgement of whether subdivision or development is 'able to contain a ground floor residential unit' irrespective of whether that is proposed, commercially viable, or otherwise.</p>	
12.	6.10.A.4.1	Oppose	<p>The rules are opposed in their entirety for the reasons expressed above and noting they are arbitrary, unclear and open to interpretation.</p> <p>Among other concerns, the rules apply to 'any residential development except for extensions or accessory buildings...', which might capture non-built</p>	

No.	Provision	Position	Submission	Relief Sought
			improvements (as residential development), such as hard or soft landscaping works, internal alterations, first floor additions, etc.	
13.	6.10.A.4.2	Oppose	<p>The rules are opposed in their entirety for the reasons expressed above and noting they are arbitrary, unclear and open to interpretation and debate. Aside from the monetary costs imposed by the rule, the administration of the rule imposes significant costs insofar as it requires an independent registered valuation.</p> <p>The rules are clearly in conflict with strategic objective 3.3.2.</p>	
14.	6.10.A.4.2.3	Oppose	<p>Consent notices in respect of tree planting are an unreasonable and onerous requirement, and are considered impracticable for enforcing residential landscaping which is commonly and regularly altered to reflect changing needs and preferences over time.</p> <p>Consent notices are likely to be overlooked or ignored, or impose costly and inefficient regulatory processes to retrospectively address landscaping works in breach of consent notices.</p>	

No.	Provision	Position	Submission	Relief Sought
Chapter 7 Transport				
1.	General/all	Oppose	The proposed provisions in their entirety concerning transport are onerous and	

No.	Provision	Position	Submission	Relief Sought
			unnecessary and are not necessary for the purposes of implementing the NPS-UD or the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.	Delete the proposed provisions to the Transport Chapter in their entirety.
2.	Policy 7.2.1.2 (xi) High trip generating activities	Oppose	Requiring the reduction of greenhouse gas emissions from vehicular trips associated with all high trip generating activities is not necessary, practicable or appropriate. Requirements for cycle parking and end of trip facilities, removal of minimum parking requirements, and non-statutory measures such as improved walking/cycling/PT facilities otherwise adequately reduce greenhouse gas emissions from vehicular trips.	
3.	Policy 7.2.1.9 Pedestrian Access	Oppose	The requirements of the policy are onerous, subjective and otherwise unnecessary accounting for the existing provisions in the plan concerning pedestrian access and urban design matters. The submitter is also concerned that requiring all pedestrian access to be of a width and grade suitable for all users, may not be appropriate or practicable in all cases.	
4.	Rule 7.4.3.7(b)	Oppose	For the reasons expressed in regards policy 7.2.1.9, the requirements for pedestrian access in this rule are opposed.	

No.	Provision	Position	Submission	Relief Sought
	Access Design			
5.	Rule 7.4.3.7(d) Access Design	Oppose	The requirement for either an audio and visual warning device or visibility splay for all sites on the same side of the road as a major cycle route in all zones, irrespective of the nature of the activity or its vehicle generation is unnecessary and onerous.	
6.	Rule 7.4.3.8 Vehicle Crossings And Rule 7.4.3.13 Co-location of Vehicle Crossings	Oppose	The requirements in 7.4.3.13 (as referred to in rule 7.4.3.8) are unnecessary, onerous and impractical. Among other concerns, the submitter notes that the rule creates a 'first in first served' situation for vehicle crossings which in greenfield residential areas may be problematic where adjoining sites are designed and / or obtain building consent, resource consents and / or vehicle crossing permits at a similar time with no knowledge of adjacent crossing positions.	
7.	Rule 7.4.4.18(a)(v ii) and advice note vii in Table 1 Assessment matters for	Oppose	For the reasons expressed in regards Policy 7.2.1.2 (xi) above, this assessment matter is opposed. Aside from those reasons, the submitter also considers it impractical from a commercial, monitoring and enforcement perspective to require ' <i>measures to be implemented and maintained over the lifetime of the activity</i> '.	

No.	Provision	Position	Submission	Relief Sought
	high trip generators			
8.	Rule 7.4.4.27 Assessment matters for pedestrian access	Oppose	For the reasons expressed in regards Policy 7.2.1.9 and Rule 7.4.3.7(b) above, this assessment matter is opposed.	
9.	Rule 7.4.4.28 Assessment matters for vehicle crossing co location	Oppose	For the reasons expressed in regards Rule 7.4.3.8 above, this assessment matter is opposed.	
10.	Table 7.5.2.1 – Minimum numbers of cycle parks required	Oppose	Increased requirements for cycle parking for social housing and residential units are opposed on the basis that the requirements are prescriptive and inflexible, and any additional cycle parking needs are best determined by the developer accounting for the needs of future residents, or informally provided as required. The proposed amendments will add unnecessary development costs, or onerous consenting requirements and will likely reduce development capacity.	

No.	Provision	Position	Submission	Relief Sought
11.	Table 7.5.3.1 – Minimum numbers of loading spaces required	Oppose	<p>Requirements for on-site loading for residential activities are opposed on the basis that the requirements are prescriptive and inflexible, and any loading needs are best determined by the developer accounting for the needs of future residents, or informally provided as required (including through on-street loading facilities).</p> <p>Requiring on-site loading (where car parking is not otherwise required and loading is not presently required) will reduce development capacity and/or significantly increase the costs of development, accounting for the corresponding requirements for on-site access (and other requirements, such as on site turning, vehicle crossing constraints, etc) to facilitate on site loading. Informal loading, or temporary or permanent loading on-street is more effective, efficient and appropriate.</p> <p>The proposed amendments will otherwise add unnecessary development costs, or onerous consenting requirements.</p>	
12.	Appendix 7.5.7 Access design and gradient	Oppose	<p>The amended requirements for access are unnecessary and will result in unreasonable development costs, reduced development capacity, and/or onerous consenting requirements.</p>	

No.	Provision	Position	Submission	Relief Sought
Chapter 8 Subdivision, Development and Earthworks				
1.	8.1 Introduction	Oppose in part	To the extent that additional wording is proposed that specifically refers to 'development' a definition or further clarification of what this term relates to is necessary. In the absence of such clarification, the term is unclear and open to interpretation	Delete, or provide a definition or explanation of the term 'development'.
2.	8.2.2.2 Policy Allotments	Support	The amendments are pragmatic and support the provision of increased development capacity or alternative forms of housing supply and associated changes in tenure.	Retain.
3.	Policy 8.2.2.7 Urban density	Support	The amendments are pragmatic and support the provision of increased development capacity, whilst sensibly recognising constraints to achievement of minimum yields and other development constraints.	Retain.
4.	Objective 8.2.3 Infrastructure and transport	Support	The objective sensibly provides for engineering solutions that do not affect the 'existing' capacity of the wastewater system, without prescriptively limiting what those solutions may entail.	Retain.

No.	Provision	Position	Submission	Relief Sought
5.	Policy 8.2.3.1 Infrastructure constraints	Oppose in part	To the extent that additional wording is proposed that specifically refers to 'development' a definition or further clarification of what this term relates to is necessary. In the absence of such clarification, the term is unclear and open to interpretation	Delete, or provide a definition or explanation of the term 'development'.
6.	Policy 8.2.3.2 Availability of infrastructure	Oppose in part	To the extent that additional wording is proposed that specifically refers to 'development' a definition or further clarification of what this term relates to is necessary. In the absence of such clarification, the term is unclear and open to interpretation. Clause (g) is otherwise supported for the same reasons expressed in respect of objective 8.2.3 above.	Delete, or provide a definition or explanation of the term 'development'.
7.	Objective 8.2.6 and policies 8.2.6.1-8.2.6.3 Urban tree canopy cover	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete
8.	Rule 8.3.1 (e) and (f)	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter	Delete

No.	Provision	Position	Submission	Relief Sought
	Urban tree canopy cover		6.10A, these provisions are opposed in their entirety.	
9.	Rule 8.3.3 (b) financial contributions	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete
10.	Rule 8.3.7 consent notice	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete
11.	Rule 8.4.1.1 Notification	Support	The amended notification requirements are supported, accounting for the directions in the EHS Act.	Retain as notified.
12.	Rule 8.5	Support	The provisions are generally supported, to the extent that they are consistent with the submitters other submission points.	Retain as notified.
13.	Rule 8.6.1 Table 1 – Minimum net site areas - residential	Oppose in part	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.</p> <p>Further, the proposed 450m2 minimum net site area is opposed on the basis that it conflicts with the objectives in the NPS-UD and District Plan to provide for the most intensive and efficient scale and form of development within Central City areas.</p>	Delete.

No.	Provision	Position	Submission	Relief Sought
14.	Rule 8.6.1 Tables 2 – 5 Minimum net site areas – other zones	Support	The amendments proposed to Tables 2-5 are supported.	Retain the changes as proposed to Rule 8.6.1 Tables 2 – 5.
15.	Rule 8.7.12 Tree canopy assessment matters	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete.
16.	8.9 Rules- Earthworks	Support	The amended provisions in rule 8.9 are generally appropriate.	Retain as notified.

No.	Provision	Position	Submission	Relief Sought
Chapter 9 Natural and Cultural Heritage, Sub Chapter 9.3 Historic Heritage				
1.	Policy 9.3.2.2.2 Identification, assessment and scheduling of heritage areas	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.	Delete.

No.	Provision	Position	Submission	Relief Sought
2.	Policy 9.3.2.2.3 - Management of scheduled historic heritage	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.</p> <p>The amendments to clause (b) of this policy are also opposed. The operative wording within this policy sensibly recognises that Significant (Group 2) heritage items are potentially capable of accommodating a greater degree of change than Highly Significant (Group 1) heritage items.</p>	Retain status quo.
3.	Policy 9.3.2.2.5 Ongoing use of scheduled historic heritage	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to this policy are opposed.</p>	Retain status quo.
4.	Policy 9.3.2.2.8- Demolition of scheduled historic heritage	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to clause (a) of this policy are opposed.</p> <p>In addition, the changes to clause (a)(ii) are opposed insofar that they introduce a new 'test' for evaluating the demolition of historic heritage that presents an unreasonable and inappropriate threshold that materially changes and undermines the policy. By way</p>	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
			of example, the proposed wording may preclude the demolition of heritage items that are significantly (physically) compromised, on the basis of one or more (non-physical) heritage values (e.g. historical/social or cultural/spiritual value) remaining.	
5.	Rule 9.3.3 How to interpret and apply the rules	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to this rule, insofar that they relate to heritage areas are opposed.	Delete all references to heritage areas.
6.	9.3.4 Rules-Historic heritage	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, changes to this rule, insofar as they relate to heritage areas are opposed.	Delete all references to heritage areas within rule 9.3.4, including (and in particular) rules RD6-RD8.
7.	Matters of discretion 9.3.6.1(a)	Oppose	The submitter opposes the deletion of clause (a), given that damage incurred as a result of the Canterbury earthquakes of 2010 and 2011 including the costs of repair and reconstruction, remains a relevant matter for consideration.	Retain status quo for 9.3.6.1(a).
8.	Matters of discretion 9.3.6.1(p)	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated	Delete proposed 9.3.6.1(p).

No.	Provision	Position	Submission	Relief Sought
			in the covering submission. Accordingly, the matters under clause (p) are opposed.	
9.	Matters of discretion 9.3.6.4	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters in rule 9.3.6.4 are opposed.	Delete proposed rule 9.3.6.4.
10.	Matters of discretion 9.3.6.5	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters in rule 9.3.6.5 are opposed.	Delete proposed rule 9.3.6.5.
11.	Matters of discretion 9.3.6.6	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters in rule 9.3.6.6 are opposed.	Delete proposed rule 9.3.6.6.
12.	Appendix 9.3.7.2 Schedule of Significant Historic	Oppose	For the reasons stated in the covering submission, the listing of the item and setting at 32 Armagh Street (and 325 Montreal Street) is inappropriate. Accordingly, this listing should be deleted.	Delete Heritage Item 390 and Heritage Setting 287 regarding 32 Armagh Street from Appendix 9.3.7.2.

No.	Provision	Position	Submission	Relief Sought
	Heritage Items			
13.	Appendix 9.3.7.3 Schedule of Significant Historic Heritage Areas	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to this schedule are opposed.	Retain status quo.
14.	Appendix 9.3.7.4 Heritage item and heritage setting exemptions	Oppose	The exemptions provided in Appendix 9.3.7.4 are an important tool for incentivising the adaptive reuse and ongoing protection of heritage items. As such, the amendments proposed to this appendix which reduce the extent of exemptions is inconsistent with the Plan's objectives in relation to heritage and section 6 of the Act.	Retain the status quo.
15.	Appendix 9.3.7.7 – Residential Heritage Areas - Aerial Maps	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Appendix 9.3.7.7 should be deleted.	Delete.
16.	Appendix 9.3.7.8 – Residential Heritage	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated	Delete.

No.	Provision	Position	Submission	Relief Sought
	Areas – Site Contributions Maps		in the covering submission. Accordingly, Appendix 9.3.7.8 should be deleted.	
17.	Appendix 9.3.7.9 – Residential Heritage Areas – Interface Sites and Character Area Overlay Maps	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Appendix 9.3.7.9 should be deleted.	Delete.

No.	Provision	Position	Submission	Relief Sought
Chapter 9 Natural and Cultural Heritage, Sub Chapter 9.4 Significant and Other Trees				
1.	General / all Including: 9.4.1 (c) Introduction; Policy 9.4.2.2.3 Tree Protection; 9.4.3(a) & (f) how to	Oppose.	The submitter opposes the identification of selected scheduled trees as qualifying matters. The operative provisions relating to scheduled trees provide sufficient protection for such trees (including development buffers) and the presence of trees need not preclude more intensive forms of development.	Delete.

No.	Provision	Position	Submission	Relief Sought
	interpret and apply the rules; and 9.4.4. Rules			
2.	Appendix 9.4.7.1 Schedules of significant trees	Oppose in part	<p>Two scheduled trees are identified for the property at 32 Armagh Street. The submitted does not agree that the trees are of such significance as to warrant their listing and protection, particularly given that their retention significantly constrain the development capacity of the site. In the submitter's views, these significant costs outweigh any benefits of scheduling.</p> <p>For these reasons, the listing of the 2 scheduled trees at 32 Armagh Street is inappropriate and should be deleted.</p>	Amend Appendix 9.4.7.1, so as to delete the scheduling of the common lime and variegated sycamore trees at 32 Armagh Street.

No.	Provision	Position	Submission	Relief Sought
Chapter 13.6 SP School				
1.	Policy 13.6.2.1.2 Effects on neighbourhoods	Support	The amended wording of this policy heading better reflects the provisions in the NPS-UD and is supported.	Adopt.

No.	Provision	Position	Submission	Relief Sought
2.	13.6.4.1.3 Restricted discretionary activities	Support	The amended wording within the table (insofar as it refers to 'Effects on...') better reflects the provisions in the NPS-UD and is supported.	Adopt.
3.	13.6.4.1.3 RD5	Support in part	The proposed rule is generally supported, however restricted discretionary status is not 'enabling' and accounting for the development intensity envisaged by the NPS-UD in high density residential areas, the submitter considers controlled activity status for this provision is more appropriate.	Amend rule 13.6.4.1.3 RD5, such that it is a controlled activity standard.
4.	13.6.4.2 (a)	Oppose	<p>This rule states that built form standards do not apply to those parts of school sites occupied by heritage items and settings, with development otherwise controlled by Chapter 9.3 Historic Heritage.</p> <p>The submitter considers that the built form standards remain a relevant basis for establishing permitted built form, given that the heritage provisions in chapter 9.3 will otherwise provide a framework for determining whether that built form is appropriate in the context of relevant heritage values.</p> <p>In the absence of built form standards applying (as is proposed), users of the Plan will have considerable uncertainty as to what</p>	Delete.

No.	Provision	Position	Submission	Relief Sought
			built form may or may not be appropriate to the site and locality generally.	
5.	13.6.4.2.1 Maximum site coverage	Oppose in part	The submitter opposes the amendments to the rule, to the extent that it will impose greater constraints on building site coverage than the status quo. This will limit development capacity in a manner that is inconsistent with the NPS-UD.	Retain the status quo, insofar that the amendments propose greater constraints on building site coverage than the status quo.
6.	13.6.4.2.2 Height in relation to boundary	Oppose in part	The submitter opposes the amendments to the rule, to the extent that it will impose greater constraints on building height in relation to boundaries than the status quo. This will limit development capacity in a manner that is inconsistent with the NPS-UD.	Retain the status quo, insofar that the amendments propose greater constraints on building height in relation to boundaries than the status quo.
7.	13.6.4.2.3 Minimum building setback from road boundaries	Oppose in part	The submitter opposes the amendments to the rule, to the extent that it will impose greater building setbacks from road boundaries than the status quo. This will limit development capacity in a manner that is inconsistent with the NPS-UD.	Retain the status quo, insofar that the amendments propose greater building setbacks from road boundaries than the status quo.
8.	13.6.4.2.4 Minimum building setback from internal boundaries	Oppose in part	The submitter opposes the amendments to the rule, to the extent that it will impose greater building setbacks from internal boundaries and/or constraints on building length, relative to the status quo. This will	Retain the status quo, insofar that the amendments propose greater building setbacks from internal boundaries and/or constraints on building length, relative to the status quo.

No.	Provision	Position	Submission	Relief Sought
	and maximum building length		limit development capacity in a manner that is inconsistent with the NPS-UD.	
9.	13.6.4.2.5 Maximum building height	Support	The amendments better enable development capacity and are supported.	Adopt.
10.	13.6.4.2.6 Landscaping	Oppose	The submitter opposes this new rule, noting it will limit development capacity in a manner that is inconsistent with the NPS-UD.	Delete.
11.	13.6.5.1 Effects on the neighbourhood	Oppose	The submitter opposes the proposed amendments to the assessment matter, noting it will impose additional constraints on and uncertainty for developments, and in doing so will limit development capacity in a manner that is inconsistent with the NPS-UD.	Delete.

No.	Provision	Position	Submission	Relief Sought
Chapter 14 Residential				

No.	Provision	Position	Submission	Relief Sought
Objectives & Policies				
1.	Objective 14.2.1	Support	The amendments to the objective are appropriate and better reflect the provisions of the NPS-UD.	Adopt.
2.	Policy 14.2.1.1	Support	The amendments to the policy are appropriate and better reflect the provisions of the NPS-UD. They otherwise appropriately remove unnecessarily prescriptive references to minimum densities for different zones.	Adopt.
3.	Policy 14.2.1.2	Support	The deletion of the policy is supported.	Adopt
4.	Policy 14.2.1.2	Support	The deletion of the policy is supported, accounting for the changes proposed in response to the NPS-UD and Amendment Act.	Adopt
5.	Policy 14.2.1.3	Support	The deletion of the policy is supported, accounting for the changes proposed in response to the NPS-UD and Amendment Act.	Adopt
6.	Policy 14.2.3.6	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt

No.	Provision	Position	Submission	Relief Sought
7.	Policy 14.2.3.7	Oppose	The proposed policy is opposed, insofar as it states that increased buildings heights should 'only' be provided for where the matters listed in i-v. of the policy are achieved. Such requirements are not required by or consistent with the NPS-UD and Amendment Act.	Delete.
8.	Objective 14.2.5	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
9.	Policy 14.2.5.1	Oppose	The proposed policy is opposed, insofar as it stipulates site layout and building design requirements that are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.	Delete.
10.	Policy 14.2.5.2	Support	The proposed amendments to the policy are supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
11.	Policy 14.2.5.3	Oppose	The proposed policy is opposed, insofar as it stipulates site layout and building and landscaping design requirements that are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.	Delete.

No.	Provision	Position	Submission	Relief Sought
12.	Policy 14.2.5.4	Oppose	The proposed policy is opposed, insofar as it stipulates on site waste and recycling requirements that are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.	Delete.
13.	Policy 14.2.5.5	Oppose	<p>The proposed policy is opposed, insofar as it stipulates wind management requirements that are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.</p> <p>The submitter is particularly concerned at the cost and practical implications of providing assessments in accordance with this policy, noting the highly specialised expertise required (with associated cost, availability and time implications).</p> <p>The submitter is also concerned at the potentially subjective nature of aspects of the policy.</p>	Delete.
14.	Policy 14.2.5.6	Support	The proposed amendments to the policy are supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
15.	Objective 14.2.6	Support	The proposed objective is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.

No.	Provision	Position	Submission	Relief Sought
16.	Policy 14.2.6.2	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
17.	Objective 14.2.7	Support	The proposed objective is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
18.	Policy 14.2.7.1	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
19.	Policy 14.2.7.2	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
20.	Policy 14.2.7.3	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
21.	Policy 14.2.7.4	Support in part	The proposed policy is generally supported, accounting for the directives within the NPS-UD and Amendment Act. However, the submitter is concerned as to the potentially inappropriate constraints on development resulting from the words 'and restrict development to solely within...'. 	Amend to delete the words ',and restrict development to solely within,'.
22.	Policy 14.2.7.5	Support	The proposed policy is generally supported, accounting for the directives within the NPS-UD and Amendment Act. However, the	Amend to delete the words ',and restrict development to solely within,'.

No.	Provision	Position	Submission	Relief Sought
			submitter is concerned as to the potentially inappropriate constraints on development resulting from the words 'and restrict development to solely within...'.	
23.	Policy 14.2.7.6	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
24.	Objective 14.2.8	Support	The proposed objective is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
Rules Introduction				
1.	14.3 (f)	Oppose	For the reasons set out in their submission on sub chapter 6.1A, the submitter opposes the extent of qualifying matters listed and seeks that this rule be amended in a manner consistent with the relief sought on that chapter.	Delete, in a manner consistent with the submission on chapter 6.1A.
RS and RSDT Zones				
1.	Rule 14.5.3.1.3 Area-specific restricted discretionary activities	Oppose.	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 14.5.3.1.3 should be deleted.	Delete.

No.	Provision	Position	Submission	Relief Sought
2.	Rule 14.4.2.2 Tree and garden planting	Oppose	The proposed amendments incorporating tree planting rules are opposed for the reasons expressed in regards Chapter 6.10A.	Delete.
RMD Zones				
1.	Rule 14.5	Oppose	<p>The submitter generally opposes any/all amendments to the RMD zone provisions, to the extent that these conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.</p> <p>In the submitter's view, such requirements are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.</p> <p>Specific provisions of concern are further noted in the submission points below.</p>	Delete all new or amended provisions, to the extent that they conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.
2.	Rule 14.5.2 Built form standards	Oppose	<p>Proposed new built form standards or amendments to existing standards are opposed to the extent that they conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.</p> <p>Specific amendments requiring deletion include:</p>	Delete all new or amended provisions, to the extent that they conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.

No.	Provision	Position	Submission	Relief Sought
			<p>Rule 14.5.2.2 (c)-(e) – landscaping & tree canopy</p> <p>Rule 14.5.2.9 - fences</p> <p>Rule 14.5.2.12 – ground floor habitable room</p> <p>Rule 14.5.2.13 – service, storage & waste spaces</p> <p>Rule 14.5.2.15 – garaging and carport location</p> <p>Rule 14.5.2.17 – location of mechanical ventilation</p> <p>Rule 14.5.2.18 – City Spine Transport corridor</p>	
3.	Rule 14.5.2.4 (c) Site coverage	Support	The exemption for eaves and roof overhangs is supported.	Adopt.
4.	Rule 14.5.3.1.3 Area-specific restricted discretionary	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 14.5.3.1.3 RD15 should be deleted.	Delete.

No.	Provision	Position	Submission	Relief Sought
	activities RD15			
5.	Rule 14.5.3.2 Area-specific built form standards	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 14.5.3.2 should be deleted, insofar that this concerns heritage areas. This includes:</p> <p>Rule 14.5.3.2.3 Building Height</p> <p>Rule 14.5.3.2.7 Residential units per site</p> <p>14.5.3.2.8 Setbacks</p> <p>14.5.3.2.9 Building coverage</p> <p>14.5.3.2.10 Outdoor living space per unit</p>	<p>Delete the following rules, insofar that they refer to Heritage areas:</p> <p>Rule 14.5.3.2.3 Building Height</p> <p>Rule 14.5.3.2.7 Residential units per site</p> <p>14.5.3.2.8 Setbacks</p> <p>14.5.3.2.9 Building coverage</p> <p>14.5.3.2.10 Outdoor living space per unit</p>
High Density Residential Zone Provisions				
1.	Rule 14.6	Oppose	<p>The submitter generally opposes any/all amendments to the High Density Residential zone provisions, to the extent that these conflict with or are less enabling than the mandatory MDRS, the directives in NPS-UD policy 3, and/or impose additional constraints relative to the status quo.</p> <p>In the submitter's view, such requirements are not otherwise required by, or are</p>	<p>Delete all new or amended provisions, to the extent that they conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.</p>

No.	Provision	Position	Submission	Relief Sought
			<p>inconsistent with, the NPS-UD and Amendment Act.</p> <p>Specific provisions of concern are further noted in the submission points below.</p>	
2.	Rule 14.6.1.3	Oppose	<p>Rules 14.6.1.3 RD6-RD23 entail requirements that are onerous, inefficient and ineffective and which will limit development capacity. Such requirements are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.</p> <p>A number of these standards are complex or unclear and do not accord with the requirements of objective 3.3.2.</p> <p>As restricted discretionary activities, these standards are not enabling of development, as required by the Amendment Act. If such standards are found to be appropriate, they should be imposed as controlled activity standards.</p>	Delete, to the extent that the proposed amendments conflict with or are less enabling than the mandatory MDRS.
3.	Rule 14.6.2.1 Building height	Oppose, in part	<p>Whilst provision for increased building height is supported, a 14m building height is inadequate for a high density residential zone within the central city, where Policy 3 (c) of the NPS-UD directs that development of up to six stories is to be 'enabled'.</p>	Amend, so as to provide for a 23m maximum building height.

No.	Provision	Position	Submission	Relief Sought
			In order to 'enable' development of up to six stories a height limit of 23m as a permitted activity is required for this zone.	
4.	Rule 14.6.2.2 height in relation to boundary And Appendix 14.16.2	Oppose	<p>The submitter opposes the height in relation to boundary QM and submits that only the angles and heights that must be included from Schedule 3A, Part 2, Density Standards (12) Height in Relation to Boundary of the Housing Supply Act be included in the District Plan.</p> <p>The QM/ appendix compromises the enablement of development and does not reduce regulatory constraints and increase housing supply as required through the Amendment Act and the NPS-UD.</p>	Amend Rule 14.6.2.2 and Appendix 14.16.2, to align with Schedule 3A, Part 2, Density Standards (12) Height in Relation to Boundary of the Amendment Act.
5.	Rule 14.6.2.5 Building separation	Oppose	The requirements of this rule are not required by and are inconsistent with, the NPS-UD and Amendment Act.	Delete.
6.	Rule 14.6.2.6 Fencing and screening	Oppose	The requirements of this rule are not required by and are inconsistent with, the NPS-UD and Amendment Act.	Delete.
7.	Rule 14.6.2.7 Landscaping and tree canopy cover	Oppose	The requirements of this rule are not required by and are inconsistent with, the NPS-UD and Amendment Act. The requirements will limit development capacity	Delete.

No.	Provision	Position	Submission	Relief Sought
			and are otherwise opposed for the reasons expressed in the submission on chapter 6.10A.	
8.	14.6.2.12 Building Coverage	Oppose	<p>50% site coverage is not appropriate in the HRZ Zone given that there are currently no building coverage limitations in the Residential Central City Zone. This rule is more restrictive than the current operative provisions. There should be no site coverage limit in the HRZ.</p> <p>The rule compromises the extent to which planning provisions enable development and does not reduce regulatory constraints and increase housing supply as required through the Amendment Act and the NPS-UD.</p>	Delete.
9.	<p>Rule 14.15.3(a) impacts on neighbouring property</p> <p>Matters of control and discretion</p>	Oppose	<p>The submitter considers that Clause 14.15.3 (a) need simplifying and amending to ensure it appropriately addresses the rules to which it relates. The rule is headed 'impacts on neighbouring properties' yet many of the matters do not relate to effects on neighbouring properties. The long list of matters is not in accordance with the enabling provisions of the NPS-UD.</p> <p>The extent of discretion compromises the extent to which planning provisions enable development and does not reduce regulatory constraints and increase housing supply as</p>	<p>Amend rule 14.15.3(a) as follows:</p> <p><i>a. Whether the increased height, or reduced setbacks, or recession plane intrusion would result in buildings that do not compromise the amenity of adjacent properties planned urban built character, taking into account. The following matters of discretion apply...</i></p> <p>[i.e. delete the balance of clause (a)]</p>

No.	Provision	Position	Submission	Relief Sought
			required through the Amendment Act and the NPS-UD.	

No.	Provision	Position	Submission	Relief Sought
Chapter 15 Commercial				
Chapter 15 objectives & policies:				
1.	General feedback re policies	Oppose	PC14 fails to include policy provisions that explicitly implement the NPS-UD directives in Policy 3 in regards to building height and provide clear expectations in regards to the heights of buildings, particularly in the central city.	Insert a new and explicit policy in regards to anticipated building heights, consistent with NPS-UD policy 3.
2.	Policy 15.2.2.1 (Role of Centres)	Support with amendment	<p>Amendments anticipating 'high' rather than 'medium' density housing in and around town centre and local centre zones are generally supported.</p> <p>In respect of Table 15.1, Avonhead Mall is identified as a 'small' Local Centre, which has corresponding implications in respect of development potential. In respect of building height especially, such centres are constrained to 12m building height which is equivalent to the height permitted in surrounding residential zones and limits the</p>	Amend Table 15.1 to reclassify Avonhead as a Local Centre (<u>large</u>), rather than Local Centre (small).

No.	Provision	Position	Submission	Relief Sought
			<p>potential/practical intensification of this commercially zoned land resource.</p> <p>Given the extent of intensification provided for in the surrounding residential catchment (and likely increase in population as a consequence) and the absence of other commercial centres and activity in this catchment, a corresponding level of intensification at Avonhead mall is appropriate.</p> <p>Such intensification could occur without escalating the status of Avonhead in the commercial centres hierarchy (to a TCZ) by reclassifying the centre as a Local Centre (large).</p>	
3.	Objective 15.2.3 (Office parks & mixed use areas)	Support	The wording of this provision is generally supported.	Adopt.
4.	Policy 15.2.3.2 (Mixed use areas)	Support	The wording of this provision is generally supported.	Adopt.

No.	Provision	Position	Submission	Relief Sought
5.	Objective 15.2.4 (urban form, scale & design outcomes)	Support with amendment	<p>With the exception of clauses (a)(iv) and (vi) the wording is supported.</p> <p>In respect of clause (a)(iv) and (vi) the requirement for individual developments to 'manage adverse effects... that contribute to climate change' and 'support a reduction in greenhouse gas emissions' is uncertain and difficult to apply/administer for individual applications.</p> <p>Whilst such objectives are commendable, they should be directed at broader patterns of development rather than individual applications.</p>	<p>Amend clause (a)(iv) and (vi) as follows:</p> <p><i>iv. manages adverse effects (including reverse sensitivity effects) on the site and surrounding environment, including effects that contribute to climate change; and</i></p> <p><i>... vi. Promotes a zoning and development framework that supports a reduction in greenhouse gas emissions.</i></p>
6.	Policy 15.2.4.1 (Scale & form of development)	Oppose in part	<p>The proposed amendments to clause (a) of this policy introduce wording that is unclear, subjective and inappropriate. Clause (a) also seeks to constrain building heights and form within the central city in a manner that is inconsistent with the NPS-UD and the Amendment Act.</p> <p>Clause (b) of the policy is supported.</p>	<p>Delete the amendments to clause (a) of the policy.</p> <p>Adopt the amendments to clause (b) of the policy.</p>
7.	Policy 15.2.4.2 (Design of new development)	Oppose in part	<p>Clause (a) of this policy 'requires' new development to meet the various requirements listed in sub-clauses (i)-(x). Accordingly, it is important that those requirements are appropriately framed in terms of the outcomes sought, the certainty</p>	<p>Amend clause (a) of the policy as follows:</p> <p><i>a. Require new development to be well-designed and laid out by:</i></p> <p>...</p>

No.	Provision	Position	Submission	Relief Sought
			<p>they provide and the extent to which they support the purpose of PC14 to 'enable a greater scale and density of residential and business development in urban areas'.</p> <p>Against this context, the proposed amendments to this policy are opposed on the basis that they are uncertain, unreasonable, and/or do not support the purpose of PC14.</p> <p>Proposed amendments to the balance of the policy are supported.</p>	<p>viii. achieving a visually <u>appealing attractive</u> setting when viewed from the street and other public spaces, <u>that embodies a human scale and fine grain</u>, while managing effects on adjoining environments;</p> <p>[delete proposed clauses x-xv.]</p> <p>Retain the balance of the policy and amendments as proposed.</p>
8.	<p>Policy 15.2.5.1</p> <p>(Cathedrals in the Central City)</p>	Oppose in part	<p>This policy seeks to 'Provide for the individual design, form and function of new spiritual facilities and associated buildings at 100 Cathedral Square and 136 Barbadoes Street'.</p> <p>The policy is appropriate, but PC14 should amend the wording to recognise the establishment of a new cathedral for the Catholic Diocese of Christchurch in the city block bounded by Colombo / Armagh / Manchester Streets and Oxford Terrace (not 136 Barbadoes Street).</p> <p>Given that the purpose of PC14 is to support intensification, amendments to the policy to support the establishment of the new cathedral (and its design, form and function</p>	<p>Amend policy 15.2.5.1 as follows:</p> <p>a. Provide for the individual design, form and function of new spiritual facilities and associated buildings at 100 Cathedral Square, and 136 Barbadoes Street, <u>and within the city block bounded by Colombo Street, Armagh Street, Manchester Street and Oxford Terrace</u> that:</p>

No.	Provision	Position	Submission	Relief Sought
			requirements) on its central city site is appropriate.	
9.	Policy 15.2.6.3 (Amenity)	Oppose in part	The proposed wording in clause (a)(ii) is opposed, insofar that this relates to constraints on built form which limit development capacity in a manner that is inconsistent with the NPS-UD and Amendment Act.	Delete the proposed amendments in clause (a)(ii).
10.	Policy 15.2.6.4 (Residential intensification)	Oppose in part	<p>Whilst <i>some</i> of the proposed additions to this policy concern matters that may be relevant considerations for new residential developments (e.g. as assessment matters), <i>requiring</i> such matters within the policy potentially escalates their importance and may impose a 'policy barrier' to applications where the provision these requirements is not appropriate, necessary, or practicable.</p> <p>And, as set out in other submission points, a number of these matters are considered unnecessary and inappropriate, for the purposes of promoting intensification.</p> <p>Accordingly, the proposed additions to the sub-clauses within the policy should be deleted.</p>	Delete the proposed amendments in clauses (a)(vi)-(viii).
11.	Policy 15.2.6.5	Oppose	As set out in other submission points, controls on wind generation are opposed due to the difficulties of evaluating such	Delete.

No.	Provision	Position	Submission	Relief Sought
	(Pedestrian focus)		<p>effects with certainty and the practical limitations on obtaining such assessments. Moreover, changes to wind generation and the pedestrian environment are a necessary tradeoff contemplated by the NPS-UD, insofar as it directs maximum intensification of central city environments.</p> <p>The proposed amendment is otherwise unnecessary and inappropriate, for the purposes of promoting intensification.</p> <p>Accordingly, the proposed addition to the policy should be deleted.</p>	
12.	Policy 15.2.7.1 (Diversity of activities)	Support	<p>The policy is an enabling policy encouraging a diversity of activities and the amendments are supported.</p>	Adopt.
13.	Policy 15.2.8.1 (Usability & adaptability)	Oppose	<p>The proposed addition of subclauses (a)(iv)-(vi) is opposed on the basis that such requirements do not reflect the operational and functional requirements of activities and buildings within the CCMUZ.</p> <p>If such requirements are intended to apply only to new residential developments, then the policy should be drafted to make this explicit (as is the case with policy 15.2.8.2 or clause vi. for example).</p>	<p>Delete subclauses (a)(iv)-(vi) of the policy as follows:</p> <p><i>a. Encourage a built form where the usability and adaptability of sites and buildings are enhanced by:</i></p> <p><i>iv. providing dedicated pedestrian access for each activity within a development, directly accessed from the street or other publicly accessible space;</i></p> <p><i>v. providing sufficient setbacks and glazing at the street frontage; and</i></p>

No.	Provision	Position	Submission	Relief Sought
				vi. where residential activity is located at the ground floor, ensuring the design of development contributes to the activation of the street and other public spaces.
14.	Policy 15.2.8.2 (Amenity & effects)	Support with amendment	<p>With the exception of subclauses (a)(iv) and (vi) and the addition of the word 'including' in the prefacing text, the policy is generally supported.</p> <p>Subclause (a)(v) is opposed on the basis that: 'locating outdoor service space and car parking away from street frontages and entrances to buildings' may not always be practicable or desirable and may establish a policy barrier to activities in such cases.</p> <p>Subclause (a)(viii) is opposed on the basis that urban design assessments impose unnecessary time, cost, and uncertainty for developments and built form standards provide a preferable method for managing development and providing certainty to all parties.</p> <p>The proposed amendments are otherwise unnecessary and inappropriate, for the purposes of promoting intensification.</p> <p>Accordingly, the proposed additions to the policy should be deleted.</p>	Delete subclauses (a)(v) and (viii) of the policy.
Chapter 15 – Commercial Local Centre Zone Provisions:				

No.	Provision	Position	Submission	Relief Sought
1.	Rule 15.5.1.1 P21 (LCZ- activity standards for residential activity)	Oppose	<p>The proposed amendments introduce additional design standards (re: outdoor living space, glazing and outlook space requirements).</p> <p>Such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	Retain the status quo in respect of Rule 15.5.1.1 P21.
2.	Rule 15.5.1.3 RD1 (LCZ- RDA consent requirements)	Oppose	<p>For the reasons set out above in respect of Rule P21, the amendments to rule RD1 (which specify a requirement for consent for a breach of the proposed additional rules in P21) are also opposed.</p> <p>As stated above, such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	Retain the status quo in respect of Rule 15.5.1.3 RD1.

No.	Provision	Position	Submission	Relief Sought
3.	Rule 15.5.2.2 (LCZ- Building height)	Support	The proposed amendments to this rule support the purpose of PC14 in respect of intensification and are supported.	Retain the amendments as proposed.
4.	Rule 15.5.2.5 (LCZ- Height in relation to boundary)	Support	The proposed amendments to this rule support the purpose of PC14 in respect of intensification and are supported.	Retain the amendments as proposed.
Chapter 15 – Commercial Central City Zone Provisions:				
1.	Rule 15.11.1.1 P13 (CCZ residential activity)	Oppose	Proposed changes to clauses (e) and (f) regarding minimum outdoor living space requirements and new clauses (h) and (i) regarding outlook space are opposed. Such rules amount to greater regulatory constraint on residential development and are therefore not enabling of intensification. Accordingly, such changes should be deleted.	Delete.
2.	Rule 15.11.1.2 C1 Controlled activities	Oppose in part	The submitter supports certification as a method and considers its application should not be limited to buildings 28m or less in height, or those compliant with rules 15.11.2.3 (sunlight and outlook for the street) or 15.11.2.12 (road wall height),	Amend Rule 15.11.1.2 C1 as follows: <i>a. Any new building, external alteration to any existing building, or the use of any part of a site not occupied by a building, for an activity listed in Rule 15.101.1.1 P1 to P17, which is:</i>

No.	Provision	Position	Submission	Relief Sought
			<p>given that such buildings will trigger restricted discretionary activity status in respect of those rules and provide Council with discretion to consider the corresponding assessment matters. To the extent that the urban design outcomes are otherwise achieved, this can still be assessed and certified by an independent urban design expert.</p>	<p>i. within the Central City Core area 28m or less in height; and</p> <p>ii. visible from a publicly owned and accessible space; and</p> <p>iii. meets the following built form standards:</p> <p>A. Rule 15.11.2.3 Sunlight and outlook for the street; and/or</p> <p>B. Rule 15.11.2.12 Maximum road wall height;</p> <p>iv. iii. is certified by a qualified expert on a Council approved list as meeting each of the urban design provisions/ outcomes...</p>
3.	<p>Rule 15.11.1.3 RD5</p> <p>(CCZ- RDA consent requirement)</p>	Oppose	<p>For the reasons set out below in respect of the corresponding built form standards that are proposed, the amendments to rule RD5 are also opposed, noting these specify a requirement for consent for a breach of the following new rules:</p> <ul style="list-style-type: none"> A. Maximum building height B. Upper floor setbacks C. Tower dimension, site coverage and separation D. Wind <p>As stated below, such changes are not necessary or appropriate for the purposes of promoting intensification and they impose</p>	<p>Retain the status quo in respect of Rule 15.11.1.3 RD5.</p>

No.	Provision	Position	Submission	Relief Sought
			<p>additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	
4.	<p>Rule 15.11.1.3 RD11</p> <p>(CCZ- RDA consent requirement)</p>	Oppose	<p>For the reasons set out below in further detail in respect of the building height built form standard (Rule 15.11.2.11 Building Height), this rule is opposed and should be deleted.</p>	Delete.
5.	<p>Rule 15.11.1.4 D1</p> <p>(CCZ- DA consent requirement)</p>	Oppose	<p>Retaining discretionary status for a breach of building height and road wall height is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.</p> <p>Building height and road wall height should be provided for as a permitted activity noting the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1).</p>	Delete Rule 15.11.1.4 D1 in its entirety.
6.	<p>Rule 15.11.2.3 Sunlight and</p>	Support	<p>The proposed amendments to this rule support the purpose of PC14 in respect of intensification and are supported.</p>	Adopt.

No.	Provision	Position	Submission	Relief Sought
	outlook for the street			
7.	Rule 15.11.2.9 Sunlight and outlook at the boundary with a residential zone	Support	The proposed amendments to this rule support the purpose of PC14 in respect of intensification and are supported.	Adopt.
8.	Rule 15.11.2.11 Building Height	Oppose	<p>The height limits in this rule are opposed in their entirety by the submitter.</p> <p>Among other reasons:</p> <ul style="list-style-type: none"> The rules are fundamentally inconsistent with the requirements in policy 3 of the NPS-UD to '<i>enable... building heights and density of built form to realise as much development capacity as possible, to maximise benefits of intensification</i>'. Policy 3 was drafted specifically for New Zealand's Tier 1 cities – all of which feature heritage sites and buildings – indicating such built form is envisaged alongside these features. 	Delete rule 15.11.2.11 in its entirety.

No.	Provision	Position	Submission	Relief Sought
			<ul style="list-style-type: none"> • The variable height limits for different parts of the city are arbitrary, inconsistent and inequitable. • To the extent that variable height limits are proposed in response to heritage values/features, this incorrectly assumes that building height and high density built form is inherently incompatible with heritage values. Such a conclusion is at odds with the evidence of successful intensive inner city development in international cities alongside heritage features of considerably greater significance. Vibrant central cities (as sought by objectives in chapters 3 and 15) inherently feature heritage items alongside substantial modern buildings, and to rely on heritage features as a basis for limiting built form and height is narrow-minded, conservative and myopic. • The heritage interfaces (and associated provisions) are generally opposed for the reasons stated in the covering submission. Among other things, it is noted that the heritage provisions in subchapter 9.3 provide for the management of buildings within heritage settings or alterations to heritage items. 	

No.	Provision	Position	Submission	Relief Sought
			<p>Accordingly, there is no need to separately constrain building height alongside or within heritage settings.</p> <ul style="list-style-type: none"> • The height limits fail to adequately account for planned development currently progressing in parts of the City Centre Zone where lower heights are proposed. This includes the Catholic Cathedral Precinct (which includes the sites with road boundaries on the north side of Armagh Street at 129, 131, 133, 137 and 143 Armagh Street) and the Cathedral Square Height Precinct, where significant development proposals currently being planned entail buildings of a greater height than the proposed rules permit. • The design of tall buildings is otherwise managed by way of the control/discretion afforded by the urban design rule (C1 and RD1). <p>Accounting for the points above and given that the proposed constraints on building heights are not necessary or appropriate for the purposes of promoting intensification, they should be deleted, such that no</p>	

No.	Provision	Position	Submission	Relief Sought
			maximum height limit applies throughout the City Centre Zone.	
9.	Rule 15.11.2.12 (CCZ – road wall height)	Oppose	Retaining a maximum road wall height rule is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted. Road wall heights should be unconstrained and provided for as a permitted activity noting the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1).	Delete Rule 15.11.2.12 in its entirety.
10.	Rule 15.11.2.14 (CCZ – building tower setbacks)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted. To the extent that such matters warrant consideration through a consenting framework, the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1) is considered sufficient to address this matter.	Delete Rule 15.11.2.14 in its entirety.
11.	Rule 15.11.2.15	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may	Delete Rule 15.11.2.15 in its entirety.

No.	Provision	Position	Submission	Relief Sought
	(CCZ – max tower dimension and upper floor site coverage)		<p>not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.</p> <p>To the extent that such matters warrant consideration through a consenting framework, the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1) is considered sufficient to address this matter.</p>	
12.	<p>Rule 15.11.2.16</p> <p>(CCZ – building tower separation)</p>	Oppose	<p>Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.</p> <p>To the extent that such matters warrant consideration through a consenting framework, the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1) is considered sufficient to address this matter.</p>	Delete Rule 15.11.2.16 in its entirety.
13.	Rule 15.11.2.17	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may	Delete Rule 15.11.2.17 in its entirety.

No.	Provision	Position	Submission	Relief Sought
	(CCZ – Wind)		<p>not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.</p> <p>As set out in other submission points, controls on wind generation are opposed due to the difficulties of evaluating such effects with certainty and the practical limitations on obtaining such assessments. Moreover, changes to wind generation and the pedestrian environment are a necessary tradeoff contemplated by the NPS-UD, insofar as it directs maximum intensification of central city environments.</p> <p>The proposed rule is otherwise unnecessary and inappropriate for the purposes of promoting intensification and should be deleted.</p>	
Chapter 15 – Commercial Central City Mixed Use Zone Provisions:				
1.	<p>Rule 15.12.1.1 P16</p> <p>(CCMUZ residential activity)</p>	Oppose	<p>The proposed amendments introduce additional design standards (re: street setback, glazing and outlook space requirements).</p> <p>Such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional</p>	Retain the status quo in respect of Rule 15.12.1.1 P16.

No.	Provision	Position	Submission	Relief Sought
			consenting requirements with associated implications in terms of time, cost, and uncertainty. Accordingly, these amendments should be deleted.	
2.	Rule 15.12.1.2 C1 (CCMUZ - Catholic Cathedral)	Support, with amendment	The proposed rule is supported and appropriately implements policy 15.2.5.1. However, as noted in the submission above on policy 15.2.5.1, the provisions in PC14 should be amended to recognise the establishment of a new cathedral for the Catholic Diocese of Christchurch within the city block bounded by Colombo Street, Armagh Street, Manchester Street and Oxford Terrace. Given that the purpose of PC14 is to support intensification, amendments to the rule to support the establishment of the new cathedral (and its design, form and function requirements) on its chosen central city site is appropriate.	Amend Rule 15.12.1.2 C1 as follows: <i>a. Any building on the site at 136 Barbadoes Street within the city block bounded by Colombo Street, Armagh Street, Manchester Street and Oxford Terrace</i> <i>b...</i>
3.	Rule 15.12.1.3 RD2	Oppose	The changes proposed to this rule are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.	Retain the status quo in respect of Rule 15.12.1.3 RD5.

No.	Provision	Position	Submission	Relief Sought
	(CCMUZ-RDA consent requirement)		Accordingly, these amendments should be deleted.	
4.	Rule 15.12.1.3 RD4 (CCMUZ-RDA consent requirement)	Oppose	This new rule and its requirement for consent for residential developments within the CCMUZ is not necessary or appropriate for the purposes of promoting intensification and will impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty. Accordingly, these amendments should be deleted.	Delete.
5.	Rule 15.12.1.3 RD5 (CCMUZ-RDA consent requirement)	Oppose	This new rule and its requirement for consent for buildings exceeding 17m height within the CCMUZ is not necessary or appropriate for the purposes of promoting intensification and will impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty. Accordingly, these amendments should be deleted.	Delete.
6.	Rule 15.12.1.3 RD6	Oppose	This new rule and its requirement for consent is not necessary or appropriate for the purposes of promoting intensification and will impose additional consenting	Delete.

No.	Provision	Position	Submission	Relief Sought
	(CCMUZ-RDA consent requirement)		requirements with associated implications in terms of time, cost, and uncertainty. Accordingly, these amendments should be deleted.	
7.	Advice note (at the end of 15.12.1.3)	Oppose	The advice note concerns residential heritage areas. For reasons stated in submissions specifically on residential heritage areas, this advice note is opposed.	Delete.
8.	Rule 15.12.2.1 (CCMUZ – Landscaping & trees)	Oppose in part	Proposed clause (a)(iv) increases landscaping requirements from 5% of the site area to 10%. This change is not necessary or appropriate for the purposes of promoting intensification and will in fact be counter to intensification by diminishing the area of the site available for built form/development. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty. Accordingly, this amendment should be deleted.	Retain the status quo in clause (a)(iv) – i.e. 5% rather than 10% site landscaping.
9.	Rule 15.12.2.2	Oppose	The variable building heights and maximum building base heights are inadequate and inappropriate for a commercial zone within the central city, accounting for Policy 3(a) and Policy 3 (c) of the NPS-UD directs that	Amend as follows: 15.12.2.2 Maximum building height

No.	Provision	Position	Submission	Relief Sought
	(CCMUZ – building height)		<p>development of up to six stories is to be 'enabled' as a minimum.</p> <p>Accounting for this, the submitter seeks that the rule provide for a permitted maximum building height of at least 32m.</p>	<p><i><u>a. The maximum height of any building shall be 32 metres.</u></i></p> <p><i>b. The maximum height of any building shall be in accordance with the height specified Unless identified on the Central City Maximum Building Height planning map the maximum height of any building shall be 32 metres.</i></p> <p><i>b. The maximum height of any building base shall be 17 metres.</i></p> <p><i>e. b. Any application arising from this rule shall not be limited or publicly notified</i></p>
10.	<p>Rule 15.12.2.9</p> <p>(CCMUZ – Minimum number of floors)</p>	Oppose	<p>A prescriptive requirement for a minimum number of floors is opposed on the basis that this is not 'enabling' of development or responsive to the functional or operational needs of activities and commercial/market imperatives determining their optimal location.</p> <p>Accordingly, the proposed new rule requirement for a minimum of 3 floors is opposed.</p> <p>This change is not necessary or appropriate for the purposes of enabling intensification and will also impose additional consenting</p>	Delete Rule 15.12.2.9 in its entirety.

No.	Provision	Position	Submission	Relief Sought
			requirements with associated implications in terms of time, cost, and uncertainty. Accordingly, this amendment should be deleted.	
11.	Rule 15.12.2.10 (CCMUZ – building setbacks)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	Delete Rule 15.12.2.10 in its entirety.
12.	Rule 15.12.2.11 (CCMUZ – building tower coverage)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	Delete Rule 15.12.2.11 in its entirety.
13.	Rule 15.12.2.12 (CCMUZ – glazing)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of	Delete Rule 15.12.2.12 in its entirety.

No.	Provision	Position	Submission	Relief Sought
			PC14 and accordingly this rule should be deleted.	
Chapter 15 – Commercial Central City (South Frame) Mixed Use Zone Provisions:				
1.	Rule 15.13.1.1 P3 (CC(SF)MUZ commercial services & offices)	Support in part	<p>Given the central location of that part of this zone which is outside the Health and Innovation Precincts and that intensification of such land is likely to be realised by way of office development, the limitations in clause (a)(ii) of this rule limiting the total quantum of office activity are considered inappropriate and counter to the purpose of PC14.</p> <p>Retention of clause (a)(i) of the rule would ensure that any demand for large floor plate offices or larger office tenants is satisfied within the CCB zone.</p> <p>Enabling smaller office tenancies to establish within the CC(SF)MUZ would support, and not otherwise compromise, the intended role of the CCB zone.</p> <p>Noting the above, clause (a)(ii) of this rule should be deleted.</p>	<p>Delete activity standard (a) from Rule 15.13.1.1 P3, as follows:</p> <p><i>a. Outside the Health Precinct and/or the Innovation Precinct:</i></p> <p><i>i. Where office activities or commercial services are proposed on a site, individual tenancies shall not exceed 450m² of GLFA; and</i></p> <p><i>ii. The total area used for office activities and/or commercial services shall not exceed 450m² of GLFA per site, or 450m² of GLFA per 500m² of land area; whichever is greater. This limit may be exceeded where office activities and/or commercial services form part of a mixed-use development comprising residential activities, in which case the office activities and commercial services collectively shall not exceed 50% of the GLFA of the overall development.</i></p>
2.	Rule 15.13.1.1 P13	Oppose	The proposed amendments now require 20m ² (rather than 10m ²) of outdoor living space for residential units with a ground floor habitable space and otherwise	Retain the status quo in respect of Rule 15.13.1.1 P13.

No.	Provision	Position	Submission	Relief Sought
	(CC(SF)MUZ residential activity)		<p>introduce additional design standards (re: glazing and outlook space requirements).</p> <p>Such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	
3.	<p>Rule 15.13.1.3 RD5</p> <p>(CCMUZ-RDA consent requirement)</p>	Oppose	<p>For the reasons set out below in respect of the corresponding built form standards that are proposed, the amendments to rule RD2 are also opposed, noting these specify a requirement for consent for a breach of the following new rules:</p> <ul style="list-style-type: none"> A. Maximum building height B. Minimum number of floors C. Upper floor setbacks, tower dimension and site coverage D. Glazing <p>As stated below, such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with</p>	Delete proposed new clauses (j)-(m) in Rule 15.13.1.3 RD5.

No.	Provision	Position	Submission	Relief Sought
			<p>associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	
4.	<p>Rule 15.13.2.1</p> <p>(CC(SF)MUZ – height)</p>	Oppose	<p>The variable building heights and maximum building base heights are inadequate and inappropriate for a commercial zone within the central city, accounting for Policy 3(a) and Policy 3 (c) of the NPS-UD directs that development of up to six stories is to be 'enabled' as a minimum.</p> <p>Accounting for this, the submitter seeks that the rule provide for a permitted maximum building height of at least 32m.</p>	<p>Delete rule 15.13.2.1 as proposed and replace with the following:</p> <p><i>15.13.2.1 Building height</i></p> <p><i><u>a. The maximum height of any building shall be 32 metres.</u></i></p> <p><i><u>b. Any application arising from this rule shall not be limited or publicly notified.</u></i></p>
5.	<p>Rule 15.13.2.8</p> <p>(CC(SF)MUZ – minimum number of floors)</p>	Oppose	<p>The requirement for a minimum of 3, rather than 2 floors does not reflect the functional or operational requirements of many permitted activities that are expected to establish with the zone.</p> <p>This change is not otherwise necessary or appropriate for the purposes of promoting intensification and will in fact be counter to intensification by limiting more efficient forms of development based on a 3m ground floor height. The rule change will also impose additional consenting</p>	Retain the status quo in respect of Rule 15.13.2.10.

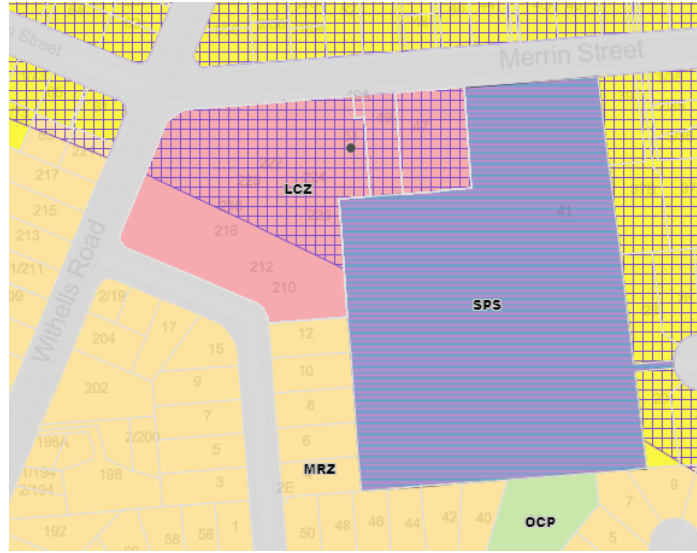
No.	Provision	Position	Submission	Relief Sought
			requirements with associated implications in terms of time, cost, and uncertainty. Accordingly, this amendment should be deleted.	
6.	Rule 15.13.2.10 (CC(SF)MUZ – building tower setbacks)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	Delete Rule 15.12.2.10 in its entirety.
7.	Rule 15.13.2.11 (CC(SF)MUZ – building tower site coverage)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	Delete Rule 15.12.2.11 in its entirety.
8.	Rule 15.13.2.12 (CC(SF)MUZ – glazing)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of	Delete Rule 15.12.2.12 in its entirety.

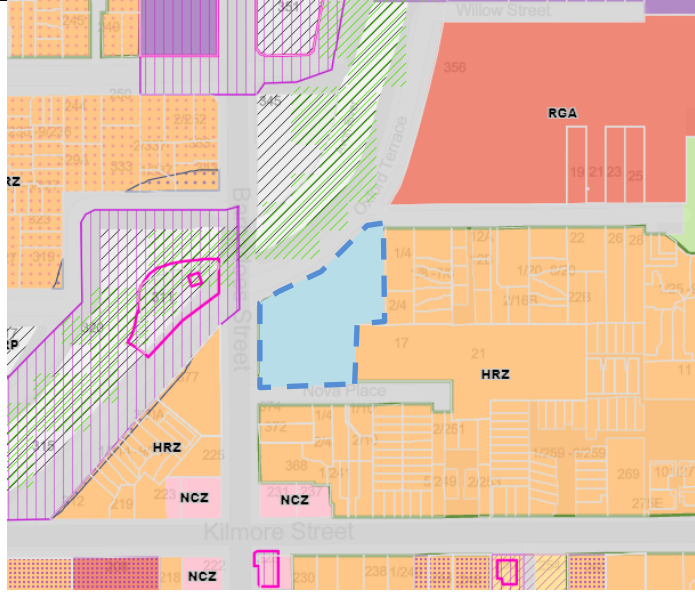
No.	Provision	Position	Submission	Relief Sought
			PC14 and accordingly this rule should be deleted.	
Chapter 15 – Commercial Zones- Matters of Discretion				
1.	Rule 15.14.3.1 (Matters of discretion- building height)	Oppose	<p>The proposed new matters of discretion in clause (b) for applications exceeding the permitted maximum building height are:</p> <ul style="list-style-type: none"> a. Unnecessary, insofar that they introduce matters that are otherwise within the scope of the operative matters . b. Unclear and uncertain. c. Excessively broad in scope. <p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or appropriate for the purposes of promoting intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Retain the status quo in respect of Rule 15.14.3.1 (and delete the proposed assessment matters in clause (b) in their entirety).
2.	Rule 15.14.3.35	Oppose	The proposed new matters of discretion relate to rules that are otherwise opposed, and as such these should be deleted.	Delete Rule 15.14.3.35 in its entirety.

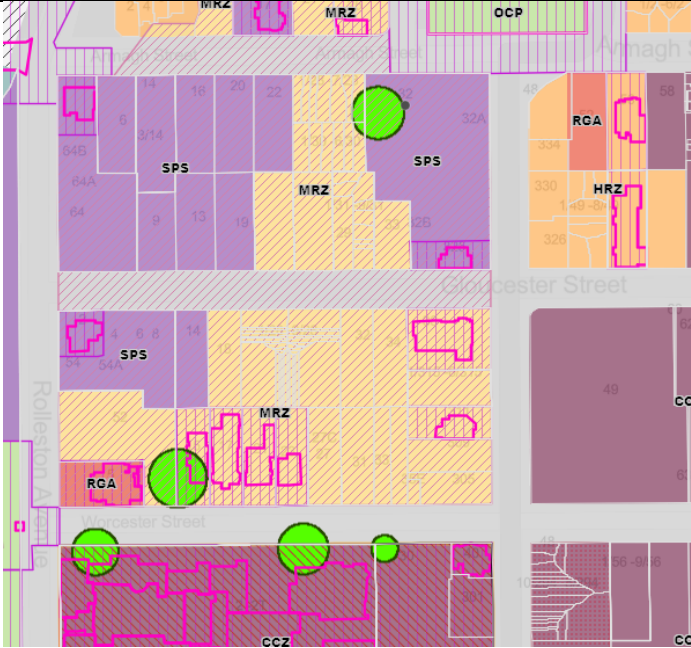
No.	Provision	Position	Submission	Relief Sought
	(Matters of discretion-upper floor setbacks, tower dimension and coverage)		<p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or appropriate for the purposes of promoting intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	
3.	<p>Rule 15.14.3.36</p> <p>(Matters of discretion-Tower Roof Modulation)</p>	Oppose	<p>The proposed new matters of discretion in this rule are unnecessary, insofar that they introduce matters that are otherwise within the scope of the operative matters in Rule 15.14.3.1 clause (a).</p> <p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or appropriate for the purposes of promoting intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Delete Rule 15.14.3.36 in its entirety.

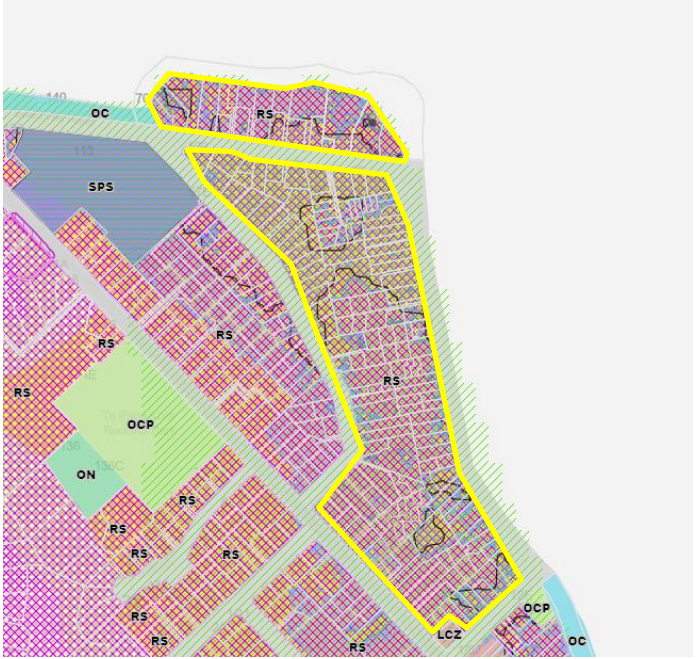
No.	Provision	Position	Submission	Relief Sought
4.	Rule 15.14.3.37 (Matters of discretion- Glazing	Oppose	<p>The proposed new matters of discretion relate to rules that are otherwise opposed, and as such these should be deleted.</p> <p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or appropriate for the purposes of promoting intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Delete Rule 15.14.3.37 in its entirety.
5.	Rule 15.14.3.38 (Matters of discretion- outlook space)	Oppose	<p>These changes are not necessary or appropriate for the purposes of promoting intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Delete Rule 15.14.3.38 in its entirety.
6.	Rule 15.14.3.39 (Matters of discretion- Wind	Oppose	<p>The proposed new matters of discretion relate to rules that are otherwise opposed, and as such these should be deleted.</p> <p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or</p>	Delete Rule 15.14.3.39 in its entirety.

No.	Provision	Position	Submission	Relief Sought
			<p>appropriate for the purposes of promoting intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	
7.	<p>Rule 15.14.5.2</p> <p>(Matters of discretion- Buildings at 136 Barbadoes Street)</p>	Support in part	<p>Consistent with the submission on the corresponding policy (15.2.5.1, which specifically refers to 'Cathedrals in Central City') and rule 15.12.1.2 C1, this provision should be amended to recognise and provide for the establishment of a new cathedral for the Catholic Diocese of Christchurch within the city block bounded by Colombo / Armagh / Manchester Streets and Oxford Terrace.</p> <p>Given that the purpose of PC14 is to support intensification, amendments to the rule to support the establishment of the new cathedral (and its design, form and function requirements) on its central city site is appropriate.</p>	<p>Amend Rule 15.14.5.2 as follows:</p> <p><u>15.14.5.2 The Building of a new Catholic Cathedral Buildings at 136 Barbadoes Street</u></p> <p><i>a. The extent to which the building <u>of a new Catholic Cathedral within the city block bounded by Colombo / Armagh / Manchester Streets and Oxford Terrace...</u></i></p>

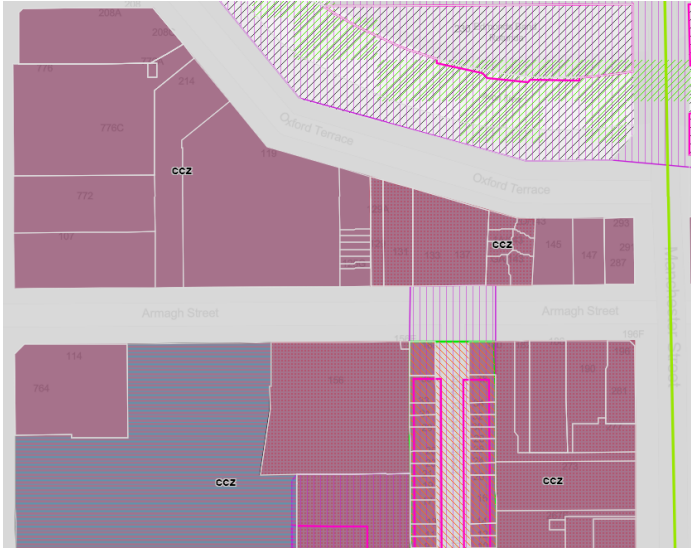
No.	Provision	Position	Submission	Relief Sought
Planning Maps / Rezoning				
1.	Planning maps	Support	For the reasons expressed in the submission above, the submitter supports the LCZ zoning of the properties on the corner of Merrin Street and Withells Road (Avonhead shopping centre). For the avoidance of doubt, the submitter seeks that policy 15.2.2.1 be amended to recognise this as a 'large' LCZ.	<p>Retain the LCZ shown for the Avonhead Shopping Centre on the Withells/Merrin corner as indicated below.</p> 
2.	Planning maps	Oppose in part	For the reasons expressed in the submission above, the submitter considers the property at 332 Oxford Terrace should be rezoned CCMUZ, accounting for the attributes of the land/locality, its historical use, and in order to meet the requirements of the NPS-UD.	Amend the planning maps to rezone the properties at 332 Oxford Terrace as Commercial Central City Mixed Use, as indicated below (in blue outline).

No.	Provision	Position	Submission	Relief Sought
				
3.	Planning maps	Oppose in part	<p>For the reasons expressed in the submission above, the submitter supports the zoning of the land at 32 Armagh Street, but opposes the overlays applying to the land (as indicated in the figure included with this submission point).</p> <p>Specifically, the submitter:</p> <ul style="list-style-type: none"> a. Opposes the heritage setting and heritage item identified on the planning maps; 	<p>Amend the planning maps to remove the following features identified on the planning maps at 32 Armagh Street (as indicated below):</p> <ul style="list-style-type: none"> a. The heritage setting and heritage item; b. 2x scheduled trees (including the qualifying matter tree); c. The residential heritage area overlay applying to the land and surrounding area.

No.	Provision	Position	Submission	Relief Sought
			<p>b. Opposes the 2x scheduled trees (including the qualifying matter tree) identified on the planning maps;</p> <p>c. Opposes the residential heritage area overlay applying to the land and surrounding area.</p>	
4.	Planning maps	Oppose in part	<p>For the reasons expressed in the submission above, the submitter opposes the zoning and overlays applying to the land either side of Beachville Road in Redcliffs (as indicated in the figure included with this submission point).</p> <p>Specifically, the submitter:</p> <p>d. Opposes Residential Suburban zoning, on the basis that the land provides an attractive and</p>	<p>Amend the planning maps in respect of the land identified below to:</p> <ol style="list-style-type: none"> 1. Rezone the land as MRZ. 2. Remove the following overlays: <ol style="list-style-type: none"> a. Low Public Transport Accessibility, b. Coastal Hazard Medium and High Risk Management Area, c. High Floodplain Hazard Management Area,

No.	Provision	Position	Submission	Relief Sought
			<p>appropriate location for medium density development. The attributes of the land are comparable to the MRZ adjacent to The Esplanade in Sumner. Accordingly, the submitter seeks that the land be rezoned MRZ.</p> <p>e. Opposes the Low Public Transport Accessibility overlay, noting this area has convenient access to public transport connections on Main Road. The submitter generally opposes this overlay, noting that any current deficiencies in accessibility to public transport can be remedied over time to meet demands (e.g. through additional public investment, technological solutions, ride sharing such as Uber Pool, etc) and should not be relied on as a basis to disenable development or intensification.</p> <p>f. Opposes the Coastal Hazard Medium and High Risk Management Area, High Floodplain Hazard Management Area and Tsunami Management Area Overlays and Qualifying Matters, generally, and specifically for the land identified. The submitter considers that these overlays and QMs are overly and unreasonably</p>	<p>d. Tsunami Management Area, and</p> <p>e. Sites of Cultural Significance.</p> 

No.	Provision	Position	Submission	Relief Sought
			<p>conservative and they inappropriately preclude or constrain development capacity and intensification that can incorporate measures to avoid or manage natural hazards (minimum floor levels, building resilience measures, etc).</p> <p>g. Opposes the Sites of Cultural Significance overlay to the extent this is relied on as a Qualifying Matter, generally and specifically in relation to the land identified in this submission. Whilst the submitter acknowledges the need to protect or appropriately manage areas or sites of cultural significance, they do not consider this should not preclude or constrain intensification that can incorporate appropriate measures to avoid effects on these sites.</p>	
5.	Planning maps	Oppose in part	<p>For the reasons expressed in the submission above, the submitter supports the zoning of the land bounded by Oxford Terrace, Manchester Street, Armagh Street, and Colombo Street, but opposes a number of overlays applying to the land or adjacent land.</p> <p>Specifically, the submitter:</p>	<p>Amend the planning maps applying to the land bounded by Oxford Terrace, Manchester Street, Armagh Street, and Colombo Street, as follows::</p> <p>a. Delete the extent of the heritage setting for New Regent Street (being heritage setting 336 associated with heritage item 404 in Appendix 9.3.7.2 schedule), so that it ends at the southern most edge of Armagh Street,</p>

No.	Provision	Position	Submission	Relief Sought
			<p>a. Opposes the extent of the heritage setting for New Regent Street (being heritage setting 336 associated with heritage item 404 in Appendix 9.3.7.2 schedule) and considers the setting should end at the southern most edge of Armagh Street, being where New Regent Street meets Armagh Street.</p> <p>b. Opposes the Central City Heritage Interface overlay, where this applies to the site.</p>	<p>being where New Regent Street meets Armagh Street.</p> <p>b. Delete the Central City Heritage Interface overlay.</p> 

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 11/05/2023

First name: Julia

Last name: Mallett

Organisation:

The Board of Trustees of the Te Ara Koropiko West Spreydon School

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

Request that proximity to a Primary School is introduced as a Qualifying Matter.

My submission is that:

The Board of Trustees of the Te Ara Koropiko West Spreydon School wish to submit in opposition of the introduction of the MDRZ (Medium Density Residential Zone) without due consideration for the impact on Primary Schools in suburban Christchurch.

The Ministry of Education, together with other government stakeholders, funded a rebuild of Te Ara Koropiko West Spreydon School less than 5 years ago. This modern, purpose-built campus is beloved by the community and has been designed to provide a state-of-the-art place of learning for up to 358 students. We are currently looking to have just 270 enrolled by June.

The below roll data is based on the 1st of July (July Roll Return Date)

2023 - 263 (as of 10.05.23)

2022 - 263

2021 - 288

2020 - 289

2019 - 292

2018 - 324

We have seen a steady reduction of our school roll in the last 3 years, with anecdotal evidence from leavers stating that to be able to secure the 3- and 4-bedroom homes they wish to raise their families in, they must leave the area.

- We understand that people wishing to buy a home near the school are facing significant barriers, as the buying power of developers has pushed prices up.
- This article (<https://www.stuff.co.nz/life-style/homed/renting/131298574/is-christchurchs-rental-market-under-pressure-from-aucklanders>) well describes the shortage of 3- and 4- bedroom homes available to rent juxtaposed with the oversupply of townhouses.

The broad implementation of a MDRZ across Christchurch suburbs will exacerbate this issue exponentially and have a dramatic impact on our – and other - school rolls, ultimately leading to the loss of Kaiako FTEs and other funding.

Te Ara Koropiko West Spreydon School is at the centre of our community and should be valued as such. If we do not safeguard the

future of our school, the Board is concerned that not only will this be detrimental to our school, but will also lead to the community losing its special character. **As a Board we are particularly concerned** about the impact this will have on whānau Māori and tamariki Māori, and importance of preserving and enhancing whanaungatanga, and ensuring equitable access to high quality housing and education.

We strongly believe that access to high quality education is the right of every child in New Zealand - no-one has the right to take that away. However, with the way school funding works, we are at risk of losing both management units and staff due to our roll decreasing. This does not happen nicely where it is simply a matter of one less class, but rather creates staffing difficulties that prevent students being able to access good quality teaching at all times. At Te Ara Koropiko West Spreydon School, we have worked hard to create a culture of community engagement and connection and we are committed to seeing this continue and grow. We do not believe that more 1- and 2- bedroom apartments will be beneficial to building a strong and resilient community as anecdotally, it seems it is driving our precious families out of our suburb.

Based on the above article, this appears to be a wider issue, and our suggestion is that all suburban primary schools are protected from the impacts of increased densification.

Robson, Gina

From: Julia Mallett <julia.mallett@westspreydon.school.nz>
Sent: Friday, 12 May 2023 3:46 pm
To: Engagement
Subject: Feedback on Our proposed Housing and Business Choice Plan Change (PC14) / 531

Good afternoon,

I am writing with regard to a submission made by myself on behalf of the Board of Trustees of The Ara Koropiko West Spreydon School (submitted yesterday).

In our submission I selected that we did NOT want to speak to our submission in a hearing.

I selected this option, as the way the two options were presented indicated an either/or, and I was worried that if a representative of our Board was unable to attend a hearing that our submission would not be included in the general written submissions class.

I am writing to notify that in addition to our written submission, we would like to speak in a hearing about our submission should this be possible.

Regards

Julia Mallett

On behalf of the Board of Trustees, The Ara Koropiko West Spreydon School

julia.mallett@westspreydon.school.nz

0211730778

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Linda

Last name: Morris

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

My submission is that:

I support the Character Area Status for Beckenham and I support the Character Area rules which protect the street scene.

I support the Sunlight Qualifying Matters rule. It's helpful but still not enough.

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date: 12/05/2023

First name: Wigram Lodge (2001) Limited **Last name:** Elizabeth and John Harris

Preferred method of contact Email

Attached Documents

Name
Plan Change 14 Submission-850-862 Colombo Street and 139 Salisbury St-FINAL

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date: 12/05/2023

First name: Wigram Lodge (2001) Limited **Last name:** Elizabeth and John Harris

Preferred method of contact Email

Attached Documents

Name
Plan Change 14 Submission-152-158 Peterborough and 327-333 Manchester-FINAL

Form 5
Submission on notified proposal for a Plan Change
 Clause 6 of Schedule 1, Resource Management Act 1991

To: **Christchurch District Council**

Name of Submitter: **Wigram Lodge (2001) Limited, Elizabeth Harris
and John Harris**

Background

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

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

Introduction

5. This is a submission on PC14 made by Wigram Lodge (2001) Limited and Elizabeth & John Harris (**the submitter**). The submitter has interests in the properties 850-862 Colombo Street and 139 Salisbury Street, Christchurch Central, Christchurch (**the Site**).
6. The property is depicted in **Figure 1** and legal descriptions are included in **Attachment [A]**.

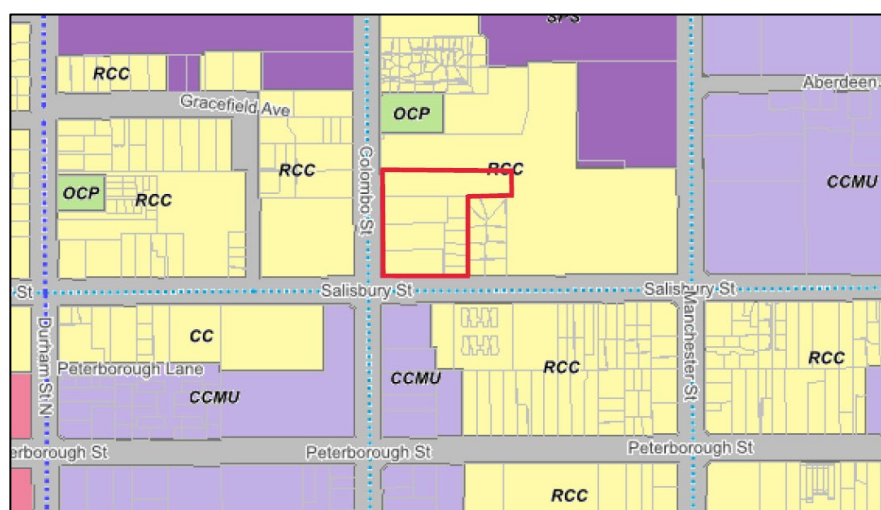


Figure 1 Location of the properties within red boundaries, with operative District Plan zoning illustrated (CCC District Plan).

7. The properties are located on Colombo Street and Salisbury Street which are both Central City Local Distributor roads. The properties have legal access from these legal roads.
8. The property is located within the Residential Central City Zone under the operative District Plan. The site is proposed to be zoned High Density Residential Zone under PC14.

Specific provisions of the plan change that this submission relates to

9. The submitter has an interest in the plan change as a whole and therefore this submission relates to all provisions and zonings of the plan change. The submitter has a specific interest in all provisions and zoning that relate to the properties referred to above.

Submission

10. The submitter both **supports** and **opposes** the plan change as notified. More specifically:
 - (a) the submitter supports the intensification of urban form to provide for additional development capacity, particularly near the city and commercial centres, and supports any provisions or changes to the District Plan that will achieve this outcome; and
 - (b) the submitter opposes any provisions or changes that will adversely affect the outcome in (a); while
 - (c) requesting that the submitter's property is rezoned to an alternative zone that provides for both residential and commercial activity, better reflecting the site context in the Central City and better giving effect to the NPS-UD.
11. The submitter has intentions to undertake a comprehensive redevelopment of the entire site, which could comprise a mix of commercial and residential activities.
12. The site is located on a prominent Central City corner site with frontage to two Central City Local Distributor roads. Both southern corner sites at this intersection are zoned Central City Mixed Use (**CCMU**), and new developments have been undertaken on these sites, residential units on the south-western corner and a hotel and restaurant on the south-eastern corner. The north-western corner site is a large-scale community facility and on the north-eastern corner is the submitter's site with an existing medium density residential development. The character of the area is transitory between more commercial land uses to the south and residential areas to the north of Salisbury Street.
13. Policy 3 of the NPS-UD is of direct relevance, whereby at sub clause (a) it directs that the district plan is to enable building heights and density of urban form to realise as much *development capacity* as possible, to maximise benefits of intensification in city centre zones.
14. "Development Capacity" is a defined term in the NPS-UD and means the capacity of land to be developed for housing or for business use, based on:
 - (a) the zoning, objectives, policies, rules, and overlays that apply in the relevant proposed and operative RMA planning documents; and
 - (b) the provision of adequate development infrastructure to support the development of land for housing or business use.
15. An appropriate outcome for the submitter's property would be to provide for housing and business uses and enabling greater building heights and densities.
16. Rezoning the site to provide for mixed use development along with commensurate changes to the District Plan to provide for this submission and give effect to the NPS-UD will:

- (a) provide for a mixed-use development on the site, including commercial activity in an appropriate location, being a prominent intersection adjacent to existing CCMU zoned land;
- (b) provide greater scope for a development on the site to suitably emphasize the street corner;
- (c) maintains support for the primacy of commercial centres, supporting the economic growth of the District, and therefore the economic well-being of communities;
- (d) not have any discernible effects on the amenity of adjoining residential zones, or undermine the residential coherence of residential neighbourhoods;
- (e) maintain a sufficient supply of housing in the district;
- (f) contribute to the social and economic well-being of communities and meet the reasonably foreseeable needs of future generations;
- (g) represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means;
- (h) give effect to the NPS-UD (notably Policy 3) and Canterbury Regional Policy Statement; and
- (i) promote the sustainable management of natural and physical resources, will be consistent with Part 2 of the Resource Management Act 1991 and ultimately achieve its purpose.


Relief sought

17. The submitter seeks the following relief:
- (a) the submitters site be rezoned to enable mixed use development, such as the Central City Mixed Use (**CCMU**) Zone;
 - (b) any other additional or consequential relief to the District Plan, including but not limited to, the maps, issues, objectives, policies, rules, controls/discretions, assessment criteria and explanations that will give effect to the matters raised in this submission and the relevant planning legislation.

Other

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

DATED 12 May 2023



pp. _____

Wigram Lodge (2001) Limited, Elizabeth Harris and John Harris

Address for Service:

Town Planning Group
PO Box 35
Christchurch 8014

Contact Person:

Anita Collie

Cell:

021 568 335

E-mail:

anita@townplanning.co.nz

Attachment [A]

Legal Descriptions of the Submitters' property relevant to this submission

Address	Legal Description	Record of Title
850 Colombo Street	Part Lot 3-4 Deposited Plan 1147	CB22K/686
854 Colombo Street	Part Lot 3-4 Deposited Plan 1147	CB20F/316
856 Colombo Street	Part Lot 2 Deposited Plan 1147	CB6B/511
858 Colombo Street	Part Lot 2 Deposited Plan 1147	CB5B/1365
860-862 Colombo Street	Part Lot 1 Deposited Plan 1147	CB533/245
139 Salisbury Street		CB24K/140
	Unit A Deposited Plan 47335	CB26K/511
	Unit B and Accessory Unit B1 Deposited Plan 47335	CB26K/512
	Unit C and Accessory Unit C1 Deposited Plan 47335	CB26K/513
	Unit D and Accessory Unit D1 Deposited Plan 47335	CB26K/514
	Unit E and Accessory Unit E1 Deposited Plan 47335	CB26K/515

Form 5
Submission on notified proposal for a Plan Change
 Clause 6 of Schedule 1, Resource Management Act 1991

To: **Christchurch District Council**

Name of Submitter: **Wigram Lodge (2001) Limited, Elizabeth Harris
and John Harris**

Background

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

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

Introduction

5. This is a submission on PC14 made by Wigram Lodge (2001) Limited and Elizabeth & John Harris (**the submitter**). The submitter has interests in the properties 152-158 Peterborough Street and 327-333 Manchester Street, Christchurch Central, Christchurch (**the Site**). Legal descriptions and Record of Titles are included in **Attachment [A]**.
6. The property is depicted in **Figure 1** below.

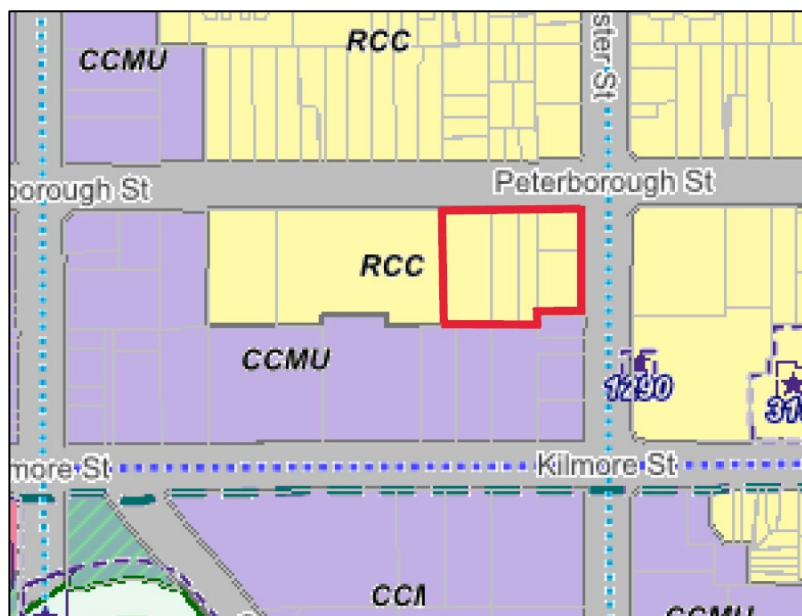


Figure 1 Location of the properties within red boundaries, with zoning illustrated (CCC District Plan).

7. The properties are located on Peterborough Street which is a local road and Manchester Street which is a Central City local distributor. The properties have legal access from these roads.
8. The property is located within the Residential Central City Zone under the operative District Plan. The site is proposed to be zoned High Density Residential Zone under PC14.

Specific provisions of the plan change that this submission relates to

9. The submitter has an interest in the plan change as a whole and therefore this submission relates to all provisions and zonings of the plan change. The submitter has a specific interest in all provisions and zoning that relate to the properties referred to above.

Submission

10. The submitter both **supports** and **opposes** the plan change as notified. More specifically:
 - (a) the submitter supports the intensification of urban form to provide for additional development capacity, particularly near the city and commercial centres, and supports any provisions or changes to the District Plan that will achieve this outcome; and
 - (b) the submitter opposes any provisions or changes that will adversely affect the outcome in (a);
 - (c) the submitter requests that the site is rezoned to an alternative zone that provides for both residential and commercial activity, better reflecting the site context in the Central City and better giving effect to the NPS-UD.
11. The submitter has intentions to undertake a comprehensive redevelopment of the entire site, which could comprise a mix of commercial and residential activities.
12. The site is located on a prominent Central City corner site with frontage to a Central City local distributor road. The character of the area is transitory between more commercial land uses to the south and residential areas to the north of Peterborough Street. Sites to the immediate south of the site are zoned Commercial Central City Mixed Use. The property adjoining the site to the west is a relatively newly developed car parking facility for Forte Health and unlikely to be redeveloped for residential use in the near future.
13. Policy 3 of the NPS-UD is of direct relevance, whereby at sub clause (a) it directs that the district plan is to enable building heights and density of urban form to realise as much *development capacity* as possible, to maximise benefits of intensification in city centre zones.
14. "Development Capacity" is a defined term in the NPS-UD and means the capacity of land to be developed for housing or for business use, based on:
 - (a) the zoning, objectives, policies, rules, and overlays that apply in the relevant proposed and operative RMA planning documents; and
 - (b) the provision of adequate development infrastructure to support the development of land for housing or business use.
15. An appropriate outcome for the submitter's site and the surrounding properties would be to provide for housing and business uses and enabling greater building heights and densities.
16. Rezoning the site to provide for mixed use development along with commensurate changes to the District Plan to provide for this submission and give effect to the NPS-UD will:
 - (a) provide for a mixed-use development on the site, including commercial activity in an appropriate location, being a corner site adjacent to existing CCMU zoned land;

- (b) provide greater scope for a development on the site to suitably emphasize the street corner;
- (c) maintains support for the primacy of commercial centres, supporting the economic growth of the District, and therefore the economic well-being of communities;
- (d) not have any discernible effects on the amenity of adjoining residential zones, or undermine the residential coherence of residential neighbourhoods;
- (e) maintain a sufficient supply of housing in the district;
- (f) contribute to the social and economic well-being of communities and meet the reasonably foreseeable needs of future generations;
- (g) represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means;
- (h) give effect to the NPS-UD (notably Policy 3) and Canterbury Regional Policy Statement; and
- (i) promote the sustainable management of natural and physical resources, will be consistent with Part 2 of the Resource Management Act 1991 and ultimately achieve its purpose.


Relief sought

17. The submitter seeks the following relief:
 - (a) the submitters site be rezoned to enable mixed use residential and commercial development, such as the Central City Mixed Use (CCMU) Zone; or
 - (b) site specific refinements made to the proposed HDRZ to enable the outcomes sought in this submission;
 - (c) provisions included to enable the range of matters outlined in paragraph 4 above that together assist with ensuring PC14 gives effects to the NPS-UD;
 - (d) any other additional or consequential relief to the District Plan, including but not limited to, the maps, issues, objectives, policies, rules, controls/discretions, assessment criteria and explanations that will give effect to the matters raised in this submission and the relevant planning legislation.

Other

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

DATED 12 May 2023

pp.  _____

Wigram Lodge (2001) Limited, Elizabeth Harris and John Harris

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

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

Attachment [A]

Legal Descriptions of the Submitters' property relevant to this submission

Address	Legal Description	Record of Title
152 Peterborough Street	Lot 1 Deposited Plan 4112	CB21K/1309
156 Peterborough Street	Lot 1 and Part Lot 2 Deposited Plan 3393	CB329/270
158 Peterborough Street	Part Lot 2 Deposited Plan 3393	CB326/110
327 Manchester Street	Lot 2 Deposited Plan 8974	CB411/132
	Lot 1 Deposited Plan 8974	CB411/131
329 Manchester Street	Part Town Section 197 City of Christchurch	CB364/145
333 Manchester Street	Part Section 197 Town of Christchurch	CB38B/376

Robson, Gina

From: Sam Kealey <sam@townplanning.co.nz>
Sent: Monday, 15 May 2023 1:40 pm
To: Engagement
Cc: Anita Collie
Subject: RE: PC14 Lodgment of Submission missing (2975-23)
Attachments: Wigram Lodge - Plan Change 13 Submission - FINAL.pdf

Hi Aviva,

Correct for submission on PC14.

The submitter both **supports** and **opposes** the plan change as notified.

Submitters Details are:

Elizabeth Harris

Address for service:

PO Box 35
 Christchurch
 New Zealand 8140

Phone number for service:

0210573762

Agreement:

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

Yes, I would like to present my submission at a hearing in person.

Kind Regards,



Sam Kealey – Senior Planner

Cell: 021 057 3762 | Email: sam@townplanning.co.nz
 Town Planning Group | www.townplanning.co.nz
 Offices in Queenstown, Wānaka, Christchurch & Auckland

From: Engagement <engagement@ccc.govt.nz>
Sent: Monday, May 15, 2023 1:31 PM
To: Sam Kealey <sam@townplanning.co.nz>
Subject: RE: PC14 Lodgment of Submission missing (2975-23)

Kia ora Sam,

Just to confirm that you wanted me to make a submission on PC14 attaching this document? And your feedback is Oppose.

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: Sam Kealey <sam@townplanning.co.nz>

Sent: Monday, 15 May 2023 1:07 pm

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

Cc: Anita Collie <anita@townplanning.co.nz>

Subject: PC14 Lodgment of Submission missing (2975-23)

Hi There,

We have submitted the attached under PC13 however it should have also been submitted against PC14 as well, but we believe it has been missed when lodgement of all of our files took place.

Could we please have this also lodged against PC14 as well?

Let me know if you have any questions or queries.
And apologies for the confusion this may have caused.

Kind Regards,

**Sam Kealey – Senior Planner**

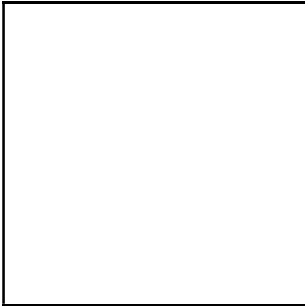
Cell: 021 057 3762 | Email: sam@townplanning.co.nz

Town Planning Group | www.townplanning.co.nz

Offices in Queenstown, Wānaka, Christchurch & Auckland

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Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Anita

Last name:

Collie

Organisation:

Malaghans Investments Limited

Preferred method of contact

Email

Attached Documents

Name
Plan Change 14 Submission - Malaghans Investments- FINAL

Form 5

Submission on notified proposal for a Plan Change

Clause 6 of Schedule 1, Resource Management Act 1991

To: **Christchurch District Council**

Name of Submitter: **Malaghans Investments Limited**

Introduction

1. This is a submission on Plan Change 13 (**PC13**) and Plan Change 14 (**PC14**) made by Malaghans Investments (**the submitter**). The submitter has interests in the property legally described as Lot 38 DP 10026 as held within the Record of Title CB492/224, located at 4 and 6 New Regent Street, Christchurch (**the Site**). The property is depicted in **Figure 1**.

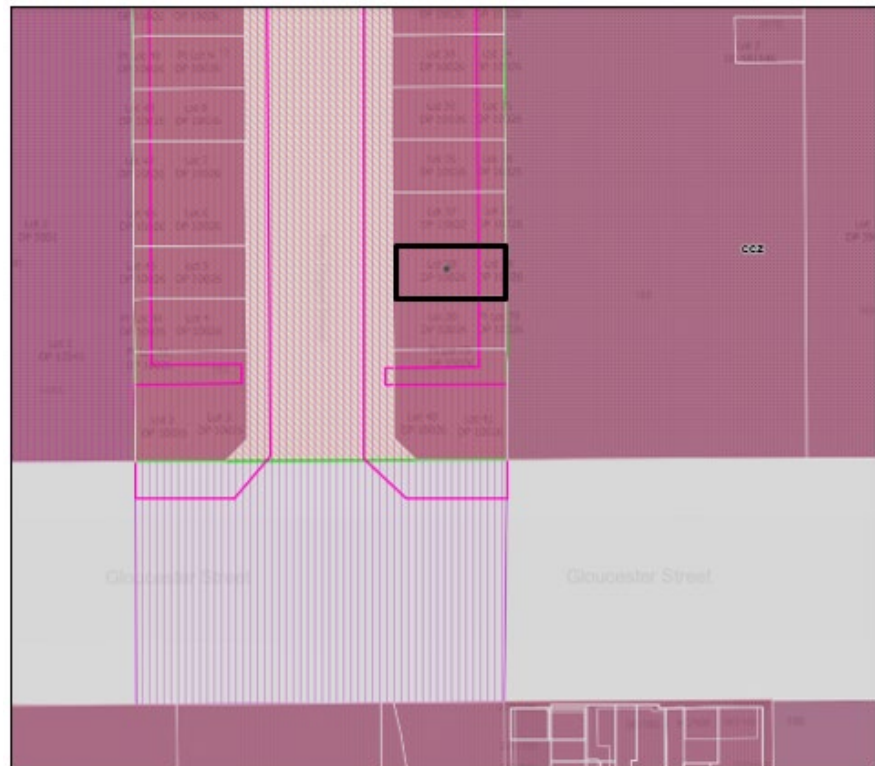


Figure 1 Site Location with zoning and overlays (CCC District Plan).

2. The property is located within the Commercial Central City Business Zone under the operative Christchurch District Plan. The site is proposed to be zoned City Centre Zone under PC14. The building is a heritage item within a heritage setting and is located in a New Regent Street Height Limit Qualifying Matter and Precinct.

Specific provisions of the plan change that this submission relates to

3. The submitter has an interest in both plan changes in their entirety and therefore this submission relates to all content of PC13 and PC14.
4. The submitter has a specific interest in all matters relating to the properties referred to above, New Regent Street and its surrounds.

Submission

5. The submitter both **supports** and **opposes** aspects of both plan changes as notified.
 - (a) The protection of historic heritage from inappropriate subdivision, use, and development is a matter of national importance that is required to be recognised and provided for – section 6(f) of the Resource Management Act 1991 (**RMA**).
 - (b) New Regent Street is noted as a significant heritage feature and the external facades of the building are a category 1 heritage item. The submitter supports the continued protection of the external heritage features of these buildings. Having the protection exclude the interiors enables a range of businesses and activities to more easily establish on the street, which has resulted in positive contributions to the setting and City as a whole.
 - (c) New Regent Street is one of the last, if not the very last, true heritage streets remaining in Central Christchurch after the devastating earthquakes of 2010 and 2011. From a practical and functional perspective, the street lies north-south. Given its low built form (around 8m) it is at direct and significant risk from inappropriate development occurring in the immediately surrounding area.
 - (d) Pre-quake, the street was impacted by the bulk and height of commercial buildings to the north (such as shading, dominance, wind funnelling). The street has flourished since the majority of the large buildings have been removed and access to sun light has been obtained once again. There has been an uplift in hospitality businesses and a clear uplift in people visiting the street for its amenity and heritage values (not just its business).
 - (e) Businesses, particularly hospitality, rely on the outdoor seating areas to attract customers to the area and their premises. The street seating is a direct way for people to be amongst the heritage setting, appreciate it while enjoying the custom of local businesses. Business owners facilitate non-customers using the street seating as way to enhance peoples access to the locale. Access to sunlight is critical to this.
 - (f) Cafes open at 8am and bars close in the late hours (3am). The street is a busy pedestrian thoroughfare. Every second building has an outdoor deck which, for the submitter's property, is well used by its customers.
 - (g) The submitter applauds to the Council for thinking about the issue of lack of sunlight and the significant effect that it would have on the heritage values, amenity and useability of the street.

The risk arising from the effects of high buildings near to this location is significant, as would be the effects on New Regent Street. The shading diagrams clearly show the significant effects arising from buildings 90m, 45m, 28m and lower.

- (h) There are additional properties in the locale that would also have significant effects that have not been modelled (particularly in the winter months). This includes:
 - (i) 156 Armagh Street
 - (ii) The block incorporating 180 to 196 Armagh Street (noting that some of this area has been modelled)
 - (iii) 273 and 277 Manchester Street
 - (iv) 165 to 173 Gloucester Street
- 6. New Regent Street is not far off its 100th anniversary and with the controls on the building (all of which have heritage covenants to require rebuilding), it should be expected to be around for at least another 100 years. Notably, PC14 seeks an 8m height restriction over these existing buildings but does not extend the same control to other existing buildings nearby that – if removed and rebuilt – would have at least the same level of significant adverse effects as those buildings forming part of the shading study.
- 7. Protection of access to sunlight for New Regent Street, along with commensurate changes to the District Plan to provide for this submission will:
 - (a) contribute to the social and economic well-being of people and communities and meet the reasonably foreseeable needs of future generations;
 - (b) protect the significant heritage values of New Regent Street and enhance visitor experience to the locale;
 - (c) represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.
 - (d) give effect to the National Policy Statement for Urban Development 2021 and Canterbury Regional Policy Statement.
 - (e) promote the sustainable management of natural and physical resources, will be consistent with Part 2 of the Resource Management Act 1991 and ultimately achieve its purpose.

Relief sought

- 8. The submitter seeks the following relief:
 - (a) that the Central City Heritage Interface overlay and its restrictions be expanded (to cover the area in blue shown in **Figure 1**), with further amendments to the District Plan to require that the building height for the properties bound by Gloucester,

Manchester, Oxford and Columbo streets (shown in **Figure 1**) be a maximum of no more than 3 stories in height above ground, with a specific policy included that requires the design for the site redevelopment to protect the heritage values of New Regent Street and to incorporate positive design features to accentuate the heritage precinct, rather than turn its back to it;

- (b) that the Central City Heritage Interface overlay includes all existing buildings and covers all of the area shown in the **Figure 2**, and any further amendment to give effect to s6(f) of the RMA and the protection and enhancement of the heritage values of New Regent Street and its surrounds;




Figure 2: Area to be included in height limit restriction coloured in blue (Plan Change Map CCC).

- (c) that a height breach within the area shown in **Figure 2** is a non-complying activity with a specific objective and policy included in the District Plan to avoid buildings over the height limit, avoid the loss of sunlight within all areas of the New Regent Street Precinct, that any new building must be designed to at least maintain current levels of access to sunlight;
- (d) that any inconsistencies between the provisions of PC13 and PC14 with respect to matters raised in this submission are amended as necessary to ensure that the plan provisions are clear and coherent for users;
- (e) any other additional or consequential relief to the District Plan, including but not limited to, the maps, issues, objectives, policies, rules, controls/discretions, assessment criteria and explanations that will give effect to the matters raised in this submission and protect and enhance the values of New Regent Street and its surrounds.

Other

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

DATED 12 May 2023

pp.  _____

Malaghans Investments

Address for Service:

Town Planning Group
PO Box 35
Christchurch

Contact Person:**Cell:****E-mail:**

Anita Collie
021 568 335
Anita@townplanning.co.nz

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Julie

Last name: Comfort

Organisation: Benrogan Estates Ltd

Preferred method of contact Email

Consultation Document Submissions

Provision: Planning Maps

Seek Amendment

I seek the following decision from the Council


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

Please see the attached submission

My submission is that:

Please see the attached submission

Attached Documents

Name
Benrogan Estates Ltd Submission to PC14 

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

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

1. Submitter Details

Submitters name: Benrogan Estates Limited

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

Contact person: julie.comfort@dls.co.nz

Phone: 03-379-0793

2. Trade Competition:

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

If Yes to above, then:

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

(a) adversely affects the environment; and

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

3. Hearing options:

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

☒ Yes ☐ No

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

☒ Yes ☐ No

4. Submission Details

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

Provision to which my/our submission relates: <i>(Please specify the Objective, Policy, Rule, Rule Requirement, Assessment Matter, Mapping feature or other reference your submission relates to, eg TCZ-R12 Visitor Accommodation)</i>	My position on this provision is: <i>(Select one option)</i>	The reasons for my/our submission are: <i>(Please give details, eg I think this should be non-complying because we don't want this to occur in our town centre)</i>	The decision I/we want Council to make: <i>(Please specify if you want the provision to be retained, amended or deleted, eg Amend – change the activity status to non-complying)</i>
Planning Maps	<input checked="" type="checkbox"/> Oppose in part	<p>Lots 1 and 2 DP 82730 and Lot 302 DP 571794 are greenfield development lots. As such it is more appropriate for this piece of land to be included within the Future Urban Zone.</p> <p>It is unclear why any of the residential land on the eastern side of Sutherlands Road that is within the Hendersons Outline Development Area is zoned Medium Density when the majority of this land has not yet been developed and therefore is more appropriately classified Future Urban Zone.</p> <p>This area has low public transport accessibility, as evidenced by this Qualifying Matter being applied to the adjoining Residential Suburban Zone. Given this it is considered the higher density residential enabled by the Medium Density Residential zoning is not appropriate in this location. In addition, it is unclear why the Council has not applied this Qualifying Matter to the RNN zoned land, particularly where there is no or limited public transport.</p>	Rezone the residential portions of Lots 1 and 2 DP 82730 and Lot 302 DP 571794, being 376, 388 and 396 Sparks Road Halswell from Medium Density Residential to Future Urban Zone
Planning Maps	<input checked="" type="checkbox"/> Oppose in part	<p>The submitter is undertaken a land transaction with Council where land owned by the submitter that is to be utilised as part of the stormwater basins is to be swapped for Council land. As part residentially zoned Council land has been utilised for stormwater purposes. To ensure that there is no loss in the developable residential land it is proposed to rezone approximately 1.5ha of rural land at 376 Sparks Road as shown on the plan in Attachment A.</p> <p>The Hendersons ODP is one of the few ODPs that has placed the majority of stormwater management areas outside of the residentially</p>	<ul style="list-style-type: none"> Rezone 1.58ha at 376 Sparks Road from Rural Urban Fringe to Future Urban Zone as shown on the attached plan in Attachment A.

Provision to which my/our submission relates: <i>(Please specify the Objective, Policy, Rule, Rule Requirement, Assessment Matter, Mapping feature or other reference your submission relates to, eg TCZ-R12 Visitor Accommodation)</i>	My position on this provision is: <i>(Select one option)</i>	The reasons for my/our submission are: <i>(Please give details, eg I think this should be non-complying because we don't want this to occur in our town centre)</i>	The decision I/we want Council to make: <i>(Please specify if you want the provision to be retained, amended or deleted, eg Amend – change the activity status to non-complying)</i>
		<p>zoned land. This was mainly due to the extensive knowledge of the ponding and flood storage that occurs within Hendersons Basin. As such, at the time of the District Plan hearings when the ODPs were developed it was envisaged that zoned land in this ODP would be available for residential purposes, with the rural land being utilised for stormwater purposes. However, Council's basins at 32 Sutherlands Road have utilised approximately 14ha of RNN zoned land for the basins. This has reduced the number of households able to be provided within this ODP by a minimum of 210 households. Given the flood ponding that occurs in Hendersons Basin, there is insufficient developable land within the ODP to make up this shortfall. We consider that this minor alteration of the Hendersons ODP and the residential zone will go somewhat to making up the shortfall in households that this ODP was anticipated to provide.</p>	
Rule 6.10A.4.1.1 P2	<input checked="" type="checkbox"/> Oppose in part	<p>It is appropriate for a greenfield subdivision to either provide street trees or pay a financial contribution for it.</p> <p>What is not considered appropriate is for a greenfield subdivision which is creating vacant lots for further development to have to also provide for or pay for the tree canopy cover for the residential units at the time of subdivision. The definition of development site as applied to a subdivision would encompass all the land contained within the subdivision, including roads and reserves. That would mean that the area of land within the roads would be counted twice – once for the 20% development site cover under point (a) and again for the 15% road corridor cover under point (c). These means that 20% cover calculated at the time of the subdivision would be much larger than for the individual residential allotments created. On seeking clarification from Council staff. It was suggested that a consent notice would be placed on the residential lots to require the 20% cover, as per point (a) of this rule. It's unclear whether this 20% would be the calculation of the</p>	<p>Amend the rule so that only the 15% street tree canopy requirement is applicable to a vacant lot greenfield subdivision.</p> <p>Delete Activity specific standards – Tree canopy cover clause (a) and (b), an amend clause (d) to only refer to the 15% road corridor cover.</p>

Provision to which my/our submission relates: <i>(Please specify the Objective, Policy, Rule, Rule Requirement, Assessment Matter, Mapping feature or other reference your submission relates to, eg TCZ-R12 Visitor Accommodation)</i>	My position on this provision is: <i>(Select one option)</i>	The reasons for my/our submission are: <i>(Please give details, eg I think this should be non-complying because we don't want this to occur in our town centre)</i>	The decision I/we want Council to make: <i>(Please specify if you want the provision to be retained, amended or deleted, eg Amend – change the activity status to non-complying)</i>
		overall development site as noted above, or for each lot. If it is for each lot, then requiring 20% cover under P2 is not necessary, as the development of each individual is covered by P1.	
6.10A.4.1.3 RD2	<input checked="" type="checkbox"/> Support in part	In greenfield subdivisions there are a number of situations where reserves are vested to Council with enhancements. For example, enhancing waterways. In these situations, reserve contributions are not attributed to these reserves. We therefore support the approach by Council that these reserves can offset the tree canopy rule requirements. However, we consider that this needs to be more explicit in the rules to ensure this happens	Amend to rule to make it clear that reserves that are vested to Council with enhancements can offset the tree canopy rules for the development.
8.2.6.2 8.3.3 Standard 6.10A.4.2.2	<input checked="" type="checkbox"/> Oppose in part	<p>There is no reasoning given in any of the Section 32 documentation for how the financial contribution of \$2,037.00 per tree has been calculated. Furthermore, it is unclear whether this is GST inclusive or not. The figure does not appear to relate to the Minimum Acceptable Rates provided for bonding under the IDS or for the maintenance period of 2 years.</p> <p>The CCC bond schedule for street trees allows for: For street trees that is \$500 per tree (includes the tree pit), and \$40 per tree per month for maintenance. Total per tree for 2 year bond period of \$1,460.00 all excl GST. With GST included that is only \$1,679.00.</p> <p>Assuming \$2,037 is excluding GST this is 1 tree plus 38.4 months maintenance. If Inc GST its 31.7 months of maintenance.</p>	Make clearer in the plan how the costs have been attributed and whether it is GST inclusive.
Standard 6.10A.4.2.3 8.2.6.3 8.3.7	<input checked="" type="checkbox"/> Oppose in part	It is unclear how Council will enforce the tree canopy rules on individual properties & within their own road reserve network. How will compliance be measured? Furthermore, will Council report on the compliance of the tree canopy rules and what projects the financial contributions go towards?	

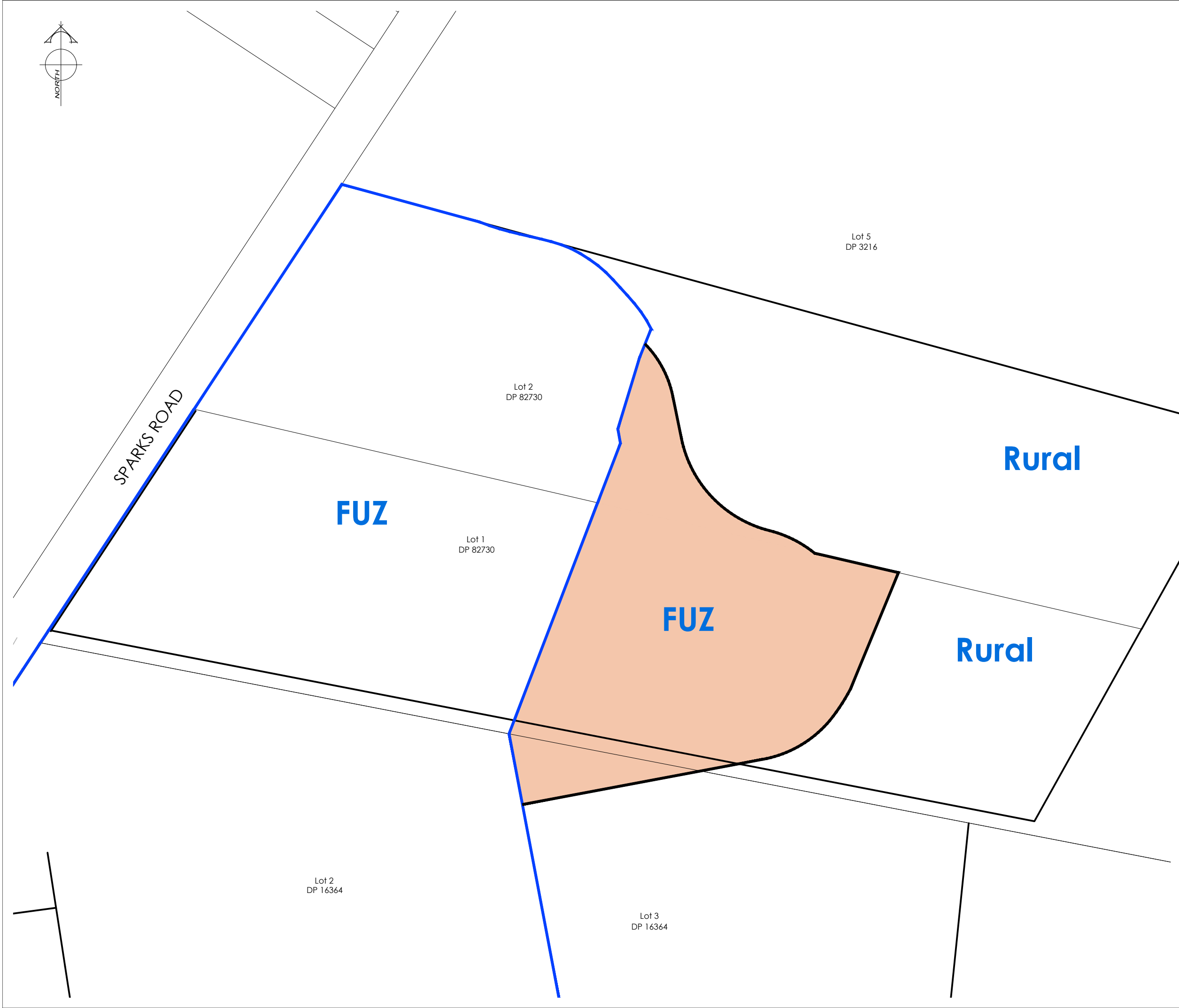
Provision to which my/our submission relates: <i>(Please specify the Objective, Policy, Rule, Rule Requirement, Assessment Matter, Mapping feature or other reference your submission relates to, eg TCZ-R12 Visitor Accommodation)</i>	My position on this provision is: <i>(Select one option)</i>	The reasons for my/our submission are: <i>(Please give details, eg I think this should be non-complying because we don't want this to occur in our town centre)</i>	The decision I/we want Council to make: <i>(Please specify if you want the provision to be retained, amended or deleted, eg Amend – change the activity status to non-complying)</i>
		<p>Issues could arise where the species planted may be appropriate at the time but due to unforeseen circumstances, the vegetation may die and need to be replaced.</p> <p>Based on previous experiences, when Council needs to cut budgets the first departments this is impacted on are the reserves and maintenance teams and the monitoring and enforcement teams.</p>	
Activity Standard 8.6.2	<input checked="" type="checkbox"/> Oppose in part	<p>It is unclear whether there is a minimum allotment for the FUZ when there is an existing building. The drafting of the provision as notified removes the reference to 'Nil' for the previous named zoned of RNN. We suggest it is clearer within the standard that there is no minimum allotment size in the FUZ zone around existing buildings.</p>	Amend the standard to make it clear that there is no minimum allotment size in the FUZ zone around existing buildings.

.....


12 May 2023

Signature of person authorised to sign on behalf of submitter

Attachment A – Proposed Rezoning Plan




AMENDMENTS :		
AMENDMENT	DATE	DESCRIPTION

NOTES :

1) This plan has been prepared for re zoning purposes only. No liability is accepted if the plan is used for any other purpose.

2) This plan has been prepared for the use of our client and no liability is accepted in relation to any other parties.

3) Any measurements taken from information which is not dimensioned on the electronic copy are at the risk of the recipient.



DAVIE LOVELL-SMITH
PLANNING SURVEYING ENGINEERING

116 Wrights Road P O Box 679 Christchurch 8140. New Zealand
Telephone: 03 379-0793 Website: www.dls.co.nz E-mail: office@dls.co.nz

JOB TITLE :

Benrogan Estates Limited

SHEET TITLE :

Proposed Rezoning

DRAWING STATUS

For Submission

SCALE : 1:1500@A3	DATE : May 2023
CAD FILE : J:\2023\SUBCON\2023 Re Zone.dwg	DRAWN : CR
DRAWING No : E20698	SHEET No : 1
	REVISION : R0

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Julie

Last name:

Comfort

Organisation:

Knights Stream Estates Ltd

Preferred method of contact

Email

Consultation Document Submissions

Provision: Planning Maps

Seek Amendment

I seek the following decision from the Council

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

Please see the attached submission

My submission is that:

Please see the attached submission

Attached Documents

Name
Knights Stream Estates Ltd Submission to PC14

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

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

1. Submitter Details

Submitters name: Knights Stream Estates Limited

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

Contact person: julie.comfort@dls.co.nz

Phone: 03-379-0793

2. Trade Competition:

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

If Yes to above, then:

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

(a) adversely affects the environment; and

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

3. Hearing options:

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

☒ Yes ☐ No

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

☒ Yes ☐ No

4. Submission Details

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

Provision to which my/our submission relates: <i>(Please specify the Objective, Policy, Rule, Rule Requirement, Assessment Matter, Mapping feature or other reference your submission relates to, eg TCZ-R12 Visitor Accommodation)</i>	My position on this provision is: <i>(Select one option)</i>	The reasons for my/our submission are: <i>(Please give details, eg I think this should be non-complying because we don't want this to occur in our town centre)</i>	The decision I/we want Council to make: <i>(Please specify if you want the provision to be retained, amended or deleted, eg Amend – change the activity status to non-complying)</i>
Planning Maps	<input checked="" type="checkbox"/> Oppose in part	Lots 30 DP 571567 is a Greenfield development block and as such it is considered appropriate that these sites should be zoned Future Urban Zone.	Rezone Lot 30 DP 571567 to Future Urban Zone.
Rule 6.10A.4.1.1 P2	<input checked="" type="checkbox"/> Oppose in part	<p>It is appropriate for a greenfield subdivision to either provide street trees or pay a financial contribution for it.</p> <p>What is not considered appropriate is for a greenfield subdivision which is creating vacant lots for further development to have to also provide for or pay for the tree canopy cover for the residential units at the time of subdivision. The definition of development site as applied to a subdivision would encompass all the land contained within the subdivision, including roads and reserves. That would mean that the area of land within the roads would be counted twice – once for the 20% development site cover under point (a) and again for the 15% road corridor cover under point (c). These means that 20% cover calculated at the time of the subdivision would be much larger than for the individual residential allotments created. On seeking clarification from Council staff. It was suggested that a consent notice would be placed on the residential lots to require the 20% cover, as per point (a) of this rule. It's unclear whether this 20% would be the calculation of the overall development site as noted above, or for each lot. If it is for each lot, then requiring 20% cover under P2 is not necessary, as the development of each individual is covered by P1.</p>	<p>Amend the rule so that only the 15% street tree canopy requirement is applicable to a vacant lot greenfield subdivision.</p> <p>Delete Activity specific standards – Tree canopy cover clause (a) and (b), an amend clause (d) to only refer to the 15% road corridor cover.</p>
6.10A.4.1.3 RD2	<input checked="" type="checkbox"/> Support in part	In greenfield subdivisions there are a number of situations where reserves are vested to Council with enhancements. For example,	Amend to rule to make it clear that reserves that are vested to Council with

Provision to which my/our submission relates: <i>(Please specify the Objective, Policy, Rule, Rule Requirement, Assessment Matter, Mapping feature or other reference your submission relates to, eg TCZ-R12 Visitor Accommodation)</i>	My position on this provision is: <i>(Select one option)</i>	The reasons for my/our submission are: <i>(Please give details, eg I think this should be non-complying because we don't want this to occur in our town centre)</i>	The decision I/we want Council to make: <i>(Please specify if you want the provision to be retained, amended or deleted, eg Amend – change the activity status to non-complying)</i>
		enhancing waterways. In these situations, reserve contributions are not attributed to these reserves. We therefore support the approach by Council that these reserves can offset the tree canopy rule requirements. However, we consider that this needs to be more explicit in the rules to ensure this happens	enhancements can offset the tree canopy rules for the development.
8.2.6.2 8.3.3 Standard 6.10A.4.2.2	<input checked="" type="checkbox"/> Oppose in part	<p>There is no reasoning given in any of the Section 32 documentation for how the financial contribution of \$2,037.00 per tree has been calculated. Furthermore, it is unclear whether this is GST inclusive or not. The figure does not appear to relate to the Minimum Acceptable Rates provided for bonding under the IDS or for the maintenance period of 2 years.</p> <p>The CCC bond schedule for street trees allows for: For street trees that is \$500 per tree (includes the tree pit), and \$40 per tree per month for maintenance. Total per tree for 2 year bond period of \$1,460.00 all excl GST. With GST included that is only \$1,679.00. Assuming \$2,037 is excluding GST this is 1 tree plus 38.4 months maintenance. If Inc GST its 31.7 months of maintenance.</p>	Make clearer in the plan how the costs have been attributed and whether it is GST inclusive.
Standard 6.10A.4.2.3 8.2.6.3 8.3.7	<input checked="" type="checkbox"/> Oppose in part	<p>It is unclear how Council will enforce the tree canopy rules on individual properties & within their own road reserve network. How will compliance be measured? Furthermore, will Council report on the compliance of the tree canopy rules and what projects the financial contributions go towards?</p> <p>Issues could arise where the species planted may be appropriate at the time but due to unforeseen circumstances, the vegetation may die and need to be replaced.</p> <p>Based on previous experiences, when Council needs to cut budgets the first departments this is impacted on are the reserves and maintenance teams and the monitoring and enforcement teams.</p>	

Provision to which my/our submission relates: <i>(Please specify the Objective, Policy, Rule, Rule Requirement, Assessment Matter, Mapping feature or other reference your submission relates to, eg TCZ-R12 Visitor Accommodation)</i>	My position on this provision is: <i>(Select one option)</i>	The reasons for my/our submission are: <i>(Please give details, eg I think this should be non-complying because we don't want this to occur in our town centre)</i>	The decision I/we want Council to make: <i>(Please specify if you want the provision to be retained, amended or deleted, eg Amend – change the activity status to non-complying)</i>
Activity Standard 8.6.2	<input checked="" type="checkbox"/> Oppose in part	It is unclear whether there is a minimum allotment for the FUZ when there is an existing building. The drafting of the provision as notified removes the reference to 'Nil' for the previous named zoned of RNN. We suggest it is clearer within the standard that there is no minimum allotment size in the FUZ zone around existing buildings.	Amend the standard to make it clear that there is no minimum allotment size in the FUZ zone around existing buildings.

.....


12 May 2023

Signature of person authorised to sign on behalf of submitter

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date: 12/05/2023

First name: Anita **Last name:** Collie

Organisation:
Athena Enterprises Limited and Josephine Enterprises Limited

Preferred method of contact Email

Attached Documents

Name
Plan Change 14 Submission- 9A and 9B Sheffield Cres-FINAL

Form 5
Submission on notified proposal for a Plan Change
 Clause 6 of Schedule 1, Resource Management Act 1991

To: **Christchurch District Council**

Name of Submitter: **Athena Enterprises Limited and
Josephine Enterprises Limited**

Background

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

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

Introduction

5. This is a submission on PC14 made by Athena Enterprises Limited and Josephine Enterprises Limited (**the submitters**). The submitters have interests in the properties at 9, 9A and 9B Sheffield Crescent (**the site**). The properties owned by Athena Enterprises Limited are legally described as Lot 5 DP 62637 as held within the Record of Title CB36D/950, Unit A Deposited Plan 66465 as held within the Record of Title CB39A/366. The property owned by Josephine Enterprises Limited is legally described as Unit B Deposited Plan 66465 as held within the Record of Title CB39A/367.
6. The properties are depicted in **Figure 1** below.

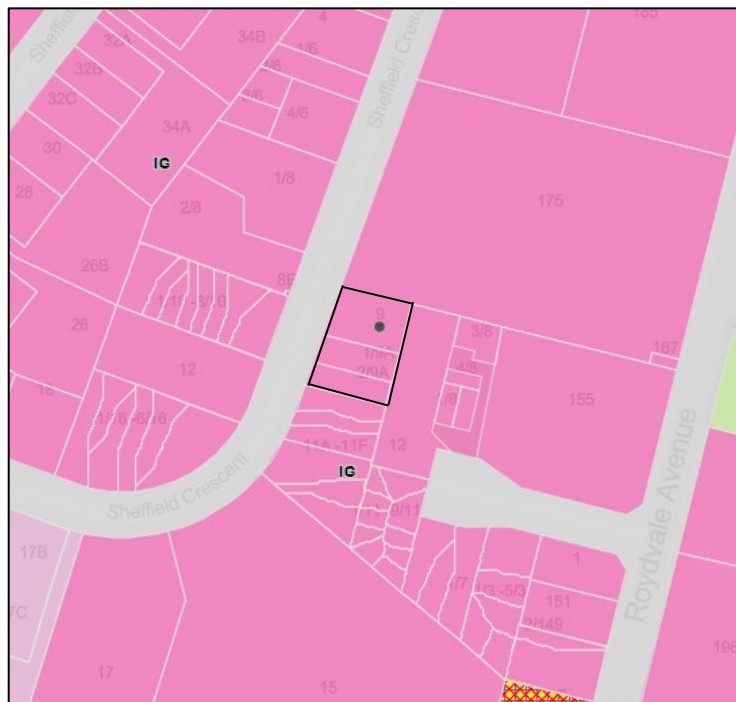


Figure 1 Location of the property within black boundaries, with zoning and overlays illustrated (CCC GIS).

7. The site is located within the Industrial General Zone under the operative District Plan. The site is proposed to remain zoned Industrial General Zone under PC14.

Specific provisions of the plan change that this submission relates to

8. The submitters have an interest in the plan change as a whole and therefore this submission relates to all the provisions and zonings of the plan change. The submitters have a specific interest in all provisions and zoning that relate to the properties referred to above.

Submission

9. The submitters **oppose** the plan change as notified. More specifically:
 - (a) the submitter supports the intensification of urban form to provide for additional development capacity, particularly near the city and commercial centres, and supports any provisions or changes to the District Plan that will achieve this outcome;
 - (b) Notably, the submitter considers that amendments are required to existing zones to enable the outcomes sought by PC14 to be realised;
 - (c) The submitter requests that the site is rezoned to an alternative zone that provides for more intense commercial activity (as defined), better giving effect to the NPS-UD than the status quo.
10. Policy 3 of the NPS-UD is of direct relevance, whereby at sub clause (d) it directs that the district plan is to enable building heights and density of urban form commensurate with the level of commercial activity and community services.
11. The submitter's site is developed with commercial buildings, which the submitters lease to several different commercial organisations. The tenancies include office activities, which have been established since the Canterbury Earthquakes and prior to the current version of the Christchurch District Plan. The character of activity on the site is commercial.
12. A commercial zone would more appropriately reflect the character of existing activity on the site. Office tenancies on the site have been long established but are not enabled or protected by the existing Industrial General zoning. The existing zoning does not reflect the high degree of established commercial and office activity on the site and in the surrounding area. The submitters consider that a commercial zoning would more appropriately reflect the existing environment.
13. Rezoning the site to an appropriate commercial zone along with commensurate changes to the District Plan to provide for this submission and give effect to the NPS-UD will:
 - (a) achieve the outcomes sought in PC14;
 - (b) contribute to the social and economic well-being of communities and meet the reasonably foreseeable needs of future generations;
 - (c) represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means;

- (d) give effect to the NPS-UD (notably Policy 3) and Canterbury Regional Policy Statement; and
- (e) promote the sustainable management of natural and physical resources, will be consistent with Part 2 of the Resource Management Act 1991 and ultimately achieve its purpose.

Relief Sought

14. The submitter seeks the following relief:
- (a) rezone the Site to an appropriate commercial zone which provides for a wide range of commercial activity (as defined) including offices; or
 - (b) include provisions to enable the range of matters outlined in paragraph 4 above that together assist with ensuring PC14 gives effect to the NPS-UD;
 - (c) any other additional or consequential relief to the District Plan, including but not limited to, the maps, issues, objectives, policies, rules, controls/discretions, assessment criteria and explanations that will give effect to the matters raised in this submission and the relevant planning legislation.

Other

15. The submitters could not gain an advantage in trade competition through this submission.
16. The submitters wish to be heard in support of their submission.
17. If others make similar submissions, the submitter will consider presenting a joint case at any hearing.

DATED 12 May 2023

pp.  _____

Athena Enterprises Limited and Josephine Enterprises Limited

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

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

Submitter Details

First name: Emma

Last name: Lewis

Organisation:

Naxos Enterprises Limited and Trustees MW Limited

Preferred method of contact	Email
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Attached Documents

Name
Plan Change 14 Submission-14 Field Tce-FINAL

Form 5
Submission on notified proposal for a Plan Change
 Clause 6 of Schedule 1, Resource Management Act 1991

To: **Christchurch District Council**

Name of Submitter: **Emma Mary Lewis, James William Lewis, Naxos Enterprises Limited, Trustees MW Limited**

Background

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

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

Introduction

- 5. This is a submission on PC14 made by Emma Mary Lewis, James William Lewis, Naxos Enterprises Limited, Trustees MW Limited (**the submitter**). The submitter has interests in the property legally described as Lot 2 DP 12606 as held within Record of Title CB488/131, located at 14 Field Terrace, Upper Riccarton, Christchurch (**the Site**).
- 6. The property is located within the Residential Suburban Zone under the operative District Plan. The site is proposed to be zoned Medium Density Residential under PC14.
- 7. The property is depicted in **Figure 1**.

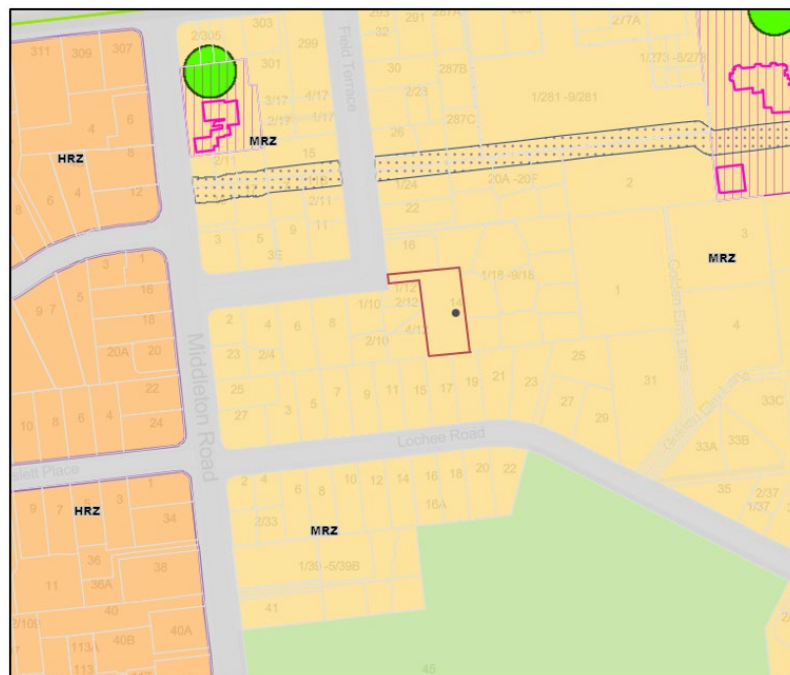


Figure 1 Site location and zoning (CCC GIS Map)

- 8. The property is located on Field Terrace which is a local road. The property has legal access from Field Terrace.

Specific provisions of the plan change that this submission relates to

- 9. The submitter has an interest in the plan change as a whole and therefore this submission relates to all provisions and zonings of the plan change. The submitter has a specific interest in all provisions and zoning that relate to the property referred to above.

Submission

10. The submitter both **supports** and **opposes** the plan change as notified. More specifically:
 - (a) the submitter supports the intensification of urban form to provide for additional development capacity, particularly near the city and commercial centres, and supports any provisions or changes to the District Plan that will achieve this outcome;
 - (b) the submitter opposes any provisions or changes that will adversely affect the outcome in (a); and
 - (c) requests that the submitter's site and properties in the surrounding and wider area (such that any rezoning is contiguous) are rezoned to the high density residential zone to provide for more intense residential activity, better reflecting the site context in the locale and being the most appropriate way to give effect to the NPS-UD.
11. The submitter's site and surrounding locale is ideally suited for a higher density of development, being in a location that exhibits a clear and immediate need for further housing supply in a convenient location to public transportation, and in walking distance to local schools and the Riccarton shopping centre. The site is sandwiched between two areas of high density residential zones and should be rezoned for consistency and continuation along the main trunk road of Riccarton Road.
12. The submitter also considers that the density standards as set out in the Amendment Act best achieve the NPS-UD, and PC14 should be amended to reflect those.
13. Rezoning the site to provide for high density residential development along with commensurate changes to the District Plan to provide for this submission and give effect to the NPS-UD will:
 - (a) enable more people to live in an urban environment where there is a high demand for housing in the area, relative to other areas in the urban environment;
 - (b) contribute to the social and economic well-being of communities and meet the reasonably foreseeable needs of future generations;
 - (c) represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means;
 - (d) give effect to the NPS-UD (notably Policy 3) and Canterbury Regional Policy Statement; and
 - (e) promote the sustainable management of natural and physical resources, will be consistent with Part 2 of the Resource Management Act 1991 and ultimately achieve its purpose.

Relief Sought

14. The Submitter seeks that the NPS-UD is properly and fully given effect to through the provisions and zoning of PC14 through the intensification of

development through enabling plan provisions and an increase in development capacity for residential and business use across the district.

15. The Submitter primarily seeks the following from the Council:
- (a) the submitters site and the surrounding properties are rezoned to High Density Residential or the proposed zone is amended to achieve similar outcomes as the High Density Zone by way of further intensification;
 - (b) reject, refuse, or otherwise decline the Qualifying Matters that do not align with that directed by the Central Government through the Amendment Act.
 - (c) any other additional or consequential relief to the District Plan, including but not limited to, the maps, issues, objectives, policies, rules, controls/discretions, assessment criteria and explanations that will give effect to the matters raised in this submission and the relevant planning legislation.

Other

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

DATED 12 May 2023

pp.  _____

Emma Mary Lewis, James William Lewis, Naxos Enterprises Limited, Trustees MW Limited

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

Contact Person: Anita Collie
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E-mail: Anita@townplanning.co.nz

Our proposed Housing and Business Choice Plan Change (14)

[Submitter Details](#)**Submission Date:** 12/05/2023**First name:** Jo**Last name:** Appleyard**Organisation:**


The Catholic Diocese of Christchurch

On behalf of:

The Catholic Diocese of Christchurch

Preferred method of contact Email

Attached Documents

Name
PC14 Submission - Catholic Diocese 3461-4216-7587 

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: The Catholic Diocese of Christchurch (*the Diocese*)

- 1 This is a submission on the proposed plan change 14 (PC14) to the Christchurch District Plan (the *District Plan*).
- 2 The Diocese could not gain an advantage in trade competition through this submission.
- 3 The Diocese's submission relates to the whole of PC14. The specific relief sought by the Diocese is set out at **Appendix 1** and the key points elaborated on below.
- 4 The Diocese wishes to be heard in support of the submission.
- 5 If others make a similar submission, the Diocese will consider presenting a joint case with them at a hearing.

PROPOSED CHANGES TO THE RESIDENTIAL ZONE CHAPTERS

- 6 By way of general feedback, the Diocese considers that PC14 fails to enable intensification, residential activity and building heights in the manner envisaged by the NPS-UD and Resource Management Act 1991.
- 7 More specifically, to the extent that greater provision for building heights and/or residential activity has been provided for throughout the City by way of the proposed changes, this is countered by the corresponding amendments to policy provisions, rules, activity status, and assessment matters which have the effect of introducing greater time, cost and uncertainty to projects.
- 8 In the Diocese's views, such changes undermine the intensification sought by the RMA and NPS-UD and they are not otherwise necessary or appropriate to promote intensification in a manner consistent with the stated purpose of PC14. Moreover, such changes are inconsistent with strategic directions in Chapter 3, and objective 3.3.2 in particular which requires (with our emphasis):

3.3.2 Objective - Clarity of language and efficiency

a. The District Plan, through its preparation, change, interpretation and implementation:

i. Minimises:

A. transaction costs and reliance on resource consent processes; and

B. the number, extent, and prescriptiveness of development controls and design standards in the rules, in order to encourage innovation and choice; and

C. the requirements for notification and written approval; and

ii. Sets objectives and policies that clearly state the outcomes intended; and

iii. Uses clear, concise language so that the District Plan is easy to understand and use.

- 9 In simple terms, the additional regulatory controls proposed are not enabling.
- 10 In the Diocese's views, greater use should be made of permitted or controlled activity status; and caution should be exercised in the drafting of policies and assessment criteria to ensure such provisions are clear, certain and are ultimately enabling and supportive of intensification.

PROPOSED CHANGES TO THE COMMERCIAL ZONE CHAPTER

- 11 In general terms, the proposed changes to commercial zones fail to 'enable' intensification in the manner envisaged by the NPS-UD, and policy 3 especially. Again, such changes are also inconsistent with strategic objective 3.3.2.
- 12 To the extent that intensification is provided for by PC14 (e.g. increased building heights), this is countered by the corresponding amendments to policy provisions, rules, activity status, and assessment matters which have the effect of 'disenabling' or further constraining development and adding time, cost and uncertainty to projects.
- 13 Such changes undermine the intensification sought by the NPS-UD and they are not otherwise necessary or appropriate to promote intensification in a manner consistent with the stated purpose of PC14.
- 14 In simple terms, the additional regulatory controls proposed are not enabling.
- 15 In the Diocese's views, greater use should be made of permitted or controlled activity status; and caution should be exercised in the drafting of policies and assessment criteria to ensure such provisions are clear, certain and are ultimately enabling and supportive of intensification.

FINANCIAL CONTRIBUTIONS POLICY

- 16 The proposed tree canopy cover and financial contributions provisions are unworkable and unreasonable.
- 17 The provisions are difficult to understand and create considerable uncertainty. For example:

- 17.1 If trees are retained over and above the 20% cover threshold will a financial credit be provided to the applicant?
- 17.2 It is not clear who would be qualified to undertake the assessment of the canopy cover.
- 17.3 The proposed definitions of PC14 introduce the definition of a 'hedge' with specific reference to the tree canopy cover and financial contributions provisions, yet those provisions do not utilise that term.
- 17.4 If a stormwater basin is heavily planted in native shrubs, should this receive a credit as plants (and not just trees) also provide for carbon sequestration?
- 17.5 How will the timing of assessment work in relation to consenting processes? For greenfield subdivisions for example, landscape plans are often not completed until after resource consent is issued.
- 18 The canopy cover provisions would be difficult to enforce. If canopy cover is determined as acceptable at the time of resource consent and 10 years or 15 years later one or some of those trees are cut down, who monitors and enforces that requirement? Does Council have the staff resources to maintain that level of monitoring across wide swathes of the city?
- 19 Councils increasingly seek a reduction in reserve areas within greenfield subdivisions, on the basis of ongoing maintenance costs for the Council. It would be very difficult to achieve a 20% of net site area coverage in most greenfield subdivisions, noting that those reserve areas are also required for other purposes such as playground and open grass for play areas, that are incompatible with extensive tree canopy cover.
- 20 The provisions require 20% of the net site area adjacent to road corridors to contain tree cover. Accommodating tree cover typically necessitates wider road corridors. Wider road corridors reduces land available for housing, in direct conflict with the existing District Plan provisions stipulating a minimum density of 15 hh/ha must be achieved for greenfield subdivision areas, and more generally the NPS-UD.
- 21 The cost implications of not achieving tree cover are considerable and, given the Diocese does not consider the 20% cover is achievable, will add further to development costs that are then passed onto purchasers.
- 22 The implications of this proposed policy are significant from an economic perspective and must be adequately justified by the Council. As it stands, the Diocese do not consider the Council has done this and therefore the proposed financial contributions policy should be deleted in its entirety.

SITE SPECIFIC MATTERS

- 23 The Diocese is considering its options for the location of a new Catholic cathedral to be constructed in Central Christchurch. Currently, the Diocese has three potential sites being considered for this. The Diocese seek a rule be included in PC14 that

would enable the construction of such a cathedral on one of these sites. The proposed wording for this rule is set out in **Appendix 1**.

Armagh Street Site

- 24 The Diocese have interests in the land bounded by Oxford Terrace, Manchester Street, Armagh Street, and Colombo Street as shown below:



Figure 1: Approximate outline of Armagh Street Site shown in yellow

- 25 This location is one of three potential sites for the construction of a new Catholic Cathedral.
- 26 The Diocese support the zoning of this site as City Centre Zone. However, there are a number of aspects of PC14 that the Diocese oppose in respect of the Armagh Street Site:

The New Regent Street heritage setting

- 26.1 The Diocese oppose the extent of the heritage setting for New Regent Street (being heritage setting 336 associated with heritage item 404 in Appendix 9.3.7.2 schedule).
- 26.2 The Diocese oppose the identification of this heritage setting to the northern most edge of Armagh Street and consider the setting should end at the southern most edge of Armagh Street, being where New Regent Street meets Armagh Street. Among other reasons, the Diocese consider that the modern buildings fronting Armagh Street at either end of New Regent Street or the Armagh Street road reserve have no apparent heritage values that warrant a heritage setting.
- 26.3 There is no basis for why this heritage setting extends as far as it does.

Central City Heritage Interface

- 26.4 Part of this site is subject to the proposed 'Central City Heritage Interface' overlay. This overlay is strongly opposed by the Diocese. The Diocese considers there is no basis or justification for such an overlay over the Armagh Street Site. Among other reasons, the Diocese notes that the site has no identified heritage values and is surrounded by roads, that provide an adequate interface to and separation from other sites in the area, including those which may have heritage value.
- 26.5 It is also unclear why there are no objectives or policies introduced into the Historic Heritage chapter of the plan by PC14 in respect of these heritage interface sites. This gives very little direction to plan users as to their utility and/or relevance.
- 26.6 On this basis, the Diocese therefore seek:
- (a) the heritage interface overlays in general (maps and any associated provisions) are removed from PC14; or
 - (b) the Central City Heritage Interface relating to New Regent Street is removed; or
 - (c) at the very least, the Central City Heritage Interface is removed from the above site.

The Barbadoes Street Site

- 27 The Diocese have interests in the land bounded by Ferry Road, Moorhouse Avenue, and Barbadoes Street as shown below:



Figure 2: Approximate outline of Barbadoes Street Site shown in yellow

- 28 This location is one of three potential sites for the construction of a new Catholic Cathedral.
- 29 The Diocese support the underlying zoning of this site as Central City Mixed Use Zone (CCMUZ). However, the Diocese oppose the following with respect to the Barbadoes Street Site:

Incorrect mapping of heritage item

- 29.1 136 Barbadoes Street previously housed the Cathedral of the Blessed Sacrament (the *Cathedral*), a highly significant heritage item (item number 46), before it was demolished pursuant to a section 38 notice issued by the Canterbury Earthquake Recover Authority.
- 29.2 PC14 proposes to remove the Cathedral from the Schedule of Significant Historic Heritage in Appendix 9.3.7.2 of the District Plan. The Diocese support this change on the basis that the Cathedral has now been demolished and the site no longer contains any heritage items or values.

29.3 However, the Cathedral is still showing as a heritage item in the Council's electronic proposed map¹ for PC14 (as well as PC13). The Diocese consider it is likely that this is an administrative error where the removal of the listing in the plan was not properly reflected in the electronic planning maps.

29.4 Given both PC13 and PC14 proposes to remove the heritage listing for the Cathedral, it is no longer appropriate for any of the planning maps to show a heritage item on the site. The Diocese therefore seek that the heritage listing shown at 136 Barbadoes Street is removed from the electronic planning map.

The Manchester Street Site

- 30 The Diocese have interests in the land located at 373 and 375 Manchester Street as shown below:



Figure 3: Approximate outline of Manchester Street Site shown in yellow

- 31 This location is one of three potential sites for the construction of a new Catholic Cathedral.

¹<https://christchurchcity.maps.arcgis.com/apps/webappviewer/index.html?id=ad65227f17a8492aa9191f4c665a3d0a#propertymaps>

- 32 The Diocese oppose the underlying High Density Residential Zone (*HRZ*) and seek that the Manchester Street Site be rezoned CCMUZ. CCMUZ land is located directly opposite the Diocese's site on Manchester Street. Rezoning the Manchester Street Site to CCMUZ will provide for a contiguous enlargement of the current CCMUZ on Manchester Street. There are also other pockets of CCMUZ in the wider vicinity of the Manchester Street Site that are similarly sized and the rezoning would therefore be consistent with the CCMUZ zoning pattern.
- 33 The Diocese wishes to retain the current Specific Purpose (School) zoning that currently sites on the Manchester Street site. The underlying zoning is relevant in the event that the site is redeveloped for other purposes, including for a new Cathedral. A spiritual facility the size of a Cathedral would be a non-complying activity under the HRZ provisions, and for this reason CCMUZ is sought instead.

Signed for and on behalf of the Catholic Diocese of Christchurch by its solicitors and authorised agents Chapman Tripp



Jo Appleyard
Partner
12 May 2023

Address for service of submitter:

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APPENDIX 1

No.	Provision	Position	Submission	Relief Sought
Chapter 1 Introduction				
1.	General feedback – 1.3.4.2	Neutral	PC14 proposes explanatory text regarding the potential infrastructure constraints for development that is enabled by the District Plan and PC14. The submitter considers this text is ultimately helpful to readers of the District Plan but is concerned at this possibility eventuating.	Retain as notified

No.	Provision	Position	Submission	Relief Sought
Chapter 2 Abbreviations and definitions				
1.	Definition - Accessory building	Oppose	<p>PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.</p> <p>For example, attached accessory buildings may require consent where they would otherwise be permitted in other zones (e.g.</p>	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
			attached garages, solar heating devices, etc).	
2.	Definition of 'Alteration'	Oppose	The definition has the effect of meaning that any change, modification or addition to a heritage item, heritage setting or heritage fabric, or a building in a heritage area will constitute an 'alteration' and trigger corresponding rules and consent requirements, irrespective of whether it impacts on heritage fabric. This will create unnecessary, costly and inefficient consent requirements, and provide no benefits in respect of heritage.	Retain status quo.
3.	Definition - Building	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications (e.g. for swimming pools, decks, balconies, etc).	Retain status quo.
4.	Definition - Building Base	Oppose	This definition is opposed to the extent that it relates to the constraint of building heights, in a manner that is inconsistent with the NPS-UD and is not otherwise necessary or appropriate for the purposes of promoting intensification.	Delete

No.	Provision	Position	Submission	Relief Sought
5.	Definition - Building Tower	Oppose	This definition is opposed to the extent that it relates to the constraint of building heights, in a manner that is inconsistent with the NPS-UD and is not otherwise necessary or appropriate for the purposes of promoting intensification.	Delete
6.	Definition - Building Coverage	Oppose in part	The definition refers to 'building footprint' however that term is not coloured/underlined so as to refer to the corresponding definition.	Amend such that the term 'building footprint' is marked with reference to the corresponding definition of this term.
7.	Definition - Building Footprint	Oppose in part	The definition is not clear, insofar that it refers to refers to 'any section of any of those buildings that extends out beyond the ground floor level limits of the building and overhangs the ground'.	Amend to provide greater clarity.
8.	Definition of 'Contributory building'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Regardless, the proposed definition is vague and provides little certainty as to whether buildings would or would not constitute a contributory building.	Delete.
9.	Definition – Coverage	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
			between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.	
10.	Definition of 'Defining building'	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.</p> <p>Regardless, the proposed definition is vague and provides little certainty as to whether buildings would or would not constitute a defining building.</p>	Delete.
11.	Definition of 'Demolition'	Oppose	The amended definition has the effect of meaning that any destruction of a non-substantial part of a building constitutes 'demolition' and triggers corresponding rules and consent requirements. This will create unnecessary, costly and inefficient consent requirements for inconsequential partial demolition work, create conflict with the definition of 'alteration', and provide no benefits in respect of heritage.	Retain status quo.
12.	Definition – Development site	Support	The proposed definition sensibly enables sites to be defined and assessed for the purposes of compliance, notwithstanding that they may not fall within the mandatory definition of 'site' under the National Planning Standards.	Retain as notified.

No.	Provision	Position	Submission	Relief Sought
13.	Definition – Dripline	Oppose	This definition is deleted, evidently, on the basis that it will be replaced by a new definition of 'Tree protection zone radius'. The dripline definition is preferred on the basis that it is more readily understood.	Retain status quo.
14.	Definition – Fine grain	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete.
15.	Definition – Ground level	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.	Retain status quo.
16.	Definition – Gust Equivalent Mean (GEM)	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete.
17.	Definition – Habitable room	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation insofar that it refers to 'a similarly occupied room'.	Delete.

No.	Provision	Position	Submission	Relief Sought
18.	Definition – Heat island	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete.
19.	Definition – Hedge	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete.
20.	Definition – Height	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.	Retain status quo.
21.	Definition of 'Heritage setting'	Oppose	The amended definition removes the wording that a setting ' <i>together with the associated heritage item, has met the significance threshold</i> ' and instead states that ' <i>Heritage settings have not been assessed as meeting the significance threshold for scheduling</i> '. The submitter considers that heritage settings that do not meet the significance threshold for scheduling should not be listed, with associated regulatory requirements.	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
22.	Definition of 'Heritage Building Code works'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for insulation and glazing upgrades.	Retain as proposed.
23.	Definition – Human scale	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete
24.	Definition of 'Intrusive building or site'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Regardless, the proposed definition is vague and provides little certainty as to whether buildings or sites would or would not be intrusive.	Delete.
25.	Definition of 'Neutral building or site'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Regardless, the proposed definition is vague and provides little certainty as to whether buildings or sites would or would not be categorised as neutral.	Delete.
26.	Definition – Outdoor living space	Support	The definition provides greater clarity and certainty than the status quo.	Retain as notified.

No.	Provision	Position	Submission	Relief Sought
27.	Definition – Pedestrian access	Oppose	The definition (insofar as it refers to a 'dedicated pathway') precludes other forms of pedestrian access or shared spaces that adequately serve the same purpose.	Amend definition as follows: A dedicated pathway that provides access for pedestrians from the street to a residential unit and to any parking area for that residential unit
28.	Definition – Perimeter block development	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete
29.	Definition of 'Reconstruction'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for additional forms of reconstruction.	Retain as proposed.
30.	Definition of 'Relocation'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. As such, the submitter opposes the definition of relocation insofar that it relates to heritage areas. Further, the submitter opposes the deletion of the exclusions in (a) and (b) that otherwise sensibly exclude temporary relocation or realignment works.	Retain status quo.
31.	Definition of 'Repairs'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for additional forms of repairs.	Retain as proposed.

No.	Provision	Position	Submission	Relief Sought
32.	Definition – Residential unit	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.	Retain status quo.
33.	Definition of 'Restoration'	Supports	The amended definition provides greater clarity and certainty.	Retain as proposed.
34.	Definition – Site	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications. As noted above, the submitter supports the definition 'development site' and the use of this term in relevant rules.	Retain status quo.
35.	Definition – Tree	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete or alternatively amend to specify a potential height of at least 3m.

No.	Provision	Position	Submission	Relief Sought
			Furthermore, the definition is unreasonably restrictive insofar that it specifies a minimum potential height of 5m.	
36.	Definition – Tree canopy cover	Oppose	The definition is very broad and relies on tree cover achieving expected growth over a 20 year time frame. It is unclear how the Council intends to cover the cost of enforcement over a 20+ year time frame for all new developments.	Delete
37.	Definition – Tree protection zone radius	Oppose	The definition is complex and is open to conflicting interpretation. The definition of 'dripline' is preferred.	Delete

No.	Provision	Position	Submission	Relief Sought
Chapter 3 Strategic Directions				
1.	Clause 3.1(v) Introduction	Support	The additional text appropriately recognises the need to <i>'Facilitate an increase in the supply of housing, and provide for a wide range of housing types and locations, to give effect to the [relevant statutory] provisions enabling development...'</i>	Retain as notified.

No.	Provision	Position	Submission	Relief Sought
2.	Objective 3.3.2	Support	The objective is appropriate to ensure the effective and efficient preparation, change, interpretation and implementation of the District Plan.	Retain as notified.
3.	Objective 3.3.7	Oppose	The proposed wording in clauses (a)(i)-(iv) of this objective seeks to define a 'well-functioning urban environment' in a way that does not necessarily reflect, and risks narrowly framing, policy 1 of the NPS-UD. Whilst some aspects of these clauses are appropriate, others are not.	<p>Amend by deleting the test following the words 'into the future' as follows:</p> <p><i>3.3.7 Objective – Well-functioning urban environment</i></p> <p><i>a. 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></p> <p><i>i. Within commercial and residential zones</i></p> <p><i>...</i></p> <p><i>iv. The benefits of urban environments that support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.</i></p>
4.	Objective 3.3.8(viii)	Oppose	The proposed wording in clauses (viii) is not consistent with the requirements of NPS-UD policy 1. As worded, the proposed policy may require outcomes that are not practicable and are not required by NPS-UD policy 1.	<p>Amend as follows:</p> <p><i>viii. Has good Improves overall accessibility <u>for all and connectivity (including through opportunities for walking, cycling and public transport)</u> for people <u>between housing, jobs, community services, natural spaces, and open spaces including by way of public or active transport, transport (including opportunities</u></i></p>

No.	Provision	Position	Submission	Relief Sought
				for walking, cycling and public transport) and services; and
5.	Objective 3.3.10(ii)(E)	Oppose	<p>Consistent with its submissions on sub chapter 6.10A, the submitter considers the provisions relating to tree canopy cover and financial contributions in their entirety are unworkable and onerous.</p> <p>The submitter further notes, that if the Council are wanting to enhance and grow the City's biodiversity and amenity this should also go hand in hand with Council agreeing to accept larger and more frequent recreational reserve areas. Over the past 5 – 7 years Council have pushed back against numerous developer proposals to increase reserve areas which would assist in meeting these proposed objectives.</p>	Delete.

No.	Provision	Position	Submission	Relief Sought
Chapter 6 General Rules & Procedures, Sub Chapter 6.1A Qualifying Matters				
1.	6.1A.1, Table 1 Qualifying Matters	Oppose	<p>Whilst the rationale for qualifying matters expressed in 6.1A.1(a) and (b) is acknowledged, a number of the matters identified in Table 1 are not warranted,</p>	Delete or otherwise amend Table 1 and the extent of Qualifying Matters in a manner consistent with the relief sought by the submitter on other provisions in PC14.

No.	Provision	Position	Submission	Relief Sought
			<p>accounting for the relevant matters in sections 77I or 77O.</p> <p>Among other reasons, a number of qualifying matters are considered to be less enabling of development to more than the extent necessary to accommodate the identified qualifying matters; and/or such matters have not been adequately evaluated and justified accounting for the costs imposed and the limitations on development capacity that is otherwise sought by the NPS-UD.</p> <p>The submitter is particularly concerned with qualifying matters relating to:</p> <p>(a) Heritage areas, items and their settings – noting the operative District Plan provisions relating to heritage adequately provide for such matters.</p> <p>(b) Natural hazards – noting operative District Plan provisions and the submission points above regarding proposed amendments to chapter 5.</p> <p>(c) Residential zones</p> <p>(d) Commercial zones</p>	

No.	Provision	Position	Submission	Relief Sought
Chapter 6 General Rules & Procedures, Sub Chapter 6.10A Tree Canopy Cover and Financial Contributions				
1.	General/all	Oppose	The provisions in their entirety concerning tree canopy cover and financial contributions (including related definitions and amendments to strategic objectives) are unworkable and onerous.	Delete all of the financial contributions draft provisions in their entirety.
2.	6.10A.1	Oppose	The provision begs the question: If trees are retained over and above the 20% cover threshold will a financial credit be provided to the applicant?	
3.	6.10A.1c	Oppose	Greenfield subdivision does not generally cause the loss of tree canopy cover, there is generally a net gain in canopy cover as such subdivision is typically over open paddocks. Furthermore, Council itself has been responsible for a reduced canopy cover through the adoption of policies of density, road widths, off-sets from infrastructure, reduction in reserves to vest, all based around maintenance obligations and council budgets.	
4.	6.10A.1d	Oppose	There is currently no "Urban Forest Plan" setting out the Council target. Therefore, how is anyone expected to know if this is even realistic? This section also refers to financial contributions to cover the cost of tree pits construction within road corridors. This should exclude Greenfield sites where developers are already required as part of their	

No.	Provision	Position	Submission	Relief Sought
			subdivision consent to include street trees within new road corridors.	
5.	Objective 6.10A.2.1	Oppose	<p>For the reasons expressed in the submission points above, the objective is generally opposed.</p> <p>Otherwise, the objective fails to account for the particular characteristics of residential activity, its location or other contextual matters that may make this objective unachievable or inappropriate. For example, residential activities within multi-level apartment buildings in the core of the Central City could not practicably '[maintain] <i>existing trees and/or</i> [plant] <i>new trees as part of the development</i>', as required by the objective.</p>	
6.	Policy 6.10A.2.1.1	Oppose	For the same reasons expressed in regards Objective 6.10A.2.1 and otherwise noting the practical difficulties of monitoring and enforcing the tree canopy percentages over time, this policy is opposed.	
7.	Policy 6.10A.2.1.2	Oppose	<p>For the same reasons expressed in regards to the submission points above, the policy is opposed.</p> <p>Among other things, the maintenance of required tree canopy is impractical to monitor and enforce and requiring financial contributions from those who do not meet the requirements but not from those who may provide the canopy and subsequently remove it. This policy is inequitable and unworkable.</p>	

No.	Provision	Position	Submission	Relief Sought
8.	Policy 6.10A.2.1.3	Oppose	<p>The requirements for tree planting (in terms of location, soil volume, etc) are unnecessarily and unreasonably prescriptive and remove property owners' reasonable freedom and choice to landscape their properties as they choose. Moreover, such requirements are difficult to monitor and enforce on an ongoing basis (e.g. as new owners or tenants choose to re-landscape) and are unnecessary accounting for the control or discretion in regards to these matters where trees are expressly required through resource consent processes.</p> <p>Consent notices in respect of tree planting are an unreasonable and onerous requirement, and are considered impracticable for enforcing residential landscaping which is commonly and regularly altered to reflect changing needs and preferences over time. Consent notices are likely to be overlooked or ignored, or impose costly and inefficient regulatory processes to retrospectively address landscaping works in breach of consent notices.</p> <p>Policies relating to trees in road reserve are unnecessary, noting that such trees can be adequately managed by Council in its capacity as road controlling authority.</p>	
9.	6.10A.3	Oppose	<p>The provisions in this section are generally opposed. Further, clause (c) is considered unclear, insofar as providing 'guidance' on tree species and other 'requirements' and whether these external documents will essentially be imposed as rules.</p>	

No.	Provision	Position	Submission	Relief Sought
10.	6.10A.4	Oppose	The rules are opposed in their entirety for the reasons expressed above.	
11.	6.10A.4(a)	Oppose	The explanatory note setting out the application of the rules is arbitrary, unclear and open to interpretation. Among other concerns, it requires a judgement of whether subdivision or development is 'able to contain a ground floor residential unit' irrespective of whether that is proposed, commercially viable, or otherwise.	
12.	6.10.A.4.1	Oppose	The rules are opposed in their entirety for the reasons expressed above and noting they are arbitrary, unclear and open to interpretation. Among other concerns, the rules apply to 'any residential development except for extensions or accessory buildings...', which might capture non-built improvements (as residential development), such as hard or soft landscaping works, internal alterations, first floor additions, etc.	
13.	6.10.A.4.2	Oppose	The rules are opposed in their entirety for the reasons expressed above and noting they are arbitrary, unclear and open to interpretation and debate. Aside from the monetary costs imposed by the rule, the administration of the rule imposes significant costs insofar as it requires an independent registered valuation. The rules are clearly in conflict with strategic objective 3.3.2.	

No.	Provision	Position	Submission	Relief Sought
14.	6.10.A.4.2.3	Oppose	Consent notices in respect of tree planting are an unreasonable and onerous requirement, and are considered impracticable for enforcing residential landscaping which is commonly and regularly altered to reflect changing needs and preferences over time. Consent notices are likely to be overlooked or ignored, or impose costly and inefficient regulatory processes to retrospectively address landscaping works in breach of consent notices.	

No.	Provision	Position	Submission	Relief Sought
Chapter 7 Transport				
1.	General/all	Oppose	The proposed provisions in their entirety concerning transport are onerous and unnecessary and are not necessary for the purposes of implementing the NPS-UD or the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.	Delete the proposed provisions to the Transport Chapter in their entirety.
2.	Policy 7.2.1.2 (xi) High trip generating activities	Oppose	Requiring the reduction of greenhouse gas emissions from vehicular trips associated with all high trip generating activities is not necessary, practicable or appropriate. Requirements for cycle parking and end of trip facilities, removal of minimum parking	

No.	Provision	Position	Submission	Relief Sought
			requirements, and non-statutory measures such as improved walking/cycling/PT facilities otherwise adequately reduce greenhouse gas emissions from vehicular trips.	
3.	Policy 7.2.1.9 Pedestrian Access	Oppose	The requirements of the policy are onerous, subjective and otherwise unnecessary accounting for the existing provisions in the plan concerning pedestrian access and urban design matters. The submitter is also concerned that requiring all pedestrian access to be of a width and grade suitable for all users, may not be appropriate or practicable in all cases.	
4.	Rule 7.4.3.7(b) Access Design	Oppose	For the reasons expressed in regards policy 7.2.1.9, the requirements for pedestrian access in this rule are opposed.	
5.	Rule 7.4.3.7(d) Access Design	Oppose	The requirement for either an audio and visual warning device or visibility splay for all sites on the same side of the road as a major cycle route in all zones, irrespective of the nature of the activity or its vehicle generation is unnecessary and onerous.	

No.	Provision	Position	Submission	Relief Sought
6.	Rule 7.4.3.8 Vehicle Crossings And Rule 7.4.3.13 Co-location of Vehicle Crossings	Oppose	The requirements in 7.4.3.13 (as referred to in rule 7.4.3.8) are unnecessary, onerous and impractical. Among other concerns, the submitter notes that the rule creates a 'first in first served' situation for vehicle crossings which in greenfield residential areas may be problematic where adjoining sites are designed and / or obtain building consent, resource consents and / or vehicle crossing permits at a similar time with no knowledge of adjacent crossing positions.	
7.	Rule 7.4.4.18(a)(v ii) and advice note vii in Table 1 Assessment matters for high trip generators	Oppose	For the reasons expressed in regards Policy 7.2.1.2 (xi) above, this assessment matter is opposed. Aside from those reasons, the submitter also considers it impractical from a commercial, monitoring and enforcement perspective to require ' <i>measures to be implemented and maintained over the lifetime of the activity</i> '.	
8.	Rule 7.4.4.27 Assessment matters for pedestrian access	Oppose	For the reasons expressed in regards Policy 7.2.1.9 and Rule 7.4.3.7(b) above, this assessment matter is opposed.	

No.	Provision	Position	Submission	Relief Sought
9.	Rule 7.4.4.28 Assessment matters for vehicle crossing co location	Oppose	For the reasons expressed in regards Rule 7.4.3.8 above, this assessment matter is opposed.	
10.	Table 7.5.2.1 – Minimum numbers of cycle parks required	Oppose	Increased requirements for cycle parking for social housing and residential units are opposed on the basis that the requirements are prescriptive and inflexible, and any additional cycle parking needs are best determined by the developer accounting for the needs of future residents, or informally provided as required. The proposed amendments will add unnecessary development costs, or onerous consenting requirements and will likely reduce development capacity.	
11.	Table 7.5.3.1 – Minimum numbers of loading spaces required	Oppose	Requirements for on-site loading for residential activities are opposed on the basis that the requirements are prescriptive and inflexible, and any loading needs are best determined by the developer accounting for the needs of future residents, or informally provided as required (including through on-street loading facilities). Requiring on-site loading (where car parking is not otherwise required and loading is not	

No.	Provision	Position	Submission	Relief Sought
			<p>presently required) will reduce development capacity and/or significantly increase the costs of development, accounting for the corresponding requirements for on-site access (and other requirements, such as on site turning, vehicle crossing constraints, etc) to facilitate on site loading. Informal loading, or temporary or permanent loading on-street is more effective, efficient and appropriate.</p> <p>The proposed amendments will otherwise add unnecessary development costs, or onerous consenting requirements.</p>	
12.	Appendix 7.5.7 Access design and gradient	Oppose	The amended requirements for access are unnecessary and will result in unreasonable development costs, reduced development capacity, and/or onerous consenting requirements.	

No.	Provision	Position	Submission	Relief Sought
Chapter 8 Subdivision, Development and Earthworks				
1.	8.1 Introduction	Oppose in part	To the extent that additional wording is proposed that specifically refers to 'development' a definition or further clarification of what this term relates to is necessary. In the absence of such	Delete, or provide a definition or explanation of the term 'development'.

No.	Provision	Position	Submission	Relief Sought
			clarification, the term is unclear and open to interpretation	
2.	8.2.2.2 Policy Allotments	Support	The amendments are pragmatic and support the provision of increased development capacity or alternative forms of housing supply and associated changes in tenure.	Retain.
3.	Policy 8.2.2.7 Urban density	Support	The amendments are pragmatic and support the provision of increased development capacity, whilst sensibly recognising constraints to achievement of minimum yields and other development constraints.	Retain.
4.	Objective 8.2.3 Infrastructure and transport	Support	The objective sensibly provides for engineering solutions that do not affect the 'existing' capacity of the wastewater system, without prescriptively limiting what those solutions may entail.	Retain.
5.	Policy 8.2.3.1 Infrastructure constraints	Oppose in part	To the extent that additional wording is proposed that specifically refers to 'development' a definition or further clarification of what this term relates to is necessary. In the absence of such clarification, the term is unclear and open to interpretation	Delete, or provide a definition or explanation of the term 'development'.
6.	Policy 8.2.3.2 Availability of infrastructure	Oppose in part	To the extent that additional wording is proposed that specifically refers to 'development' a definition or further	Delete, or provide a definition or explanation of the term 'development'.

No.	Provision	Position	Submission	Relief Sought
			<p>clarification of what this term relates to is necessary. In the absence of such clarification, the term is unclear and open to interpretation.</p> <p>Clause (g) is otherwise supported for the same reasons expressed in respect of objective 8.2.3 above.</p>	
7.	Objective 8.2.6 and policies 8.2.6.1-8.2.6.3 Urban tree canopy cover	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete
8.	Rule 8.3.1 (e) and (f) Urban tree canopy cover	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete
9.	Rule 8.3.3 (b) financial contributions	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete
10.	Rule 8.3.7 consent notice	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete

No.	Provision	Position	Submission	Relief Sought
11.	Rule 8.4.1.1 Notification	Support	The amended notification requirements are supported, accounting for the directions in the EHS Act.	Retain as notified.
12.	Rule 8.5	Support	The provisions are generally supported, to the extent that they are consistent with the submitters other submission points.	Retain as notified.
13.	Rule 8.6.1 Table 1 – Minimum net site areas - residential	Oppose in part	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Further, the proposed 450m2 minimum net site area is opposed on the basis that it conflicts with the objectives in the NPS-UD and District Plan to provide for the most intensive and efficient scale and form of development within Central City areas.	Delete.
14.	Rule 8.6.1 Tables 2 – 5 Minimum net site areas – other zones	Support	The amendments proposed to Tables 2-5 are supported.	Retain the changes as proposed to Rule 8.6.1 Tables 2 – 5.
15.	Rule 8.7.12 Tree canopy assessment matters	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete.

No.	Provision	Position	Submission	Relief Sought
16.	8.9 Rules-Earthworks	Support	The amended provisions in rule 8.9 are generally appropriate.	Retain as notified.

No.	Provision	Position	Submission	Relief Sought
Chapter 9 Natural and Cultural Heritage, Sub Chapter 9.3 Historic Heritage				
1.	Policy 9.3.2.2.2 Identification, assessment and scheduling of heritage areas	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.	Delete.
2.	Policy 9.3.2.2.3 - Management of scheduled historic heritage	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.</p> <p>The amendments to clause (b) of this policy are also opposed. The operative wording within this policy sensibly recognises that Significant (Group 2) heritage items are potentially capable of accommodating a greater degree of change than Highly Significant (Group 1) heritage items.</p>	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
3.	Policy 9.3.2.2.5 Ongoing use of scheduled historic heritage	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to this policy are opposed.	Retain status quo.
4.	Policy 9.3.2.2.8- Demolition of scheduled historic heritage	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to clause (a) of this policy are opposed.</p> <p>In addition, the changes to clause (a)(ii) are opposed insofar that they introduce a new 'test' for evaluating the demolition of historic heritage that presents an unreasonable and inappropriate threshold that materially changes and undermines the policy. By way of example, the proposed wording may preclude the demolition of heritage items that are significantly (physically) compromised, on the basis of one or more (non-physical) heritage values (e.g. historical/social or cultural/spiritual value) remaining.</p>	Retain status quo.
5.	Rule 9.3.3 How to interpret and	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the	Delete all references to heritage areas.

No.	Provision	Position	Submission	Relief Sought
	apply the rules		changes to this rule, insofar that they relate to heritage areas are opposed.	
6.	9.3.4 Rules-Historic heritage	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, changes to this rule, insofar as they relate to heritage areas are opposed.	Delete all references to heritage areas within rule 9.3.4, including (and in particular) rules RD6-RD8.
7.	Matters of discretion 9.3.6.1(a)	Oppose	The submitter opposes the deletion of clause (a), given that damage incurred as a result of the Canterbury earthquakes of 2010 and 2011 including the costs of repair and reconstruction, remains a relevant matter for consideration.	Retain status quo for 9.3.6.1(a).
8.	Matters of discretion 9.3.6.1(p)	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters under clause (p) are opposed.	Delete proposed 9.3.6.1(p).
9.	Matters of discretion 9.3.6.4	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters in rule 9.3.6.4 are opposed.	Delete proposed rule 9.3.6.4.

No.	Provision	Position	Submission	Relief Sought
10.	Matters of discretion 9.3.6.5	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters in rule 9.3.6.5 are opposed.	Delete proposed rule 9.3.6.5.
11.	Matters of discretion 9.3.6.6	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters in rule 9.3.6.6 are opposed.	Delete proposed rule 9.3.6.6.
12.	Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items	Oppose	For the reasons stated in the covering submission, the listing of the item and setting at 32 Armagh Street (and 325 Montreal Street) is inappropriate. Accordingly, this listing should be deleted.	Delete Heritage Item 390 and Heritage Setting 287 regarding 32 Armagh Street from Appendix 9.3.7.2.
13.	Appendix 9.3.7.3 Schedule of Significant Historic Heritage Areas	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to this schedule are opposed.	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
14.	Appendix 9.3.7.4 Heritage item and heritage setting exemptions	Oppose	The exemptions provided in Appendix 9.3.7.4 are an important tool for incentivising the adaptive reuse and ongoing protection of heritage items. As such, the amendments proposed to this appendix which reduce the extent of exemptions is inconsistent with the Plan's objectives in relation to heritage and section 6 of the Act.	Retain the status quo.
15.	Appendix 9.3.7.7 – Residential Heritage Areas - Aerial Maps	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Appendix 9.3.7.7 should be deleted.	Delete.
16.	Appendix 9.3.7.8 – Residential Heritage Areas – Site Contributions Maps	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Appendix 9.3.7.8 should be deleted.	Delete.
17.	Appendix 9.3.7.9 – Residential Heritage Areas – Interface Sites and	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Appendix 9.3.7.9 should be deleted.	Delete.

No.	Provision	Position	Submission	Relief Sought
	Character Area Overlay Maps			

No.	Provision	Position	Submission	Relief Sought
Chapter 13.6 SP School				
1.	Policy 13.6.2.1.2 Effects on neighbourhoods	Support	The amended wording of this policy heading better reflects the provisions in the NPS-UD and is supported.	Adopt.
2.	13.6.4.1.3 Restricted discretionary activities	Support	The amended wording within the table (insofar as it refers to 'Effects on...') better reflects the provisions in the NPS-UD and is supported.	Adopt.
3.	13.6.4.1.3 RD5	Support in part	The proposed rule is generally supported, however restricted discretionary status is not 'enabling' and accounting for the development intensity envisaged by the NPS-UD in high density residential areas, the submitter considers controlled activity status for this provision is more appropriate.	Amend rule 13.6.4.1.3 RD5, such that it is a controlled activity standard.

No.	Provision	Position	Submission	Relief Sought
4.	13.6.4.2.1 Maximum site coverage	Oppose in part	The submitter opposes the amendments to the rule, to the extent that it will impose greater constraints on building site coverage than the status quo. This will limit development capacity in a manner that is inconsistent with the NPS-UD.	Retain the status quo, insofar that the amendments propose greater constraints on building site coverage than the status quo.
5.	13.6.4.2.2 Height in relation to boundary	Oppose in part	The submitter opposes the amendments to the rule, to the extent that it will impose greater constraints on building height in relation to boundaries than the status quo. This will limit development capacity in a manner that is inconsistent with the NPS-UD.	Retain the status quo, insofar that the amendments propose greater constraints on building height in relation to boundaries than the status quo.
6.	13.6.4.2.3 Minimum building setback from road boundaries	Oppose in part	The submitter opposes the amendments to the rule, to the extent that it will impose greater building setbacks from road boundaries than the status quo. This will limit development capacity in a manner that is inconsistent with the NPS-UD.	Retain the status quo, insofar that the amendments propose greater building setbacks from road boundaries than the status quo.
7.	13.6.4.2.4 Minimum building setback from internal boundaries and maximum	Oppose in part	The submitter opposes the amendments to the rule, to the extent that it will impose greater building setbacks from internal boundaries and/or constraints on building length, relative to the status quo. This will limit development capacity in a manner that is inconsistent with the NPS-UD.	Retain the status quo, insofar that the amendments propose greater building setbacks from internal boundaries and/or constraints on building length, relative to the status quo.

No.	Provision	Position	Submission	Relief Sought
	building length			
8.	13.6.4.2.5 Maximum building height	Support	The amendments better enable development capacity and are supported.	Adopt.
9.	13.6.4.2.6 Landscaping	Oppose	The submitter opposes this new rule, noting it will limit development capacity in a manner that is inconsistent with the NPS-UD.	Delete.
10.	13.6.5.1 Effects on the neighbourhood	Oppose	The submitter opposes the proposed amendments to the assessment matter, noting it will impose additional constraints on and uncertainty for developments, and in doing so will limit development capacity in a manner that is inconsistent with the NPS-UD.	Delete.
11.	Appendix 13.6.6.2 State Integrated Schools	Support in part	<p>The Diocese seek that the alternative zoning of their integrated school sites appropriately reflects the likely future use of the land by the Diocese, whilst also accounting for the surrounding environment.</p> <p>The identification of alternative zones in the Appendix is generally supported, however the Diocese seeks the following amendments:</p>	<p>Amend Appendix 13.6.6.2 State Integrated Schools, so that the alternative zone for:</p> <ul style="list-style-type: none"> St Mary's School at Manchester Street is 'CCMUZ'; and St Teresa's on Puriri Street is 'HRZ' <p>Otherwise, retain the wording in the Appendix, insofar as it relates to the alternative zoning of all other state integrated schools.</p>

No.	Provision	Position	Submission	Relief Sought
			<ul style="list-style-type: none"> St Mary's school in Manchester Street is identified in this appendix with an underlying zoning of HRZ. This is opposed, and CCMUZ is sought as the underlying zone to better provide for spiritual activities on the site and align with the CCMUZ on the opposite side of Manchester Street. St Teresa's on Puriri Street, Riccarton is identified with an underlying MRZ. However, given the site's position adjacent to Riccarton Road, proximity to the Riccarton KAC, and the extent of the HRZ nearby, an underlying zoning of HRZ is considered more appropriate. 	

No.	Provision	Position	Submission	Relief Sought
Chapter 14 Residential				
Objectives & Policies				
1.	Objective 14.2.1	Support	The amendments to the objective are appropriate and better reflect the provisions of the NPS-UD.	Adopt.

No.	Provision	Position	Submission	Relief Sought
2.	Policy 14.2.1.1	Support	The amendments to the policy are appropriate and better reflect the provisions of the NPS-UD. They otherwise appropriately remove unnecessarily prescriptive references to minimum densities for different zones.	Adopt.
3.	Policy 14.2.1.2	Support	The deletion of the policy is supported.	Adopt
4.	Policy 14.2.1.2	Support	The deletion of the policy is supported, accounting for the changes proposed in response to the NPS-UD and Amendment Act.	Adopt
5.	Policy 14.2.1.3	Support	The deletion of the policy is supported, accounting for the changes proposed in response to the NPS-UD and Amendment Act.	Adopt
6.	Policy 14.2.3.6	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt
7.	Policy 14.2.3.7	Oppose	The proposed policy is opposed, insofar as it states that increased buildings heights should 'only' be provided for where the matters listed in i-v. of the policy are achieved. Such requirements are not	Delete.

No.	Provision	Position	Submission	Relief Sought
			required by or consistent with the NPS-UD and Amendment Act.	
8.	Objective 14.2.5	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
9.	Policy 14.2.5.1	Oppose	The proposed policy is opposed, insofar as it stipulates site layout and building design requirements that are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.	Delete.
10.	Policy 14.2.5.2	Support	The proposed amendments to the policy are supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
11.	Policy 14.2.5.3	Oppose	The proposed policy is opposed, insofar as it stipulates site layout and building and landscaping design requirements that are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.	Delete.
12.	Policy 14.2.5.4	Oppose	The proposed policy is opposed, insofar as it stipulates on site waste and recycling requirements that are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.	Delete.

No.	Provision	Position	Submission	Relief Sought
13.	Policy 14.2.5.5	Oppose	<p>The proposed policy is opposed, insofar as it stipulates wind management requirements that are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.</p> <p>The submitter is particularly concerned at the cost and practical implications of providing assessments in accordance with this policy, noting the highly specialised expertise required (with associated cost, availability and time implications).</p> <p>The submitter is also concerned at the potentially subjective nature of aspects of the policy.</p>	Delete.
14.	Policy 14.2.5.6	Support	The proposed amendments to the policy are supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
15.	Objective 14.2.6	Support	The proposed objective is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
16.	Policy 14.2.6.2	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.

No.	Provision	Position	Submission	Relief Sought
17.	Objective 14.2.7	Support	The proposed objective is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
18.	Policy 14.2.7.1	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
19.	Policy 14.2.7.2	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
20.	Policy 14.2.7.3	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
21.	Policy 14.2.7.4	Support in part	The proposed policy is generally supported, accounting for the directives within the NPS-UD and Amendment Act. However, the submitter is concerned as to the potentially inappropriate constraints on development resulting from the words 'and restrict development to solely within...'. The proposed policy is generally supported, accounting for the directives within the NPS-UD and Amendment Act. However, the submitter is concerned as to the potentially inappropriate constraints on development	Amend to delete the words ',and restrict development to solely within,'.
22.	Policy 14.2.7.5	Support	The proposed policy is generally supported, accounting for the directives within the NPS-UD and Amendment Act. However, the submitter is concerned as to the potentially inappropriate constraints on development	Amend to delete the words ',and restrict development to solely within,'.

No.	Provision	Position	Submission	Relief Sought
			resulting from the words 'and restrict development to solely within...'.	
23.	Policy 14.2.7.6	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
24.	Objective 14.2.8	Support	The proposed objective is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
Rules Introduction				
1.	14.3 (f)	Oppose	For the reasons set out in their submission on sub chapter 6.1A, the submitter opposes the extent of qualifying matters listed and seeks that this rule be amended in a manner consistent with the relief sought on that chapter.	Delete, in a manner consistent with the submission on chapter 6.1A.
RS and RSDT Zones				
1.	Rule 14.5.3.1.3 Area-specific restricted discretionary activities	Oppose.	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 14.5.3.1.3 should be deleted.	Delete.
2.	Rule 14.4.2.2 Tree and	Oppose	The proposed amendments incorporating tree planting rules are opposed for the	Delete.

No.	Provision	Position	Submission	Relief Sought
	garden planting		reasons expressed in regards Chapter 6.10A.	
RMD Zones				
1.	Rule 14.5	Oppose	<p>The submitter generally opposes any/all amendments to the RMD zone provisions, to the extent that these conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.</p> <p>In the submitter's view, such requirements are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.</p> <p>Specific provisions of concern are further noted in the submission points below.</p>	Delete all new or amended provisions, to the extent that they conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.
2.	Rule 14.5.2 Built form standards	Oppose	<p>Proposed new built form standards or amendments to existing standards are opposed to the extent that they conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.</p> <p>Specific amendments requiring deletion include:</p>	Delete all new or amended provisions, to the extent that they conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.

No.	Provision	Position	Submission	Relief Sought
			<p>Rule 14.5.2.2 (c)-(e) – landscaping & tree canopy</p> <p>Rule 14.5.2.9 - fences</p> <p>Rule 14.5.2.12 – ground floor habitable room</p> <p>Rule 14.5.2.13 – service, storage & waste spaces</p> <p>Rule 14.5.2.15 – garaging and carport location</p> <p>Rule 14.5.2.17 – location of mechanical ventilation</p> <p>Rule 14.5.2.18 – City Spine Transport corridor</p>	
3.	Rule 14.5.2.4 (c) Site coverage	Support	The exemption for eaves and roof overhangs is supported.	Adopt.
4.	Rule 14.5.3.1.3 Area-specific restricted discretionary	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 14.5.3.1.3 RD15 should be deleted.	Delete.

No.	Provision	Position	Submission	Relief Sought
	activities RD15			
5.	Rule 14.5.3.2 Area-specific built form standards	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 14.5.3.2 should be deleted, insofar that this concerns heritage areas. This includes:</p> <p>Rule 14.5.3.2.3 Building Height</p> <p>Rule 14.5.3.2.7 Residential units per site</p> <p>14.5.3.2.8 Setbacks</p> <p>14.5.3.2.9 Building coverage</p> <p>14.5.3.2.10 Outdoor living space per unit</p>	<p>Delete the following rules, insofar that they refer to Heritage areas:</p> <p>Rule 14.5.3.2.3 Building Height</p> <p>Rule 14.5.3.2.7 Residential units per site</p> <p>14.5.3.2.8 Setbacks</p> <p>14.5.3.2.9 Building coverage</p> <p>14.5.3.2.10 Outdoor living space per unit</p>
High Density Residential Zone Provisions				
1.	Rule 14.6	Oppose	<p>The submitter generally opposes any/all amendments to the High Density Residential zone provisions, to the extent that these conflict with or are less enabling than the mandatory MDRS, the directives in NPS-UD policy 3, and/or impose additional constraints relative to the status quo.</p> <p>In the submitter's view, such requirements are not otherwise required by, or are</p>	<p>Delete all new or amended provisions, to the extent that they conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.</p>

No.	Provision	Position	Submission	Relief Sought
			<p>inconsistent with, the NPS-UD and Amendment Act.</p> <p>Specific provisions of concern are further noted in the submission points below.</p>	
2.	Rule 14.6.1.3	Oppose	<p>Rules 14.6.1.3 RD6-RD23 entail requirements that are onerous, inefficient and ineffective and which will limit development capacity. Such requirements are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.</p> <p>A number of these standards are complex or unclear and do not accord with the requirements of objective 3.3.2.</p> <p>As restricted discretionary activities, these standards are not enabling of development, as required by the Amendment Act. If such standards are found to be appropriate, they should be imposed as controlled activity standards.</p>	Delete, to the extent that the proposed amendments conflict with or are less enabling than the mandatory MDRS.
3.	Rule 14.6.2.1 Building height	Oppose, in part	Whilst provision for increased building height is supported, a 14m building height is inadequate for a high density residential zone within the central city, where Policy 3 (c) of the NPS-UD directs that development of up to six stories is to be 'enabled'.	Amend, so as to provide for a 23m maximum building height.

No.	Provision	Position	Submission	Relief Sought
			In order to 'enable' development of up to six stories a height limit of 23m as a permitted activity is required for this zone.	
4.	Rule 14.6.2.2 height in relation to boundary And Appendix 14.16.2	Oppose	<p>The submitter opposes the height in relation to boundary QM and submits that only the angles and heights that must be included from Schedule 3A, Part 2, Density Standards (12) Height in Relation to Boundary of the Housing Supply Act be included in the District Plan.</p> <p>The QM/ appendix compromises the enablement of development and does not reduce regulatory constraints and increase housing supply as required through the Amendment Act and the NPS-UD.</p>	Amend Rule 14.6.2.2 and Appendix 14.16.2, to align with Schedule 3A, Part 2, Density Standards (12) Height in Relation to Boundary of the Amendment Act.
5.	Rule 14.6.2.5 Building separation	Oppose	The requirements of this rule are not required by and are inconsistent with, the NPS-UD and Amendment Act.	Delete.
6.	Rule 14.6.2.6 Fencing and screening	Oppose	The requirements of this rule are not required by and are inconsistent with, the NPS-UD and Amendment Act.	Delete.
7.	Rule 14.6.2.7 Landscaping and tree canopy cover	Oppose	The requirements of this rule are not required by and are inconsistent with, the NPS-UD and Amendment Act. The requirements will limit development capacity	Delete.

No.	Provision	Position	Submission	Relief Sought
			and are otherwise opposed for the reasons expressed in the submission on chapter 6.10A.	
8.	14.6.2.12 Building Coverage	Oppose	<p>50% site coverage is not appropriate in the HRZ Zone given that there are currently no building coverage limitations in the Residential Central City Zone. This rule is more restrictive than the current operative provisions. There should be no site coverage limit in the HRZ.</p> <p>The rule compromises the extent to which planning provisions enable development and does not reduce regulatory constraints and increase housing supply as required through the Amendment Act and the NPS-UD.</p>	Delete.
9.	<p>Rule 14.15.3(a) impacts on neighbouring property</p> <p>Matters of control and discretion</p>	Oppose	<p>The submitter considers that Clause 14.15.3 (a) need simplifying and amending to ensure it appropriately addresses the rules to which it relates. The rule is headed 'impacts on neighbouring properties' yet many of the matters do not relate to effects on neighbouring properties. The long list of matters is not in accordance with the enabling provisions of the NPS-UD.</p> <p>The extent of discretion compromises the extent to which planning provisions enable development and does not reduce regulatory constraints and increase housing supply as</p>	<p>Amend rule 14.15.3(a) as follows:</p> <p><i>a. Whether the increased height, or reduced setbacks, or recession plane intrusion would result in buildings that do not compromise the amenity of adjacent properties planned urban built character, taking into account. The following matters of discretion apply...</i></p> <p>[i.e. delete the balance of clause (a)]</p>

No.	Provision	Position	Submission	Relief Sought
			required through the Amendment Act and the NPS-UD.	

No.	Provision	Position	Submission	Relief Sought
Chapter 15 Commercial				
Chapter 15 objectives & policies:				
1.	General feedback re policies	Oppose	PC14 fails to include policy provisions that explicitly implement the NPS-UD directives in Policy 3 in regards to building height and provide clear expectations in regards to the heights of buildings, particularly in the central city.	Insert a new and explicit policy in regards to anticipated building heights, consistent with NPS-UD policy 3.
2.	Policy 15.2.2.1 (Role of Centres)	Support with amendment	<p>Amendments anticipating 'high' rather than 'medium' density housing in and around town centre and local centre zones are generally supported.</p> <p>In respect of Table 15.1, Avonhead Mall is identified as a 'small' Local Centre, which has corresponding implications in respect of development potential. In respect of building height especially, such centres are constrained to 12m building height which is equivalent to the height permitted in surrounding residential zones and limits the</p>	Amend Table 15.1 to reclassify Avonhead as a Local Centre (<u>large</u>), rather than Local Centre (small).

No.	Provision	Position	Submission	Relief Sought
			<p>potential/practical intensification of this commercially zoned land resource.</p> <p>Given the extent of intensification provided for in the surrounding residential catchment (and likely increase in population as a consequence) and the absence of other commercial centres and activity in this catchment, a corresponding level of intensification at Avonhead mall is appropriate.</p> <p>Such intensification could occur without escalating the status of Avonhead in the commercial centres hierarchy (to a TCZ) by reclassifying the centre as a Local Centre (large).</p>	
3.	Objective 15.2.3 (Office parks & mixed use areas)	Support	The wording of this provision is generally supported.	Adopt.
4.	Policy 15.2.3.2 (Mixed use areas)	Support	The wording of this provision is generally supported.	Adopt.

No.	Provision	Position	Submission	Relief Sought
5.	Objective 15.2.4 (urban form, scale & design outcomes)	Support with amendment	<p>With the exception of clauses (a)(iv) and (vi) the wording is supported.</p> <p>In respect of clause (a)(iv) and (vi) the requirement for individual developments to 'manage adverse effects... that contribute to climate change' and 'support a reduction in greenhouse gas emissions' is uncertain and difficult to apply/administer for individual applications.</p> <p>Whilst such objectives are commendable, they should be directed at broader patterns of development rather than individual applications.</p>	<p>Amend clause (a)(iv) and (vi) as follows:</p> <p><i>iv. manages adverse effects (including reverse sensitivity effects) on the site and surrounding environment, including effects that contribute to climate change; and</i></p> <p><i>... vi. Promotes a zoning and development framework that supports a reduction in greenhouse gas emissions.</i></p>
6.	Policy 15.2.4.1 (Scale & form of development)	Oppose in part	<p>The proposed amendments to clause (a) of this policy introduce wording that is unclear, subjective and inappropriate. Clause (a) also seeks to constrain building heights and form within the central city in a manner that is inconsistent with the NPS-UD and the Amendment Act.</p> <p>Clause (b) of the policy is supported.</p>	<p>Delete the amendments to clause (a) of the policy.</p> <p>Adopt the amendments to clause (b) of the policy.</p>
7.	Policy 15.2.4.2 (Design of new development)	Oppose in part	<p>Clause (a) of this policy 'requires' new development to meet the various requirements listed in sub-clauses (i)-(x). Accordingly, it is important that those requirements are appropriately framed in terms of the outcomes sought, the certainty</p>	<p>Amend clause (a) of the policy as follows:</p> <p><i>a. Require new development to be well-designed and laid out by:</i></p> <p>...</p>

No.	Provision	Position	Submission	Relief Sought
			<p>they provide and the extent to which they support the purpose of PC14 to 'enable a greater scale and density of residential and business development in urban areas'.</p> <p>Against this context, the proposed amendments to this policy are opposed on the basis that they are uncertain, unreasonable, and/or do not support the purpose of PC14.</p> <p>Proposed amendments to the balance of the policy are supported.</p>	<p><i>viii. achieving a visually <u>appealing attractive</u> setting when viewed from the street and other public spaces, <u>that embodies a human scale and fine grain</u>, while managing effects on adjoining environments;</i></p> <p>[delete proposed clauses x-xv.]</p> <p>Retain the balance of the policy and amendments as proposed.</p>
8.	Policy 15.2.5.1 (Cathedrals in the Central City)	Oppose in part	Amend the policy to include reference to all three potential new cathedral sites as set out in the covering submission. Noting that part of the Barbadoes Street Site is already included in this Policy.	Amend Policy 15.2.5.1 to provide for a new catholic cathedral at one of the three sites identified in the covering submission.
9.	Policy 15.2.6.3 (Amenity)	Oppose in part	The proposed wording in clause (a)(ii) is opposed, insofar that this relates to constraints on built form which limit development capacity in a manner that is inconsistent with the NPS-UD and Amendment Act.	Delete the proposed amendments in clause (a)(ii).
10.	Policy 15.2.6.4	Oppose in part	Whilst <i>some</i> of the proposed additions to this policy concern matters that may be relevant considerations for new residential developments (e.g. as assessment matters),	Delete the proposed amendments in clauses (a)(vi)-(viii).

No.	Provision	Position	Submission	Relief Sought
	(Residential intensification)		<p><i>requiring</i> such matters within the policy potentially escalates their importance and may impose a 'policy barrier' to applications where the provision these requirements is not appropriate, necessary, or practicable.</p> <p>And, as set out in other submission points, a number of these matters are considered unnecessary and inappropriate, for the purposes of promoting intensification.</p> <p>Accordingly, the proposed additions to the sub-clauses within the policy should be deleted.</p>	
11.	Policy 15.2.6.5 (Pedestrian focus)	Oppose	<p>As set out in other submission points, controls on wind generation are opposed due to the difficulties of evaluating such effects with certainty and the practical limitations on obtaining such assessments. Moreover, changes to wind generation and the pedestrian environment are a necessary tradeoff contemplated by the NPS-UD, insofar as it directs maximum intensification of central city environments.</p> <p>The proposed amendment is otherwise unnecessary and inappropriate, for the purposes of promoting intensification.</p> <p>Accordingly, the proposed addition to the policy should be deleted.</p>	Delete.

No.	Provision	Position	Submission	Relief Sought
12.	Policy 15.2.7.1 (Diversity of activities)	Support	The policy is an enabling policy encouraging a diversity of activities and the amendments are supported.	Adopt.
13.	Policy 15.2.8.1 (Usability & adaptability)	Oppose	<p>The proposed addition of subclauses (a)(iv)-(vi) is opposed on the basis that such requirements do not reflect the operational and functional requirements of activities and buildings within the CCMUZ.</p> <p>If such requirements are intended to apply only to new residential developments, then the policy should be drafted to make this explicit (as is the case with policy 15.2.8.2 or clause vi. for example).</p>	<p>Delete subclauses (a)(iv)-(vi) of the policy as follows:</p> <p><i>a. Encourage a built form where the usability and adaptability of sites and buildings are enhanced by:</i></p> <p><i>iv. providing dedicated pedestrian access for each activity within a development, directly accessed from the street or other publicly accessible space;</i></p> <p><i>v. providing sufficient setbacks and glazing at the street frontage; and</i></p> <p><i>vi. where residential activity is located at the ground floor, ensuring the design of development contributes to the activation of the street and other public spaces.</i></p>
14.	Policy 15.2.8.2 (Amenity & effects)	Support with amendment	<p>With the exception of subclauses (a)(iv) and (vi) and the addition of the word 'including' in the prefacing text, the policy is generally supported.</p> <p>Subclause (a)(v) is opposed on the basis that: 'locating outdoor service space and car parking away from street frontages and entrances to buildings' may not always be</p>	Delete subclauses (a)(v) and (viii) of the policy.

No.	Provision	Position	Submission	Relief Sought
			<p>practicable or desirable and may establish a policy barrier to activities in such cases.</p> <p>Subclause (a)(viii) is opposed on the basis that urban design assessments impose unnecessary time, cost, and uncertainty for developments and built form standards provide a preferable method for managing development and providing certainty to all parties.</p> <p>The proposed amendments are otherwise unnecessary and inappropriate, for the purposes of promoting intensification.</p> <p>Accordingly, the proposed additions to the policy should be deleted.</p>	

Chapter 15 – Commercial Central City Zone Provisions:				
1.	Rule 15.11.1.1 P13 (CCZ residential activity)	Oppose	Proposed changes to clauses (e) and (f) regarding minimum outdoor living space requirements and new clauses (h) and (i) regarding outlook space are opposed. Such rules amount to greater regulatory constraint on residential development and are therefore not enabling of intensification. Accordingly, such changes should be deleted.	Delete.
2.	Rule 15.5.1.3 RD1 (LCZ- RDA consent requirements)	Oppose	For the reasons set out above in respect of Rule P21, the amendments to rule RD1 (which specify a requirement for consent for a breach of the proposed additional rules in P21) are also opposed. As stated above, such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty. Accordingly, these amendments should be deleted.	Retain the status quo in respect of Rule 15.5.1.3 RD1.
3.	Rule 15.5.2.2	Support	The proposed amendments to this rule support the purpose of PC14 in respect of intensification and are supported.	Retain the amendments as proposed.

	(LCZ- Building height)			
4.	Rule 15.5.2.5 (LCZ- Height in relation to boundary)	Support	The proposed amendments to this rule support the purpose of PC14 in respect of intensification and are supported.	Retain the amendments as proposed.
Chapter 15 – Commercial Central City Zone Provisions:				
1.	Rule 15.11.1.1 P13 (CCZ residential activity)	Oppose	Proposed changes to clauses (e) and (f) regarding minimum outdoor living space requirements and new clauses (h) and (i) regarding outlook space are opposed. Such rules amount to greater regulatory constraint on residential development and are therefore not enabling of intensification. Accordingly, such changes should be deleted.	Delete.
2.	Rule 15.11.1.2 C1 Controlled activities	Oppose in part	The submitter supports certification as a method and considers its application should not be limited to buildings 28m or less in height, or those compliant with rules 15.11.2.3 (sunlight and outlook for the street) or 15.11.2.12 (road wall height), given that such buildings will trigger restricted discretionary activity status in respect of those rules and provide Council with discretion to consider the corresponding	Amend Rule 15.11.1.2 C1 as follows: <i>a. Any new building, external alteration to any existing building, or the use of any part of a site not occupied by a building, for an activity listed in Rule 15.101.1.1 P1 to P17, which is:</i> <i>i. within the Central City Core area <u>28m or less in height; and</u></i> <i>ii. visible from a publicly owned and accessible space; and</i>

			assessment matters. To the extent that the urban design outcomes are otherwise achieved, this can still be assessed and certified by an independent urban design expert.	<p>iii. meets the following built form standards:</p> <p>A. Rule 15.11.2.3 Sunlight and outlook for the street; and/or</p> <p>B. Rule 15.11.2.12 Maximum road wall height;</p> <p>iv. iii. is certified by a qualified expert on a Council approved list as meeting each of the urban design provisions/ outcomes...</p>
3.	<p>Rule 15.11.1.3 RD5</p> <p>(CCZ- RDA consent requirement)</p>	Oppose	<p>For the reasons set out below in respect of the corresponding built form standards that are proposed, the amendments to rule RD5 are also opposed, noting these specify a requirement for consent for a breach of the following new rules:</p> <ul style="list-style-type: none"> A. Maximum building height B. Upper floor setbacks C. Tower dimension, site coverage and separation D. Wind <p>As stated below, such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	<p>Retain the status quo in respect of Rule 15.11.1.3 RD5.</p>

4.	Rule 15.11.1.3 RD11 (CCZ- RDA consent requirement)	Oppose	For the reasons set out below in further detail in respect of the building height built form standard (Rule 15.11.2.11 Building Height), this rule is opposed and should be deleted.	Delete.
5.	Rule 15.11.1.4 D1 (CCZ- DA consent requirement)	Oppose	Retaining discretionary status for a breach of building height and road wall height is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted. Building height and road wall height should be provided for as a permitted activity noting the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1).	Delete Rule 15.11.1.4 D1 in its entirety.
6.	Rule 15.11.2.3 Sunlight and outlook for the street	Support	The proposed amendments to this rule support the purpose of PC14 in respect of intensification and are supported.	Adopt.
7.	Rule 15.11.2.9 Sunlight and outlook at the boundary with a	Support	The proposed amendments to this rule support the purpose of PC14 in respect of intensification and are supported.	Adopt.

	residential zone			
8.	Rule 15.11.2.11 Building Height	Oppose	<p>The height limits in this rule are opposed in their entirety by the submitter.</p> <p>Among other reasons:</p> <ul style="list-style-type: none"> • The rules are fundamentally inconsistent with the requirements in policy 3 of the NPS-UD to '<i>enable... building heights and density of built form to realise as much development capacity as possible, to maximise benefits of intensification</i>'. Policy 3 was drafted specifically for New Zealand's Tier 1 cities – all of which feature heritage sites and buildings – indicating such built form is envisaged alongside these features. • The variable height limits for different parts of the city are arbitrary, inconsistent and inequitable. • To the extent that variable height limits are proposed in response to heritage values/features, this incorrectly assumes that building height and high density built form is inherently incompatible with heritage values. Such a conclusion is at odds with the evidence of successful intensive inner city development in international cities alongside heritage 	Delete rule 15.11.2.11 in its entirety.

			<p>features of considerably greater significance. Vibrant central cities (as sought by objectives in chapters 3 and 15) inherently feature heritage items alongside substantial modern buildings, and to rely on heritage features as a basis for limiting built form and height is narrow-minded, conservative and myopic.</p> <ul style="list-style-type: none"> • The heritage interfaces (and associated provisions) are generally opposed for the reasons stated in the covering submission. Among other things, it is noted that the heritage provisions in subchapter 9.3 provide for the management of buildings within heritage settings or alterations to heritage items. Accordingly, there is no need to separately constrain building height alongside or within heritage settings. • The height limits fail to adequately account for planned development currently progressing in parts of the City Centre Zone where lower heights are proposed. This includes the Catholic Cathedral Precinct (which includes the sites with road boundaries on the north side of Armagh Street at 129, 131, 133, 137 and 143 Armagh Street) and the Cathedral Square Height Precinct, where significant development proposals 	
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			<p>currently being planned entail buildings of a greater height than the proposed rules permit.</p> <ul style="list-style-type: none"> The design of tall buildings is otherwise managed by way of the control/discretion afforded by the urban design rule (C1 and RD1). <p>Accounting for the points above and given that the proposed constraints on building heights are not necessary or appropriate for the purposes of promoting intensification, they should be deleted, such that no maximum height limit applies throughout the City Centre Zone.</p>	
9.	<p>Rule 15.11.2.12</p> <p>(CCZ – road wall height)</p>	Oppose	<p>Retaining a maximum road wall height rule is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.</p> <p>Road wall heights should be unconstrained and provided for as a permitted activity noting the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1).</p>	Delete Rule 15.11.2.12 in its entirety.
10.	<p>Rule 15.11.2.14</p> <p>(CCZ – building)</p>	Oppose	<p>Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of</p>	Delete Rule 15.11.2.14 in its entirety.

	tower setbacks)		<p>PC14 and accordingly this rule should be deleted.</p> <p>To the extent that such matters warrant consideration through a consenting framework, the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1) is considered sufficient to address this matter.</p>	
11.	<p>Rule 15.11.2.15</p> <p>(CCZ – max tower dimension and upper floor site coverage)</p>	Oppose	<p>Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.</p> <p>To the extent that such matters warrant consideration through a consenting framework, the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1) is considered sufficient to address this matter.</p>	Delete Rule 15.11.2.15 in its entirety.
12.	<p>Rule 15.11.2.16</p> <p>(CCZ – building tower separation)</p>	Oppose	<p>Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.</p>	Delete Rule 15.11.2.16 in its entirety.

			To the extent that such matters warrant consideration through a consenting framework, the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1) is considered sufficient to address this matter.	
13.	Rule 15.11.2.17 (CCZ – Wind)	Oppose	<p>Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.</p> <p>As set out in other submission points, controls on wind generation are opposed due to the difficulties of evaluating such effects with certainty and the practical limitations on obtaining such assessments. Moreover, changes to wind generation and the pedestrian environment are a necessary tradeoff contemplated by the NPS-UD, insofar as it directs maximum intensification of central city environments.</p> <p>The proposed rule is otherwise unnecessary and inappropriate for the purposes of promoting intensification and should be deleted.</p>	Delete Rule 15.11.2.17 in its entirety.
Chapter 15 – Commercial Central City Mixed Use Zone Provisions:				

1.	<p>Rule 15.12.1.1 P16</p> <p>(CCMUZ residential activity)</p>	Oppose	<p>The proposed amendments introduce additional design standards (re: street setback, glazing and outlook space requirements).</p> <p>Such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	Retain the status quo in respect of Rule 15.12.1.1 P16.
2.	<p>Rule 15.12.1.2 C1</p> <p>(CCMUZ - Catholic Cathedral)</p>	Support, with amendment	<p>Amend the rule to include reference to both the Barbadoes Street Site and the Manchester Street Site, noting that part of the Barbadoes Street Site is already included in this Rule.</p> <p>The rule enables flexibility of the built form, appropriate for the potential redevelopment of one of these sites to establish a new Catholic Cathedral.</p>	Amend Rule 15.12.1.2 C1 to include the whole of the Barbadoes Street Site, and the Manchester Street Site.
3.	<p>Rule 15.12.1.3 RD2</p> <p>(CCMUZ-RDA consent requirement)</p>	Oppose	<p>The changes proposed to this rule are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p>	Retain the status quo in respect of Rule 15.12.1.3 RD5.

			Accordingly, these amendments should be deleted.	
4.	Rule 15.12.1.3 RD4 (CCMUZ- RDA consent requirement)	Oppose	<p>This new rule and its requirement for consent for residential developments within the CCMUZ is not necessary or appropriate for the purposes of promoting intensification and will impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	Delete.
5.	Rule 15.12.1.3 RD5 (CCMUZ- RDA consent requirement)	Oppose	<p>This new rule and its requirement for consent for buildings exceeding 17m height within the CCMUZ is not necessary or appropriate for the purposes of promoting intensification and will impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	Delete.
6.	Rule 15.12.1.3 RD6 (CCMUZ- RDA consent requirement)	Oppose	<p>This new rule and its requirement for consent is not necessary or appropriate for the purposes of promoting intensification and will impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p>	Delete.

			Accordingly, these amendments should be deleted.	
7.	Advice note (at the end of 15.12.1.3)	Oppose	The advice note concerns residential heritage areas. For reasons stated in submissions specifically on residential heritage areas, this advice note is opposed.	Delete.
8.	Rule 15.12.2.1 (CCMUZ – Landscaping & trees)	Oppose in part	<p>Proposed clause (a)(iv) increases landscaping requirements from 5% of the site area to 10%.</p> <p>This change is not necessary or appropriate for the purposes of promoting intensification and will in fact be counter to intensification by diminishing the area of the site available for built form/development. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Retain the status quo in clause (a)(iv) – i.e. 5% rather than 10% site landscaping.
9.	Rule 15.12.2.2 (CCMUZ – building height)	Oppose	The variable building heights and maximum building base heights are inadequate and inappropriate for a commercial zone within the central city, accounting for Policy 3(a) and Policy 3 (c) of the NPS-UD directs that development of up to six stories is to be 'enabled' as a minimum.	<p>Amend as follows:</p> <p>15.12.2.2 Maximum building height</p> <p><u><i>a. The maximum height of any building shall be 32 metres.</i></u></p> <p><i>b. The maximum height of any building shall be in accordance with the height specified Unless identified on the Central City Maximum Building Height</i></p>

			Accounting for this, the submitter seeks that the rule provide for a permitted maximum building height of at least 32m.	<p>planning map the maximum height of any building shall be 32 metres.</p> <p>b. The maximum height of any building base shall be 17 metres.</p> <p>€ b. Any application arising from this rule shall not be limited or publicly notified</p>
10.	Rule 15.12.2.9 (CCMUZ – Minimum number of floors)	Oppose	<p>A prescriptive requirement for a minimum number of floors is opposed on the basis that this is not 'enabling' of development or responsive to the functional or operational needs of activities and commercial/market imperatives determining their optimal location.</p> <p>Accordingly, the proposed new rule requirement for a minimum of 3 floors is opposed.</p> <p>This change is not necessary or appropriate for the purposes of enabling intensification and will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Delete Rule 15.12.2.9 in its entirety.
11.	Rule 15.12.2.10	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the	Delete Rule 15.12.2.10 in its entirety.

	(CCMUZ – building setbacks)		realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	
12.	Rule 15.12.2.11 (CCMUZ – building tower coverage)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	Delete Rule 15.12.2.11 in its entirety.
13.	Rule 15.12.2.12 (CCMUZ – glazing)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	Delete Rule 15.12.2.12 in its entirety.
Chapter 15 – Commercial Central City (South Frame) Mixed Use Zone Provisions:				
1.	Rule 15.13.1.1 P3 (CC(SF)MUZ commercial services & offices)	Support in part	Given the central location of that part of this zone which is outside the Health and Innovation Precincts and that intensification of such land is likely to be realised by way of office development, the limitations in clause (a)(ii) of this rule limiting the total quantum of office activity are considered	Delete activity standard (a) from Rule 15.13.1.1 P3, as follows: <i>a. Outside the Health Precinct and/or the Innovation Precinct:</i> <i>i. Where office activities or commercial services are proposed on a site, individual tenancies shall not exceed 450m² of GLFA; and</i>

			<p>inappropriate and counter to the purpose of PC14.</p> <p>Retention of clause (a)(i) of the rule would ensure that any demand for large floor plate offices or larger office tenants is satisfied within the CCB zone.</p> <p>Enabling smaller office tenancies to establish within the CC(SF)MUZ would support, and not otherwise compromise, the intended role of the CCB zone.</p> <p>Noting the above, clause (a)(ii) of this rule should be deleted.</p>	<p>ii. The total area used for office activities and/or commercial services shall not exceed 450m² of GLFA per site, or 450m² of GLFA per 500m² of land area; whichever is greater. This limit may be exceeded where office activities and/or commercial services form part of a mixed-use development comprising residential activities, in which case the office activities and commercial services collectively shall not exceed 50% of the GLFA of the overall development.</p>
2.	<p>Rule 15.13.1.1 P13</p> <p>(CC(SF)MUZ residential activity)</p>	Oppose	<p>The proposed amendments now require 20m² (rather than 10m²) of outdoor living space for residential units with a ground floor habitable space and otherwise introduce additional design standards (re: glazing and outlook space requirements).</p> <p>Such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	<p>Retain the status quo in respect of Rule 15.13.1.1 P13.</p>

3.	<p>Rule 15.13.1.3 RD5</p> <p>(CCMUZ-RDA consent requirement)</p>	Oppose	<p>For the reasons set out below in respect of the corresponding built form standards that are proposed, the amendments to rule RD2 are also opposed, noting these specify a requirement for consent for a breach of the following new rules:</p> <ul style="list-style-type: none"> A. Maximum building height B. Minimum number of floors C. Upper floor setbacks, tower dimension and site coverage D. Glazing <p>As stated below, such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	<p>Delete proposed new clauses (j)-(m) in Rule 15.13.1.3 RD5.</p>
4.	<p>Rule 15.13.2.1</p> <p>(CC(SF)MUZ – height)</p>	Oppose	<p>The variable building heights and maximum building base heights are inadequate and inappropriate for a commercial zone within the central city, accounting for Policy 3(a) and Policy 3 (c) of the NPS-UD directs that development of up to six stories is to be 'enabled' as a minimum.</p>	<p>Delete rule 15.13.2.1 as proposed and replace with the following:</p> <p><i>15.13.2.1 Building height</i></p> <p><i><u>a. The maximum height of any building shall be 32 metres.</u></i></p>

			Accounting for this, the submitter seeks that the rule provide for a permitted maximum building height of at least 32m.	<u><i>b. Any application arising from this rule shall not be limited or publicly notified.</i></u>
5.	Rule 15.13.2.8 (CC(SF)MUZ – minimum number of floors)	Oppose	<p>The requirement for a minimum of 3, rather than 2 floors does not reflect the functional or operational requirements of many permitted activities that are expected to establish with the zone.</p> <p>This change is not otherwise necessary or appropriate for the purposes of promoting intensification and will in fact be counter to intensification by limiting more efficient forms of development based on a 3m ground floor height. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Retain the status quo in respect of Rule 15.13.2.10.
6.	Rule 15.13.2.10 (CC(SF)MUZ – building tower setbacks)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	Delete Rule 15.12.2.10 in its entirety.
7.	Rule 15.13.2.11	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may	Delete Rule 15.12.2.11 in its entirety.

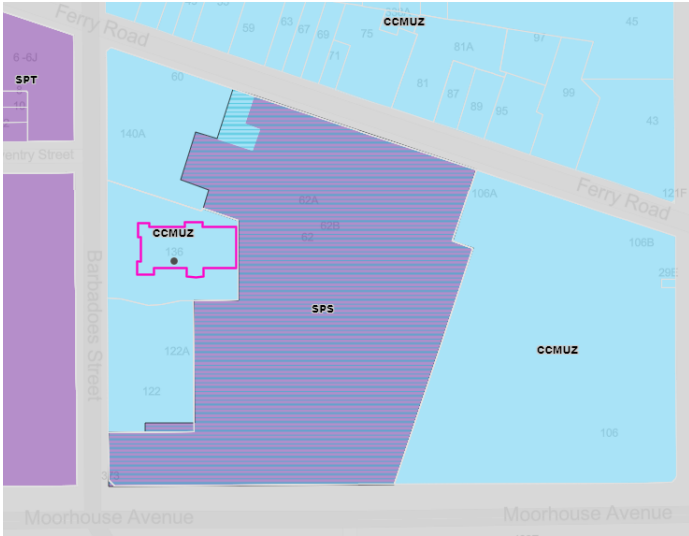
	(CC(SF)MUZ – building tower site coverage)		not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	
8.	Rule 15.13.2.12 (CC(SF)MUZ – glazing)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	Delete Rule 15.12.2.12 in its entirety.
Chapter 15 – Commercial Zones- Matters of Discretion				
1.	Rule 15.14.3.1 (Matters of discretion- building height)	Oppose	<p>The proposed new matters of discretion in clause (b) for applications exceeding the permitted maximum building height are:</p> <ul style="list-style-type: none"> a. Unnecessary, insofar that they introduce matters that are otherwise within the scope of the operative matters . b. Unclear and uncertain. c. Excessively broad in scope. <p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or appropriate for the purposes of promoting</p>	Retain the status quo in respect of Rule 15.14.3.1 (and delete the proposed assessment matters in clause (b) in their entirety).


			<p>intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	
2.	<p>Rule 15.14.3.35</p> <p>(Matters of discretion- upper floor setbacks, tower dimension and coverage)</p>	Oppose	<p>The proposed new matters of discretion relate to rules that are otherwise opposed, and as such these should be deleted.</p> <p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or appropriate for the purposes of promoting intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Delete Rule 15.14.3.35 in its entirety.
3.	<p>Rule 15.14.3.36</p> <p>(Matters of discretion- Tower Roof Modulation)</p>	Oppose	<p>The proposed new matters of discretion in this rule are unnecessary, insofar that they introduce matters that are otherwise within the scope of the operative matters in Rule 15.14.3.1 clause (a).</p> <p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or appropriate for the purposes of promoting intensification. The rule change will also</p>	Delete Rule 15.14.3.36 in its entirety.

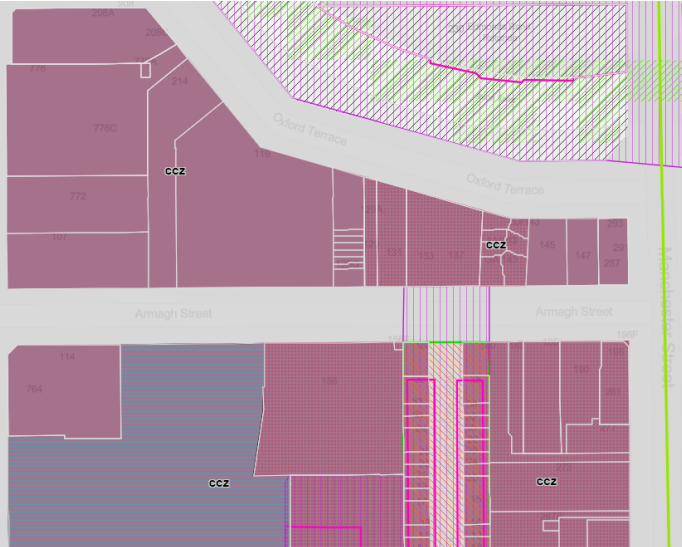
			<p>impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	
4.	<p>Rule 15.14.3.37</p> <p>(Matters of discretion- Glazing</p>	Oppose	<p>The proposed new matters of discretion relate to rules that are otherwise opposed, and as such these should be deleted.</p> <p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or appropriate for the purposes of promoting intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Delete Rule 15.14.3.37 in its entirety.
5.	<p>Rule 15.14.3.38</p> <p>(Matters of discretion- outlook space)</p>	Oppose	<p>These changes are not necessary or appropriate for the purposes of promoting intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Delete Rule 15.14.3.38 in its entirety.

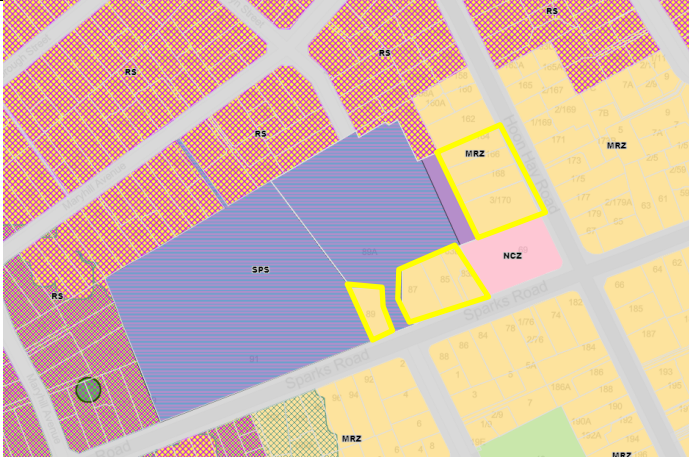
6.	Rule 15.14.3.39 (Matters of discretion-Wind	Oppose	<p>The proposed new matters of discretion relate to rules that are otherwise opposed, and as such these should be deleted.</p> <p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or appropriate for the purposes of promoting intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Delete Rule 15.14.3.39 in its entirety.
7.	Rule 15.14.5.2 (Matters of discretion-Buildings at 136 Barbadoes Street)	Support in part	Amend rule title as necessary given the above submission point.	Retain as notified, noting some consequential amendments might be required to the rule title given other submission points sought.
8.	Chapter 15 City Centre Zone Controlled Activities	Oppose in part	As the Armagh Street Site is a potential site for a new Catholic cathedral, flexibility is sought on this site similar to Rule 15.12.1.2 C1 in the CCMUZ.	Insert an equivalent Rule 15.12.1.2 C1 in the City Centre Zone, for the Armagh Street Site.

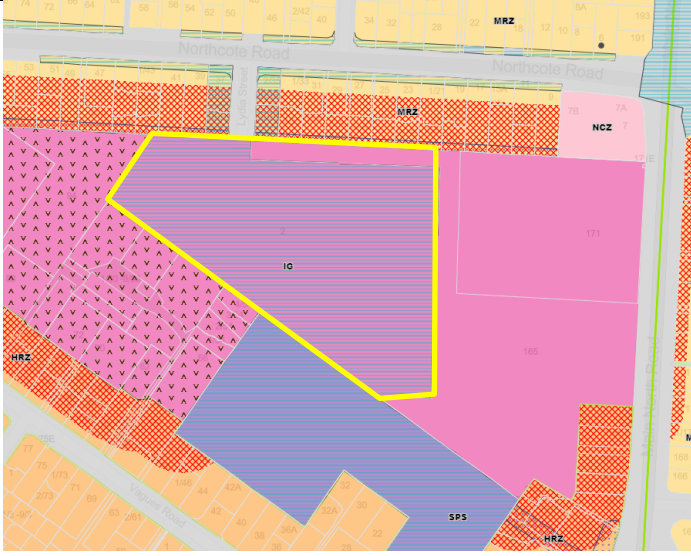
9.	Chapter 15 City Centre Zone Matters of Control	Oppose in part	As the Armagh Street Site is a potential site for a new Catholic Diocese cathedral, flexibility is sought on this site similar to Rule 15.14.5.2 in the CCMUZ.	Insert an equivalent section 15.14.5.2 in the City Centre Zone, for buildings at the Armagh Street Site.
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No.	Provision	Position	Submission	Relief Sought
Planning Maps / Rezoning				
1.	Planning maps	Support	<p>The zoning of the land at 136 Barbadoes Street is supported.</p> <p>However, given PC13 proposes to remove the heritage listing for the Cathedral, it is no longer appropriate for any of the planning maps to show a heritage item on the site. The Diocese therefore seek that the heritage listing shown at 136 Barbadoes Street is removed from the electronic planning map.</p>	<p>Retain the SPS and CCMUZ zoning of the land at 136 Barbadoes Street (identified below), but delete the heritage listing/outline from the planning maps.</p> 

No.	Provision	Position	Submission	Relief Sought
2.	Planning maps	Support	The zoning of the land at 373-375 Manchester Street is supported.	<p>Retain the SPS zoning of the land at 373-375 Manchester Street (identified below.</p> 
3.	Planning maps	Support in part	<p>For the reasons expressed in the submission above, the submitter supports the zoning of the land bounded by Oxford Terrace, Manchester Street, Armagh Street, and Colombo Street, but opposes a number of overlays applying to the land or adjacent land.</p> <p>Specifically, the submitter:</p> <ol style="list-style-type: none"> Opposes the extent of the heritage setting for New Regent Street (being 	<p>Amend the planning maps applying to the land bounded by Oxford Terrace, Manchester Street, Armagh Street, and Colombo Street, as follows::</p> <ol style="list-style-type: none"> Delete the extent of the heritage setting for New Regent Street (being heritage setting 336 associated with heritage item 404 in Appendix 9.3.7.2 schedule), so that it ends at the southern most edge of Armagh Street, being where New Regent Street meets Armagh Street.

No.	Provision	Position	Submission	Relief Sought
			<p>heritage setting 336 associated with heritage item 404 in Appendix 9.3.7.2 schedule) and considers the setting should end at the southern most edge of Armagh Street, being where New Regent Street meets Armagh Street.</p> <p>b. Opposes the Central City Heritage Interface overlay, where this applies to the to the site.</p>	<p>b. Delete the Central City Heritage Interface overlay.</p> 
4.	Planning maps	Support in part	<p>The Diocese has interests in land adjoining Our Lady of the Assumption school in Sparks Road, Hoon Hay. That school is subject to SPS zoning, but the adjacent land is zoned MRZ which limits the scope to establish school-related activity over these sites. Accounting for this, the Diocese seeks SPS zoning of the land.</p>	<p>Amend the planning maps by rezoning the land identified below as SPS (with a consequential change to Appendix 13.6.6.2 made, to identify an underlying zoning of MRZ):</p>

No.	Provision	Position	Submission	Relief Sought
				
5.	Planning maps	Support in part	<p>The Diocese has interests in land in and adjoining Lydia Street, Redwood. The majority of this land is being developed for the new Marian School campus, in accordance with a designation that applies to the land.</p> <p>However, the land remains subject to an IG zone under PC14, with this zoning reflecting the former use of the land. Due to the IG zoning, an Industrial Interface qualifying matter applies to the adjacent residential land on Lydia Street and Northcote Road.</p> <p>The Diocese consider that a Brownfield Precinct overlay should be applied to the land to recognise the attributes of the land</p>	<p>Amend the planning maps to identify a Brownfield Precinct overlay, over the IG zoned school site; and delete the Industrial Interface overlay for those properties with frontage to Northcote Road or Lydia Street.</p>

No.	Provision	Position	Submission	Relief Sought
			<p>and that any use of surplus school land may be appropriate for residential development.</p> <p>The Diocese also questions the appropriateness of the Industrial Interface overlay applying to those sites along Lydia Street and Northcote Road, given that they will be adjoining a school and supermarket (both under development) rather than industrial activities which the interface overlay is intended to address.</p>	

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date: 16/05/2023

First name: Jo **Last name:** Appleyard

Organisation: Carter Group Limited

On behalf of: Carter Group Limited

Preferred method of contact Email

Attached Documents

Name
PC13 Submission - Carter Group Limited 3443-8088-7587

Form 5**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR
PLAN, CHANGE OR VARIATION***Clause 6 of Schedule 1, Resource Management Act 1991***To** Christchurch City CouncilName of submitter: Carter Group Property Limited (*Carter Group*)

- 1 This is a submission on the proposed Heritage Plan Change 13 (*PC13*) to the Christchurch District Plan (the *District Plan*).
- 2 Carter Group could not gain an advantage in trade competition through this submission.
- 3 Carter Group's submission relates to the whole of PC13. The specific relief sought by Carter Group is set out at **Appendix 1** and elaborated on below.
- 4 Carter Group wishes to be heard in support of the submission.
- 5 If others make a similar submission, Carter Group will consider presenting a joint case with them at a hearing.

STRATEGIC OBJECTIVES

- 6 Carter Group generally opposes PC13 to the extent that it is inconsistent with Strategic Objectives 3.3.1 and 3.3.2 of the District Plan. Carter Group seek that the provisions of PC13 are made consistent with those Strategic Objectives.

CARTER GROUP SITES WITH HERITAGE INTERESTS

- 7 Carter Group owns land at 32 Armagh Street, known as the former Girls High Site (the *Site*). That land is partly covered by a heritage setting (heritage setting number 287) and includes a heritage item (the 'Blue Cottage' – heritage item number 390). The extent of the Site, and the heritage setting and item are shown below:



Figure 1: Site shown in yellow, approximate location of heritage setting shown in orange, and item location indicated by a red cross.

- 8 The District Plan statement of significance for the building notes, among other things, its historical significance as a c.1875 colonial cottage and its architectural significance due to the 'authenticity of its exterior and retention of some of its original interior detailing'. However, the building is in a poor state of repair with evident damage to its exterior and, as noted in the statement of significance, has had original architectural features removed over time. The heritage setting for the building is of no apparent significance in its own right – constituting a gravelled car park.
- 9 Accounting for these attributes, the building and setting are considered to be of little to no heritage value.
- 10 The scope of PC13 is broad and presents a timely opportunity to review the extent of the schedule of heritage items. Such a review is especially relevant in instances where additional information on individual items has become available following the

District Plan Review. The provision of such information is integral to the need to carefully weigh costs and benefits of any proposed regulation (such as scheduling) under s 32 RMA.

- 11 For the reasons described above, the Blue Cottage's heritage status is considerably diminished and can no longer be considered significant. This building and its setting should no longer be included on the Schedule.

- 12 Carter Group therefore seeks that:

- 12.1 The Blue Cottage (Heritage Item 390) be removed from the Schedule of Significant Historic Heritage in Appendix 9.3.7.2 of the District Plan; and

- 12.2 Associated Heritage Setting 287 be removed from the same.

The proposed residential heritage areas

- 13 PC13 introduces 11 new heritage areas into the District Plan, with associated objectives, policies and rules.
- 14 Carter Group hold significant concerns over the introduction of these heritage areas in general. The Site is located in the "Inner City West HA6" residential heritage area. As is clear from the figure above, the majority of the Site (and we would argue a large proportion of the heritage area itself) holds no heritage values whatsoever. It is therefore perplexing why these areas have been identified in this new overlay.
- 15 Carter Group further note that the Heritage Report and Site Record Forms for 'HA6 Inner City West' prepared by Dr Ann McEwan (Appendix 12 to the section 32 report) records the 32 Armagh Street as a vacant lot with its contribution to the heritage area being 'intrusive'. The Blue Cottage is recorded as being located on 325 Montreal Street with its contribution to the heritage area being 'defining'. However, the proposed contributions map (proposed Appendix 9.3.7.8) identifies the whole site, including the vacant lot on 32 Armagh Street, as having a 'defining' contribution. This is wrong and inconsistent with the report prepared by Dr Ann McEwan.
- 16 Carter Group also question the identified contribution of other sites within the "Inner City West HA6" residential heritage area, as the basis for then justifying the identification of a residential heritage area. By way of example, the YMCA Christchurch site occupies a substantial area and is assessed as making a 'defining' contribution to the proposed "Inner City West HA6" residential heritage area, despite featuring modern and partially-constructed multi-level commercial buildings of no apparent heritage merit. Other sites within the heritage area are also of questionable merit in terms of their contribution.

- 17 Carter Group are concerned about these errors, and the risk that errors such as these might be systemic throughout PC13. Given the strict regulations on development PC13 proposes, it is essential to ensure the provisions are accurate and justified. The heritage listings and corresponding rules within the District Plan currently recognise and provide for the protection of historic heritage from inappropriate subdivision, use and development.
- 18 A number of the proposed heritage areas overlap with character areas already identified in the District Plan. It is not entirely clear why both of these overlays are required to protect historic heritage. The addition of a residential heritage area overlay will add unnecessary complexity and duplication in the interpretation of the District Plan.
- 19 Carter Group note that through the hearings on the proposed Christchurch District Plan, the Independent Hearings Panel determined that there was no basis to retain rules controlling development on sites adjacent to heritage items or settings in order to satisfy section 6(f) of the RMA. For the same reasons, it follows that the proposed provisions for Residential Heritage Areas, and the related 'Interface Sites' is not warranted.
- 20 The Site's identification within a heritage area is strongly opposed by the Carter Group, who seek that:
 - 20.1 the heritage areas in general (maps and associated provisions) are removed from PC13; or
 - 20.2 the proposed "Inner City West HA6" residential heritage area is removed from PC13; or
 - 20.3 at the very least, the Site be removed from the proposed "Inner City West HA6" residential heritage area.

The New Regent Street heritage setting

- 21 Carter Group oppose the extent of the heritage setting for New Regent Street (being heritage setting 336 associated with heritage item 404 in Appendix 9.3.7.2 schedule).
- 22 Carter Group oppose the identification of this heritage setting to the northern most edge of Armagh Street and consider the setting should end at the southern most edge of Armagh Street, being where New Regent Street meets Armagh Street. Among other reasons, Carter Group consider that the modern buildings fronting Armagh Street at either end of New Regent Street or the Armagh Street road reserve have no apparent heritage values that warrant a heritage setting.

- 23 There is no basis for why this heritage setting extends as far as it does.

Central City Heritage Interface

- 24 Carter Group have interests in the land bounded by Oxford Terrace, Manchester Street, Armagh Street, and Colombo Street as shown below:



Figure 2: Approximate outline of site in yellow

- 25 Part of this site is subject to the proposed 'Central City Heritage Interface' overlay. This overlay is strongly opposed by the Carter Group. Carter Group considers there is no basis or justification for such an overlay over the Site. Among other reasons, Carter Group notes that the site has no identified heritage values and is surrounded by roads, that provide an adequate interface to and separation from other sites in the area, including those which may have heritage value.
- 26 It is also unclear why there are no objectives or policies introduced by PC13 in respect of these heritage interface sites. This gives very little direction to plan users as to their utility and/or relevance.
- 27 On this basis, Carter Group therefore seek:
- 27.1 the heritage interface overlays in general (maps and any associated provisions) are removed from PC13; or

27.2 the Central City Heritage Interface relating to New Regent Street is removed;
or

27.3 at the very least, the Central City Heritage Interface is removed from the
above site.

Signed for and on behalf of Carter Group Limited by its solicitors and authorised agents
Chapman Tripp



Jo Appleyard
Partner
12 May 2023

Address for service of submitter:

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APPENDIX 1

No.	Provision	Position	Submission	Relief Sought
1	Definition of 'Alteration'	Oppose	The definition has the effect of meaning that any change, modification or addition to a heritage item, heritage setting or heritage fabric, or a building in a heritage area will constitute an 'alteration' and trigger corresponding rules and consent requirements, irrespective of whether it impacts on heritage fabric. This will create unnecessary, costly and inefficient consent requirements, and provide no benefits in respective of heritage.	Retain status quo.
2	Definition of 'Contributory building'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Regardless, the proposed definition is vague and provides little certainty as to whether buildings would or would not constitute a contributory building.	Delete.
3	Definition of 'Defining building'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Regardless, the proposed definition is vague and provides little certainty as to whether buildings would or would not constitute a defining building.	Delete.

No.	Provision	Position	Submission	Relief Sought
4	Definition of 'Demolition'	Oppose	The amended definition has the effect of meaning that any destruction of a non-substantial part of a building constitutes 'demolition' and triggers corresponding rules and consent requirements. This will create unnecessary, costly and inefficient consent requirements for inconsequential partial demolition work, create conflict with the definition of 'alteration', and provide no benefits in respect of heritage.	Retain status quo.
5	Definition of 'Heritage setting'	Oppose	The amended definition removes the wording that a setting <i>'together with the associated heritage item, has met the significance threshold'</i> and instead states that <i>'Heritage settings have not been assessed as meeting the significance threshold for scheduling'</i> . The submitter considers that heritage settings that do not meet the significance threshold for scheduling should not be listed, with associated regulatory requirements.	Retain status quo.
6	Definition of 'Heritage Building Code works'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for insulation and glazing upgrades.	Retain as proposed.
7	Definition of 'Intrusive building or site'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.	Delete.

No.	Provision	Position	Submission	Relief Sought
			Regardless, the proposed definition is vague and provides little certainty as to whether buildings or sites would or would not be intrusive.	
8	Definition of 'Neutral building or site'	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.</p> <p>Regardless, the proposed definition is vague and provides little certainty as to whether buildings or sites would or would not be categorised as neutral.</p>	Delete.
9	Definition of 'Reconstruction'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for additional forms of reconstruction.	Retain as proposed.
10	Definition of 'Relocation'	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. As such, the submitter opposes the definition of relocation insofar that it relates to heritage areas.</p> <p>Further, the submitter opposes the deletion of the exclusions in (a) and (b) that otherwise sensibly exclude temporary relocation or realignment works.</p>	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
11	Definition of 'Repairs'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for additional forms of repairs.	Retain as proposed.
12	Definition of 'Restoration'	Supports	The amended definition provides greater clarity and certainty.	Retain as proposed.
13	8.6.1 Minimum net site area	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.</p> <p>Further, the proposed 450m2 minimum net site area is opposed on the basis that it conflicts with the objectives in the NPS-UD and District Plan to provide for the most intensive and efficient scale and form of development within Central City areas.</p>	Delete.
14	8.9 Rules-Earthworks	Support	The amended provisions in rule 8.9 are generally appropriate.	Retain as proposed.
15	Policy 9.3.2.2.2 Identification, assessment and scheduling of heritage areas	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.	Delete.

No.	Provision	Position	Submission	Relief Sought
16	Policy 9.3.2.2.3 - Management of scheduled historic heritage	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.</p> <p>The amendments to clause (b) of this policy are also opposed. The operative wording within this policy sensibly recognises that Significant (Group 2) heritage items are potentially capable of accommodating a greater degree of change than Highly Significant (Group 1) heritage items.</p>	Retain status quo.
17	Policy 9.3.2.2.5 Ongoing use of scheduled historic heritage	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to this policy are opposed.	Retain status quo.
18	Policy 9.3.2.2.8- Demolition of scheduled historic heritage	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to clause (a) of this policy are opposed.</p> <p>In addition, the changes to clause (a)(ii) are opposed insofar that they introduce a new 'test' for evaluating the demolition of historic heritage that presents an unreasonable and inappropriate threshold that materially changes and undermines the policy. By way of example, the proposed wording may preclude the demolition of heritage items that are</p>	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
			significantly (physically) compromised, on the basis of one or more (non-physical) heritage values (e.g. historical/social or cultural/spiritual value) remaining.	
19	Rule 9.3.3 How to interpret and apply the rules	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to this rule, insofar that they relate to heritage areas are opposed.	Delete all references to heritage areas.
20	9.3.4 Rules- Historic heritage	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, changes to this rule, insofar as they relate to heritage areas are opposed.	Delete all references to heritage areas within rule 9.3.4, including (and in particular) rules RD6-RD8.
21	Matters of discretion 9.3.6.1(a)	Oppose	The submitter opposes the deletion of clause (a), given that damage incurred as a result of the Canterbury earthquakes of 2010 and 2011 including the costs of repair and reconstruction, remains a relevant matter for consideration.	Retain status quo for 9.3.6.1(a).
22	Matters of discretion 9.3.6.1(p)	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters under clause (p) are opposed.	Delete proposed 9.3.6.1(p).

No.	Provision	Position	Submission	Relief Sought
23	Matters of discretion 9.3.6.4	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters in rule 9.3.6.4 are opposed.	Delete proposed rule 9.3.6.4.
24	Matters of discretion 9.3.6.5	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters in rule 9.3.6.5 are opposed.	Delete proposed rule 9.3.6.5.
25	Matters of discretion 9.3.6.6	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters in rule 9.3.6.6 are opposed.	Delete proposed rule 9.3.6.6.
26	Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items	Oppose	For the reasons stated in the covering submission, the listing of the item and setting at 32 Armagh Street (and 325 Montreal Street) is inappropriate. Accordingly, this listing should be deleted.	Delete Heritage Item 390 and Heritage Setting 287 regarding 32 Armagh Street from Appendix 9.3.7.2.
27	Appendix 9.3.7.3	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
	Schedule of Significant Historic Heritage Areas		covering submission. Accordingly, the changes to this schedule are opposed.	
28	Appendix 9.3.7.4 Heritage item and heritage setting exemptions	Oppose	The exemptions provided in Appendix 9.3.7.4 are an important tool for incentivising the adaptive reuse and ongoing protection of heritage items. As such, the amendments proposed to this appendix which reduce the extent of exemptions is inconsistent with the Plan's objectives in relation to heritage and section 6 of the Act.	Retain the status quo.
29	Appendix 9.3.7.7 – Residential Heritage Areas - Aerial Maps	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Appendix 9.3.7.7 should be deleted.	Delete.
30	Appendix 9.3.7.8 – Residential Heritage Areas – Site Contributions Maps	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Appendix 9.3.7.8 should be deleted.	Delete.
31	Appendix 9.3.7.9 – Residential	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the	Delete.

No.	Provision	Position	Submission	Relief Sought
	Heritage Areas – Interface Sites and Character Area Overlay Maps		covering submission. Accordingly, Appendix 9.3.7.9 should be deleted.	
32	Rule 14.5.3.1.3 Area-specific restricted discretionary activities	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 14.5.3.1.3 should be deleted.	Delete.
33	Rule 14.5.3.2 Area-specific built form standards	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 14.5.3.2 should be deleted.	Delete.
34	Rule 15.11.1.3 Restricted discretionary activities	Oppose	<p>It is assumed that the reference to the “Central City Heritage Qualifying Matter and Precinct” is a reference to the ‘Central City Heritage Interface’ overlay shown on the planning maps, although this is not clear.</p> <p>The heritage interfaces (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 15.11.1.3 should be deleted.</p>	Delete.

No.	Provision	Position	Submission	Relief Sought
35	Rule 15.11.2.11 Building Height	Oppose	<p>It is assumed that the reference to the "Central City Heritage Qualifying Matter and Precinct" is a reference to the 'Central City Heritage Interface' overlay shown on the planning maps, although this is not clear.</p> <p>The heritage interfaces (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 15.11.2.11 should be deleted.</p>	Delete

Submitter Details

First name: Jo

Last name: Appleyard

Organisation: Church Property Trustees

On behalf of: Church Property Trustees

Preferred method of contact	Email
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Attached Documents

Name
PC14 Submission - Church Property Trustees 3457-4784-5667

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: Church Property Trustees (CPT)

- 1 This is a submission on the proposed Plan Change 14 (PC14) to the Christchurch District Plan (the *District Plan*).
- 2 CPT could not gain an advantage in trade competition through this submission.
- 3 CPT's submission relates to the whole of PC14. The specific relief sought by CPT is set out at **Appendix 1** and elaborated on below.
- 4 CPT wishes to be heard in support of the submission.
- 5 If others make a similar submission, CPT will consider presenting a joint case with them at a hearing.

The St James Church

- 6 CPT owns land at 65 Riccarton Road (the *Site*), this is held on behalf of the Anglican Diocese of Christchurch (the *Diocese*). The Site houses the St James Church (the *Church*). The Church is listed as a 'Highly Significant' heritage item (heritage item number 465), within a heritage setting (heritage setting number 220) in the District Plan:

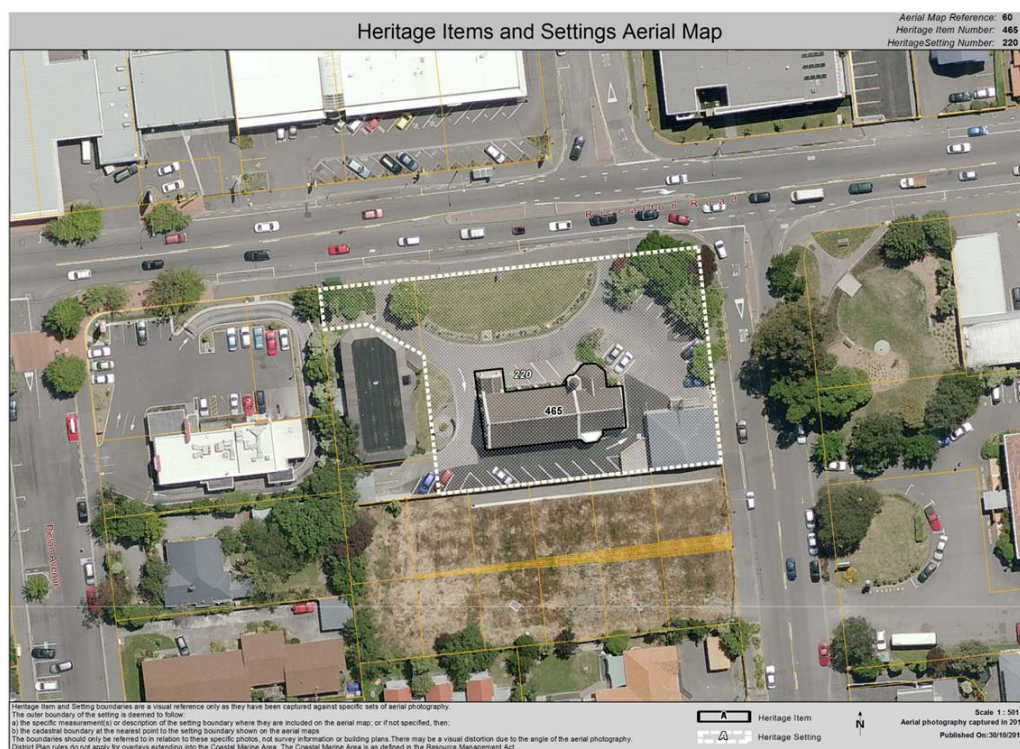


Figure 1: The heritage item and setting on the Site, Heritage Items and Settings Aerial Map, Appendix 9.3.7.7 Christchurch District Plan.

- 7 The Church was badly damaged during the Canterbury earthquakes and was listed as an Earthquake Prone Building having an NBS of less than 20% on 27 May 2019. The Church is currently in an extremely poor state of repair, and lacks the structural integrity required for its safe usage.
- 8 The Diocese continues to respond to changing demographics in the way it operates and the infrastructure required. In Christchurch this has included re-focussing the centres of operation for some parishes as a critical aspect of its core activities.
- 9 Notably, the Riccarton parish merged with the Spreydon parish a number of years ago. The Diocese therefore has no use for the Church, the Site itself is redundant and surplus to the Diocese's uses.
- 10 CPT hold a wide range of heritage assets throughout the City on behalf of the Diocese. It is one of the largest (if not the largest) private heritage owners in the South Island. Almost all of its heritage assets have been restored to better than pre-earthquake levels.
- 11 CPT have investigated in depth the feasibility of reinstating the Church, however, none of the options are economically viable for the Diocese. The Diocese has also investigated the sale of the Site to developers who might otherwise wish to reinstate the Church themselves. CPT's resounding feedback from these market enquiries was that purchasers were reluctant to take on the risk of an extremely low NBS building, and the uncertainty around future use and potential cost of repair.
- 12 CPT consider that the Church would be appropriate to demolish, having regard to the matters listed in Policy 9.3.2.2.8 which provides (as amended by PC14):

9.3.2.2.8 Policy – Demolition of scheduled historic heritage of heritage items

a. When considering the appropriateness of the demolition of a heritage item scheduled in Appendix 9.3.7.2 or a defining building or contributory building in a heritage area scheduled in Appendix 9.3.7.3, have regard to the following matters:

i. whether there is a threat to life and/or property for which interim protection measures would not remove that threat;

ii. whether the extent of the work required to retain and/or repair the heritage item or building is of such a scale that the heritage values and integrity of the heritage item or building would be significantly compromised, and the heritage item would no longer meet the criteria for scheduling in Policy 9.3.2.2.1.

iii. whether the costs to retain the heritage item or building (particularly as a result of damage) would be unreasonable;

iv. the ability to retain the overall heritage values and significance of the heritage item or building through a reduced degree of demolition; and

v. the level of significance of the heritage item.

- 13 CPT consider that the Church's heritage status is considerably diminished given its current state of disrepair and it no longer meets the criteria for listing. CPT therefore seeks that:

- 13.1 The Church's heritage item (heritage item number 465) and heritage setting (heritage setting number 220) be removed from the Schedule of Significant Historic Heritage in Appendix 9.3.7.2 of the District Plan.

Signed for and on behalf of Church Property Trustees by its solicitors and authorised agents Chapman Tripp



Jo Appleyard
Partner
12 May 2023

Address for service of submitter:

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APPENDIX 1

No.	Provision	Position	Submission	Relief Sought
1	Definition of 'Alteration'	Oppose	The definition has the effect of meaning that any change, modification or addition to a heritage item, heritage setting or heritage fabric, or a building in a heritage area will constitute an 'alteration' and trigger corresponding rules and consent requirements, irrespective of whether it impacts on heritage fabric. This will create unnecessary, costly and inefficient consent requirements, and provide no benefits in respective of heritage.	Retain status quo.
2	Definition of 'Demolition'	Oppose	The amended definition has the effect of meaning that any destruction of a non-substantial part of a building constitutes 'demolition' and triggers corresponding rules and consent requirements. This will create unnecessary, costly and inefficient consent requirements for inconsequential partial demolition work, create conflict with the definition of 'alteration', and provide no benefits in respective of heritage.	Retain status quo.
3	Definition of 'Heritage setting'	Oppose	The amended definition removes the wording that a setting <i>'together with the associated heritage item, has met the significance threshold'</i> and instead states that <i>'Heritage settings have not been assessed as meeting the significance threshold for scheduling'</i> . The submitter considers that heritage settings that	Retain status quo.

			do not meet the significance threshold for scheduling should not be listed, with associated regulatory requirements.	
4	Policy 9.3.2.2.8- Demolition of scheduled historic heritage	Oppose	The changes to clause (a)(ii) are opposed insofar that they introduce a new 'test' for evaluating the demolition of historic heritage that presents an unreasonable and inappropriate threshold that materially changes and undermines the policy. By way of example, the proposed wording may preclude the demolition of heritage items that are significantly (physically) compromised, on the basis of one or more (non-physical) heritage values (e.g. historical/social or cultural/spiritual value) remaining.	Retain status quo.
5	Matters of discretion 9.3.6.1(a)	Oppose	The submitter opposes the deletion of clause (a), given that damage incurred as a result of the Canterbury earthquakes of 2010 and 2011 including the costs of repair and reconstruction, remains a relevant matter for consideration.	Retain status quo for 9.3.6.1(a).
6	Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items	Oppose	For the reasons stated in the covering submission, the listing of the item and setting at 65 Riccarton Road is inappropriate. Accordingly, this listing should be deleted.	Delete Heritage Item 465 and Heritage Setting 220 regarding 65 Riccarton Road from Appendix 9.3.7.2.
7	Appendix 9.3.7.4	Oppose	The exemptions provided in Appendix 9.3.7.4 are an important tool for incentivising the	Retain the status quo.

	Heritage item and heritage setting exemptions		adaptive reuse and ongoing protection of heritage items. As such, the amendments proposed to this appendix which reduce the extent of exemptions is inconsistent with the Plan's objectives in relation to heritage and section 6 of the Act.	
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Submitter Details

Preferred method of contact	Email
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PC14 Submission - LMM Investments 2012 Ltd 3450-3487-1331

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: LMM Investments 2012 Limited (*LMM*)

- 1 This is a submission on the proposed plan change 14 (*PC14*) to the Christchurch District Plan (the *District Plan*).
- 2 LMM could not gain an advantage in trade competition through this submission.
- 3 LMM's submission relates to the whole of PC14.
- 4 LMM wishes to be heard in support of the submission.
- 5 If others make a similar submission, LMM will consider presenting a joint case with them at a hearing.

The Site

- 6 LMM have interests in the Whisper Creek Golf Resort land zoned Specific Purpose (Golf Resort) Zone in the Christchurch District Plan. LMM's intention is to develop the land for residential development, which would include elements of recreation, the naturalisation of waterways, and wetland restoration.
- 7 While not strictly a 'residential zone' (as defined by the National Planning Standards), there is no doubt that the Specific Purpose (Golf Resort) Zone for the land is predominantly 'urban' in nature and provides for some degree of residential activity.
- 8 LMM consider that the site is appropriate for rezoning to Medium Density Residential Zone (*MDRZ*) including an appropriate ODP and associated amendments to the policy and rule framework to give effect to the relief sought.

Tsunami Management Area

- 9 LMM opposes the introduction of the Tsunami Management Area (*TMA*) as notified in PC14 as a qualifying matter and seeks that these provisions be deleted in their entirety.
- 10 Firstly, LMM considers that the TMA as notified is legally wrong, and falls outside of the scope of what is allowed under the RMA to be included in an intensification planning instrument like PC14:
 - 10.1 Section 77I of the RMA only grants Council's the power to impose qualifying matters over 'relevant residential zones'. The TMA has been notified as applying over a whole range of commercial, industrial, open space, and rural zones.

- 10.2 A recent Environment Court¹ case has considered the issue of qualifying matters and found that these must only relate to making the intensified density standards themselves less enabling. It is not a mechanism that enables further constraint to the status quo. Such an amendment to the District Plan would be ultra vires. This is directly relevant to the TMA being proposed as a qualifying matter, which effectively proposes to make a range of status quo provisions less enabling of development (and not just the MDRZ).
- 11 It is also LMM's position that the extent of the overlay is excessive and not appropriately commensurate with risk. The TMA appears to be based off a 2019 report by NIWA (the *NIWA Report*) 1 in 500 year tsunami event with 1.06m² sea level rise by 2120. This modelled scenario is too conservative in light of the serious development restrictions the overlay places on private property.
- 12 LMM are not aware of any other tier 1 local authority using a 1:500 year tsunami risk as a qualifying matter. The modelled scenario is inconsistent with the standard coastal risk approaches throughout the country:

Canterbury Regional Policy Statement

- 12.1 In the Canterbury Regional Policy Statement (CRPS) 'high hazard areas' (albeit they do not relate to tsunamis but rather coastal inundation and erosion) at (1) also refers to a 1:500 year event for flooding (being the equivalent of 0.2%AEP) where depths are greater than one metre.
- 12.2 From our review of the NIWA Report, it appears the TMA notified includes all areas where inundation might occur from the tsunami scenario, where that is greater than 0m. In other words, land has been included in the TMA where depth will be far less than one metre in a 1:500 year event. It is difficult to see how the TMA is being justified in these areas.
- 12.3 Given the purpose of the TMA is to mitigate risk to life of people in the event of a tsunami, consideration should have been given to at which point that risk materialises. It is not appropriate to simply take the area from the NIWA report and convert this into an overlay without analysing the appropriateness of its extent any further.

The Greater Christchurch Partnership

- 12.4 The proposed TMA is larger than the Tsunami Inundation area identified by the Greater Christchurch Partnership as part of its consultation on the Greater Christchurch Spatial Plan (the *draft Spatial Plan*). The draft Spatial Plan maps include a map showing the Canterbury Coastal Natural Hazards. It is not clear why the TMA has not been mapped in a manner consistent with this map.

¹ *Waikanae Land Company Limited v Heritage New Zealand Pouhere Taonga* [2023] NZEnvC 56.

² We note that the section 32 report incorrectly records this as being 1.6m at [6.16.2].

The tsunami evacuation area

- 12.5 The TMA is also similar to the Canterbury Tsunami Evacuation Zones. The commentary to these zones is as follows:

"Tsunami evacuation zones are areas that we recommend people evacuate from as a precaution after they feel a long or strong earthquake, or in an official tsunami advisory or warning. They encompass many different possible tsunami scenarios.

The area that would be flooded in any particular tsunami depends on many factors, including:

- *the size of the earthquake*
- *precisely how the earthquake fault moved*
- *the direction the tsunami is coming from*
- *the tide level when the largest waves arrive.*

Every tsunami will be different and we can never say for sure exactly which areas within a zone will be flooded. There is no one tsunami that would flood an entire zone.

We consider many different tsunami scenario models when drawing the tsunami evacuation zones. The inland boundary of the zones is based on several 'worst-case' scenarios – very rare tsunamis that we might expect once every 2500 years."

[emphasis added]

- 12.6 Environment Canterbury themselves recognise that:³

"... the tsunami evacuation zones are not appropriate for property-specific land use planning. Land use planning considers the sustainability of development in an area as well as life safety and wellbeing issues, whereas tsunami evacuation zones are fundamentally about life safety. For this reason, as explained above, the zones are generally conservative, and the yellow zone in particular represents an extreme event that we would only expect in the order of every 2500 years, which is beyond most land use planning time frames."

[emphasis added]

- 12.7 This further demonstrates the inappropriately conservative nature of the TMA.

The NIWA Report

- 12.8 The NIWA Report on which the TMA is based also recognises that the maps are highly conservative and caveats many of its own findings:

³ Review of tsunami evacuation zones for Christchurch City, Report No. R19/125, prepared by Helen Jack dated November 2019.

"Maps of the inundation extents should not be used at scales finer than 1:25,000. The overview maps are intended as a guide only and should not be used for interpreting inundation."

- 12.9 It is further noted the report was prepared with the intention of informing the Land drainage recovery program, and not specifically for the purposes of being applied as a qualifying matter to restrict development.
- 13 The costs of imposing such strict restrictions on development over such a conservative area significantly outweighs the benefits of reducing the risk of harm to people. Risk and development constraints need to be proportionate and appropriate.
- 14 LMM seeks that the TMA, and related provisions, be deleted in their entirety.
- 15 In the alternative, if the TMA is retained there needs to be:
 - 15.1 more focussed site-by-site assessments that reflect site specific considerations and mitigation; and
 - 15.2 a clear policy pathway for on-site mitigation.
- Financial contribution policy**
- 16 The proposed tree canopy cover and financial contributions provisions are unworkable and unreasonable.
- 17 The provisions are difficult to understand and create considerable uncertainty. For example:
 - 17.1 If trees are retained over and above the 20% cover threshold will a financial credit be provided to the applicant?
 - 17.2 It is not clear who would be qualified to undertake the assessment of the canopy cover.
 - 17.3 The proposed definitions of PC14 introduce the definition of a 'hedge' with specific reference to the tree canopy cover and financial contributions provisions, yet those provisions do not utilise that term.
 - 17.4 If a stormwater basin is heavily planted in native shrubs, should this receive a credit as plants (and not just trees) also provide for carbon sequestration?
 - 17.5 How will the timing of assessment work in relation to consenting processes? For greenfield subdivisions for example, landscape plans are often not completed until after resource consent is issued.
- 18 The canopy cover provisions would be difficult to enforce. If canopy cover is determined as acceptable at the time of resource consent and 10 years or 15 years later one or some of those trees are cut down, who monitors and enforces that

requirement? Does Council have the staff resources to maintain that level of monitoring across wide swathes of the city?

- 19 Councils increasingly seek a reduction in reserve areas within greenfield subdivisions, on the basis of ongoing maintenance costs for the Council. It would be very difficult to achieve a 20% of net site area coverage in most greenfield subdivisions, noting that those reserve areas are also required for other purposes such as playground and open grass for play areas, that are incompatible with extensive tree canopy cover.
- 20 The provisions require 20% of the net site area adjacent to road corridors to contain tree cover. Accommodating tree cover typically necessitates wider road corridors. Wider road corridors reduces land available for housing, in direct conflict with the existing District Plan provisions stipulating a minimum density of 15 hh/ha must be achieved for greenfield subdivision areas, and more generally the NPS-UD.
- 21 The cost implications of not achieving tree cover are considerable and, given LMM does not consider the 20% cover is achievable, will add further to development costs that are then passed onto purchasers.
- 22 The implications of this proposed policy are significant from an economic perspective and must be adequately justified by the Council. As it stands, LMM do not consider the Council has done this and therefore the proposed financial contributions policy should be deleted in its entirety.

Signed for and on behalf of LMM Investments 2012 Limited by its solicitors and authorised agents Chapman Tripp



Jo Appleyard
Partner
12 May 2023

Address for service of submitter:

LMM Investments 2012 Limited
c/- Jo Appleyard / Lucy Forrester
Chapman Tripp
Level 5, PwC Centre
60 Cashel Street
PO Box 2510
Christchurch 8140
Email address: Jo.Appleyard@chapmantripp.com / Lucy.Forrester@chapmantripp.com

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Anita

Last name:

Collie

Organisation:

MGZ Investments Limited

Preferred method of contact

Email

Attached Documents

Name
Plan Change 14 Submission-65 Parkstone Avenue-FINAL

Form 5
Submission on notified proposal for a Plan Change
 Clause 6 of Schedule 1, Resource Management Act 1991

To: **Christchurch District Council**

Name of Submitter: **MGZ Investments Limited**

Background

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

- (d) rezoning of industrial areas near the central city for housing and mixed-use activities;
- (e) introducing qualifying matters to reduce the scale and density of buildings enabled by the MDRS and NPS-UD is reduced; and
- (f) amending objectives, policies, and other provisions throughout the District Plan.

Introduction

5. This is a submission on PC14 made by MGZ Investments Limited (**the submitter**). The submitter has interests in the property legally described as Lot 36 Deposited Plan 27979 as held within the Record of Title CB10A/1265, located at 65 Parkstone Avenue in Ilam, Christchurch (**the site**).
6. The property is depicted in **Figure 1** below.

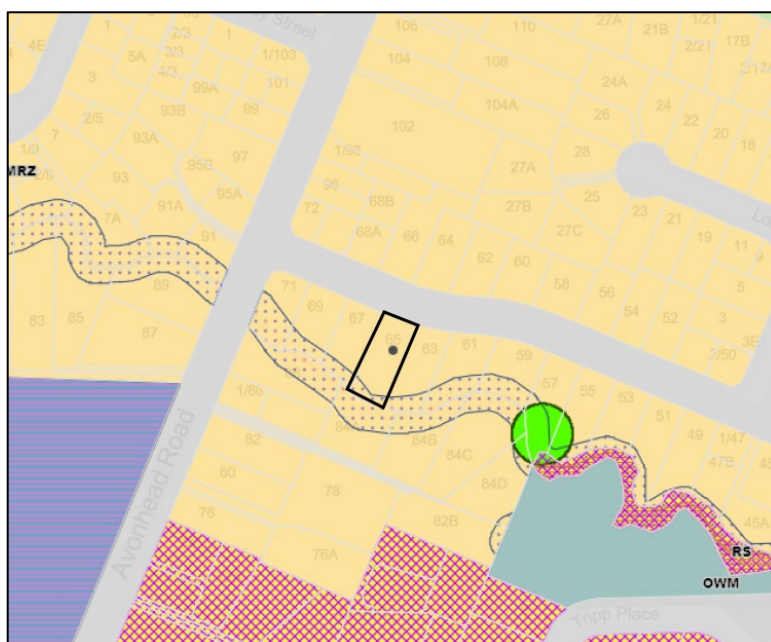


Figure 1 Location of the property within black boundaries, with zoning illustrated (CCC District Plan – PC14 Maps).

7. The property is located on Parkstone Avenue which is a collector road. The property has legal access from Parkstone Avenue.
8. The property is located within the Residential Suburban Zone under the operative District Plan. The site is proposed to be zoned as Medium Density Residential Zone under PC14.

Specific provisions of the plan change that this submission relates to

9. The submitter has an interest in the plan change as a whole and therefore this submission relates to all provisions and zonings of the plan change. The submitter has a specific interest in all provisions and zoning that relate to the properties referred to above.

Submission

10. The submitter both **supports** and **opposes** the plan change as notified. More specifically:
 - (a) the submitter supports the intensification of urban form to provide for additional development capacity, particularly near the city and commercial centres, and supports any provisions or changes to the District Plan that will achieve this outcome; and
 - (b) the submitter opposes any provisions or changes that will adversely affect the outcome in (a);
 - (c) the submitter requests that the site and surrounding properties are rezoned to High Density Residential, better reflecting the site context in an area of high housing demand and better giving effect to the NPS-UD.
11. Policy 3 of the NPS-UD is of direct relevance, whereby at sub clause (d) it directs that the district plan is to enable building heights and density of urban form commensurate with the level of commercial activity and community services.
12. The submitter's site and surrounding locale is ideally suited for a higher density of development, being in a location that exhibits a clear and immediate need for further housing supply in a convenient location to public transportation.
13. The Submitter also considers that the density standards as set out in the Amendment Act best achieve the NPS-UD, and PC14 should be amended to reflect those.
14. Rezoning the site to provide for high density residential development along with commensurate changes to the District Plan to provide for this submission and give effect to the NPS-UD will:
 - (a) enable more people to live in an urban environment where there is a high demand for housing in the area, relative to other areas in the urban environment;
 - (b) contribute to the social and economic well-being of communities and meet the reasonably foreseeable needs of future generations;
 - (c) represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means;
 - (d) give effect to the NPS-UD (notably Policy 3) and Canterbury Regional Policy Statement; and
 - (e) promote the sustainable management of natural and physical resources, will be consistent with Part 2 of the Resource Management Act 1991 and ultimately achieve its purpose.

Relief Sought

15. The submitter seeks that the NPS-UD is properly and fully given effect to through the provisions and zoning of PC14 through the intensification of development through enabling plan provisions and an increase in development capacity for residential and business use across the district.
16. The Submitter primarily seeks the following from the Council:
 - (a) the submitters site and the surrounding area be rezoned to High Density Residential; or
 - (b) the proposed Medium Density Zone is further enabled to provide a higher density of development;
 - (c) reject, refuse, or otherwise decline the Qualifying Matters that do not align with that directed by the Central Government through the Amendment Act.
 - (d) any other additional or consequential relief to the District Plan, including but not limited to, the maps, issues, objectives, policies, rules, controls/discretions, assessment criteria and explanations that will give effect to the matters raised in this submission and the relevant planning legislation.

Other

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

DATED 12 May 2023


pp. _____

MGZ Investments Limited

Address for Service: Town Planning GroupPO Box 35
Christchurch 8014

Contact Person:

Anita Collie

Cell:

021 568 335

E-mail:

anita@townplanning.co.nz

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Michelle

Last name:

Grinlinton-Hancock

Organisation:

Kiwi Rail

Preferred method of contact

Email

Attached Documents

Name
KiwiRail Submission

12 May 2023

To: Christchurch City Council (**Council**)

Subject: Submission on Plan Change 14 to the Christchurch District Plan (**Plan Change 14**)

Scope and nature of submission

1. KiwiRail welcomes the opportunity to provide feedback on Plan Change 14 to enable intensification of housing in urban areas as required under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (**Amendment Act**).
2. This submission relates to the following provisions of Plan Change 14:
 - (a) identification of the NZ Rail Network as a qualifying matter;
 - (b) setbacks from the rail corridor and the inclusion of appropriate matters of discretion; and
 - (c) inclusion of vibration provisions.
3. KiwiRail could not gain an advantage in trade competition through this submission.

KiwiRail's operations

4. KiwiRail is the State-Owned Enterprise responsible for the construction, maintenance and operation of New Zealand's rail network. KiwiRail is also a Requiring Authority that holds railway purpose designations in District Plans throughout New Zealand.
5. KiwiRail's national railway network (which comprises of 3,700km of track, over 200 locomotives, 18,100 hectares of land and 1,350 modern and heritage buildings)¹ is a nationally and regionally significant infrastructure asset. The rail network is critical to the safe and efficient movement of freight and passengers throughout New Zealand, and forms an essential part of the national transportation network and the wider supply chain. New Zealanders have invested significantly in the rail network and it is a critical public asset.
6. The benefits of rail to the New Zealand economy were estimated in 2019 to be in the order of \$1.7 – 2.1 billion.² The economic significance of rail and the critical role it plays in reducing New Zealand's carbon emissions has been recognised by the Government through its continued investment in rail infrastructure. Transport modal shifts to more climate-friendly modes of transport, like rail, are critical to reduce carbon emissions. As a result, rail is experiencing a renaissance as evidenced by the significant investment being made by the Government to reinvestigate the railway network, demonstrating a strong and continued confidence in rail's current and future potential.

¹ Half Year Annual Report 2022 and Unaudited Financial Statements for the Six Months Ended 31 December 2021 (KiwiRail, 2022) at page 5.

² The Value of Rail in New Zealand – Report for the Ministry of Transport (EY, Wellington, 2021) at page 8.



7. In the most recent budget, the Government allocated \$349 million to replace and modernise New Zealand rail assets,³ which has gone towards a number of major projects nationwide, including the rejuvenation of the Northland railway lines, the reopening of the Napier to Wairoa line, establishing a multi-million dollar regional freight hub in Palmerston North, and significant upgrades to the Auckland, Wellington and Hamilton metro networks.
8. KiwiRail's Main South Line, Midland Line, Hornby Industrial Line, and Main North Line pass through the Christchurch District. All these lines are of regional and national importance, supporting the movement of freight and passengers through the country via rail. Growth in use of these lines is expected as part of the mode shift in freight moving off roads and onto rail as part of New Zealand's goals to reduce emissions from transport.

Urban Development around the Rail Corridor

9. The fundamental driver of the Amendment Act and Plan Change 14 is to enable intensification of housing in urban areas. KiwiRail supports urban development, including around transport nodes, and recognises the benefits of co-locating housing near transport corridors.
10. However, it is critical that Plan Change 14 provides for adequate management of the interface between urban development and lawfully established, critical infrastructure, such as the railway network. This is necessary to ensure our communities are built in healthy living environments, and the railway network can operate and develop in the future without constraint. An integrated and proactive approach to planning is critical to support the overall vision of our urban environments, and to ensure that our transport network can support the increasing growth and housing intensification.
11. The nature of railway operations means KiwiRail cannot fully internalise all its effects within the railway corridor boundaries. Environmental legislation and caselaw recognises the lawful emission of such effects. Increasing development around railway corridors consequentially means the introduction of more sensitive receivers to adverse effects of existing and lawful railway activities. With a proposed increase in sensitive activities in proximity to the railway corridor as a result of the increased density enabled by Plan Change 14, KiwiRail is concerned that without appropriate planning measures in place at a territorial level, the risk of adverse health and amenity effects impacting people locating in proximity to the railway corridor, and reverse sensitivity effects constraining its operations is significantly elevated.
12. The two primary ways which KiwiRail seeks to manage this interface at a national level is through the inclusion of the following controls in District Plans:
 - (a) **Noise and vibration controls** – requiring acoustic insulation and ventilation to be installed in new (or altered) sensitive uses within 100m of the railway corridor. Within 60m of the railway corridor, controls are sought that buildings containing new (or altered) sensitive uses are constructed to manage the impacts of vibration. These controls are important to ensure new development is undertaken in a way that achieves a healthy living environment for people locating within proximity to

³

Wellbeing Budget 2022 – A Secure Future (New Zealand Government, Wellington, 2022) at page 82.



the railway corridor, minimising the potential for complaints about the effects of the railway network; and

- (b) **Boundary setbacks** – requiring a "no-build" setback within 5m of the railway corridor for new buildings or structures on sites adjoining the railway corridor. This is to ensure that people can use and maintain their land and buildings safely without needing to extend out into the railway corridor, minimising the risks of physical interference on railway operations and health and safety hazards on these residents.

Setbacks

13. The existing provisions of the District Plan include 4m setbacks from the rail corridor across a range of urban zones.⁴
14. In respect of the Amendment Act and Plan Change 14, the MDRS mandate a 1m setback from side and rear yards, and a 1.5m setback from front yards. However, the Amendment Act enables the Council to amend the MDRS and intensification requirements where a "qualifying matter" applies. The qualifying matters expressly include:⁵
 - (a) the need to give effect to a designation (but only in relation to the land that is subject to that designation); and
 - (b) matters "required for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure". The rail network is nationally significant infrastructure for the purposes of the Amendment Act.
15. The Council has recognised the rail corridor as a qualifying matter in Plan Change 14,⁶ and has retained the existing building setback of 4m from the rail corridor within the District Plan.
16. KiwiRail supports the District Plan provisions requiring a setback from the rail corridor. However, KiwiRail considers 5m is the appropriate distance for setbacks instead of the 4m provided for under the District Plan. This distance is especially necessary given the increased building height and reduced height to boundary controls enabled under the MDRS which increase the risk of potential interference with the rail corridor from maintenance and other activities being undertaken on sites adjoining the rail corridor.
17. KiwiRail is also seeking an addition to the matters of discretion to require specific consideration by decision makers of the effects on the rail corridor where the setback from the rail corridor is infringed. KiwiRail considers a matter of discretion directing consideration of impacts on the safety and efficiency of the rail corridor is appropriate in situations where the 5m setback standard is not complied with.

⁴ See for example, 14.5.2.7

⁵ RMA, Sections 771(e) and (g); 770(e) and (g).

⁶ Chapter 6.1A Qualifying matters, Table 1 "Safe or efficient operation of nationally significant infrastructure (NZ Rail Network).



Noise and vibration

18. Rule 6.1.7.2.1 in the District Plan contains activity standards relating to sensitive activities near roads and railways. Plan Change 5E to the District Plan proposed to replace Rule 6.1.7.2.1 primarily to improve clarity and efficiency of the rule. The Panel has issued its recommendation on Plan Change 5E recommending the Rule 6.1.7.2.1 – Sensitive activities near roads and railways and replace with new Rule 6.1.7.2.1– Sensitive activities near roads and railways outside the Central City. KiwiRail seeks that the new Rule 6.1.7.2.1 be retained as set out in the Panel decision.
19. The Operative District Plan and Plan Change 5E do not contain any vibration controls to ensure that buildings containing new (or altered) sensitive uses are constructed to manage the impacts of vibration.
20. Acoustic and vibration standards are important controls to ensure the ongoing health and wellbeing of the occupants of the higher density living areas and are instrumental in ensuring that reverse sensitivity effects on rail are minimised particularly where intensive residential development is proposed adjacent to the rail corridor. The acoustic and vibration standards seek to ensure that where urban development co-locates near the rail corridor, the health and amenity of residents is not adversely affected, and the rail corridor is protected from reverse sensitivity effects.
21. KiwiRail considers it is appropriate that these controls apply on a district-wide basis as related provisions that are necessary to ensure intensification in and around the rail corridor is appropriately managed (particularly in the context of the additional intensification proposed through Plan Change 14). KiwiRail seeks that a vibration standard be inserted for buildings within 60m of the rail corridor to ensure that vibration effects are appropriately addressed.

General reasons for the submission

22. The identification of the NZ Rail Network as a qualifying matter, the amendments to the acoustic provisions, the inclusion of vibration provisions and setbacks from the rail corridor (as proposed to be amended below) will:
 - (a) promote sustainable management of resources, achieve the purpose of the RMA, and are not contrary to Part 2 and other provisions of the RMA;
 - (b) meet the reasonably foreseeable needs of future generations;
 - (c) enable the social, economic and cultural wellbeing of the community in Christchurch City; and
 - (d) provide and promote the greatest health, safety and amenity outcomes and preserve operational and developmental capacity and efficiency for nationally significant infrastructure.



Relief Sought

23. KiwiRail seeks:

- (a) the retention of identification of the NZ Rail Network as a qualifying matter;
- (b) amendment to the activity standards in Rule 6.1.7.2 (as amended by Plan Change 5E) to include the following standard relating to vibration:

<p>NOISE- RX – Permitted activity</p>	<p>KiwiRail seek that vibration controls be included to apply to sensitive uses within 60m of the legal boundary of any railway boundary.</p> <p>KiwiRail seek that non compliance with the permitted standards be assessed as a restricted discretionary activity with appropriate matters of discretion.</p>	<p><u>Indoor railway vibration</u></p> <p><u>1. Any new buildings or alterations to existing buildings containing a noise sensitive activity, within 60 metres of the boundary of any railway network, must be protected from vibration arising from the nearby rail corridor.</u></p> <p><u>2. Compliance with standard 1 above shall be achieved by a report submitted to the council demonstrating compliance with the following matters:</u></p> <p><u>(a) the new building or alteration or an existing building is designed, constructed and maintained to achieve rail vibration levels not exceeding 0.3 mm/s vw,95 or</u></p> <p><u>(b) the new building or alteration to an existing building is a single-storey framed residential building with:</u></p> <ul style="list-style-type: none"> <u>i. a constant level floor slab on a full-surface vibration isolation bearing with natural frequency not exceeding 10 Hz, installed in accordance with the supplier's instructions and recommendations; and</u> <u>ii. vibration isolation separating the sides of the floor slab from the ground; and</u> <u>iii. no rigid connections between the building and the ground.</u> <p><u>Matters of discretion</u></p> <p><u>(a) location of the building;</u></p> <p><u>(b) the effects of any non-compliance with the activity specific standards;</u></p> <p><u>(c) special topographical, building features or ground conditions which will mitigate vibration impacts;</u></p> <p><u>(c) the outcome of any consultation with KiwiRail.</u></p>
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- (c) amendment to the setback provisions in the Residential and Commercial Zones to provide for a 5 metre setback and amendments to the matters of discretion to direct consideration of the effects on the rail corridor.

(The text introduced through Plan Change 14 is shown in black underline and strikethrough and KiwiRail's proposed addition is shown in red underline below).

<p>14.5 Rules – Residential Medium Density Residential Zone</p>	<p>14.5.2.7 Minimum building setbacks from internal boundaries and railway lines</p> <p>a. The minimum building setback from internal boundaries shall be:</p> <p>...</p> <p>vi. <u>v.</u> Buildings, balconies and decks on sites adjacent to or abutting a designated rail corridor</p> <p>4<u>5</u> metres from the rail corridor boundary</p>
<p>14.5.1.3 Restricted discretionary activities</p>	<p>RD12. Buildings that do not meet Rule 14.5.2.7(v) relating to rail corridor boundary setbacks</p> <p>The Council's discretion shall be limited to the following matters:</p> <p>a. Whether the reduced setback from the rail corridor will enable buildings to be maintained without requiring access above, over, or on the rail corridor <u>while providing for the safe and efficient operation of the rail network.</u></p>
<p>14.6 Rules – <u>High Density</u> Residential Central City Zone</p>	<p>14.6.2.3 Road boundary building Setbacks</p> <p><u>a. Buildings must be set back from the relevant boundary by the minimum depth listed below:</u></p> <p><u>i. Front: 1.5 metres</u></p> <p><u>ii. Side: 1 metre</u></p> <p><u>iii. Rear: 1 metre (excluded on corner sites)</u></p> <p><u>(iv). Rail corridor boundary: 5 metres</u></p>
<p>14.6.1.3 Restricted discretionary activities</p>	<p>RD10</p> <p>a. Buildings that do not meet Rule 14.6.2.3 – Setbacks.</p> <p>b. Any application arising from Rule 14.6.2.3.a.i shall not be limited or publicly notified.</p> <p>c. Any application arising from this rule, for up to three residential units per site shall not be publicly notified.</p>



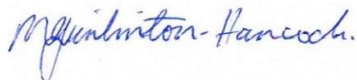
	<p><u>d. Any application arising from (iv) shall not be publicly notified and shall be limited notified only to KiwiRail (absent its written approval).</u></p> <p>The Council's discretion shall be limited to the following matters:</p> <p>a. Impacts on neighbouring property – Rule 14.15.3.a</p> <p><u>b. Whether the reduced setback from the rail corridor will enable buildings to be maintained without requiring access above, over, or on the rail corridor while providing for the safe and efficient operation of the rail network.</u></p>
15.4 Rules – Commercial Core <u>Town Centre Zone</u>	<p>15.4.2.9 Minimum building setback from railway corridor</p> <p>a. For sites adjacent to or abutting the railway line, the minimum building setback for buildings, balconies and decks from the rail corridor boundary shall be 4 <u>5</u> metres.</p>
15.45.2 – Built form standards – Commercial Core <u>Local Centre Zone</u>	<p>15.45.2.9 Minimum building setback from railway corridor</p> <p>a. For sites adjacent to or abutting the railway line, the minimum building setback for buildings, balconies and decks from the rail corridor boundary shall be 4 <u>5</u> metres.</p>
15.56.2 Built form standards – Commercial <u>Local Neighbourhood Centre Zone</u>	<p>15.56.2.8 Minimum building setback from railway corridor outside the Central City</p> <p>a. For sites adjacent to or abutting the railway line, the minimum building setback for buildings, balconies and decks from the rail corridor boundary shall be 4 <u>5</u> metres.</p>
15.67.2 Built form standards – Commercial Banks Peninsula Zone	<p>15.67.2.8 Minimum building setback from railway corridor</p> <p>a. For sites adjacent to or abutting the railway line, the minimum building setback for buildings, balconies and decks from the rail corridor boundary shall be 4 <u>5</u> metres.</p>
15.78.2. Built form standards – Commercial <u>Retail Park Large Format Retail Zone</u>	<p>15.78.2.8 Minimum building setback from railway corridor</p> <p>a. For sites adjacent to or abutting the railway line, the minimum building setback for buildings, balconies and decks from the rail corridor boundary shall be 4 <u>5</u> metres.</p>
15.89.2 Built form standards – Commercial Office Zone	<p>15.89.2.9 Minimum building setback from railway corridor</p> <p>a. For sites adjacent to or abutting the railway line, the minimum building setback for buildings, balconies and decks from the rail corridor boundary shall be 4 <u>5</u> metres.</p>



15.910.2 Built form standards – Commercial Mixed Use Zone	15.910.2.8 Minimum building setback from railway corridor a. For sites adjacent to or abutting the railway line, the minimum building setback for buildings, balconies and decks from the rail corridor boundary shall be 4 5 metres.
15.4314.3 Matters of discretion for built form standards	15.4314.3.10 Minimum building setback from the railway corridor a. Whether the reduced setback from the rail corridor will enable buildings to be maintained without requiring access above, over, or on the rail corridor, <u>while providing for the safe and efficient operation of the rail network.</u>

24. KiwiRail wishes to be heard in support of this submission. If other parties make similar submissions, KiwiRail would consider presenting a joint case with those parties at the hearing.

Yours faithfully



Michelle Grinlinton-Hancock
RMA Team Leader



Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Catherine


Last name:

Gallagher

Preferred method of contact

Email

Attached Documents

Name	
Catherine	

Robson, Gina

From: Katie Gallagher <gpv@xtra.co.nz>
Sent: Friday, 12 May 2023 2:31 pm
To: Engagement
Subject: submission for PC14 Plan change

Save time and do it online
ccc.govt.nz/haveyoursay

Have your say Housing and Business Choice Plan Change 14 and Heritage Plan Change 13

Clause 6 of Schedule 1 Resource Management Act 1991

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

Gender: ☐ Male ☒ Female ☐ Non-binary/another gender
Age: ☐ Under 18 years ☐ 18-24 years ☐ 25-34 years ☐ 35-49 years ☒ 50-64 years
☐ 65-79 years ☐ over 80 years
Ethnicity: ☒ New Zealand European ☐ Māori ☐ Pacific Peoples ☐ Asian
☐ Middle Eastern/Latin American/African ☐ Other European ☐ Other

* Required information

Name* CATHERINE GALLAGHER (KATIE)
Address* 35 WATFORD STREET, STRAWAN Postcode* 8052
Email gpv@xtra.co.nz Phone no. 021 735004
If you are responding on behalf of a recognised organisation, please provide:
Organisation's name _____
Your role _____

Trade competition and adverse effects* (select appropriate)

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

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

- (a) adversely affects the environment, and
(b) does not relate to the trade competition or the effects of trade competition? ☐ Yes ☒ No

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

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

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

Joint submissions (Please tick this box if you agree)

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

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

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

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

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

Signature CA Gallagher Date 12/5/23

Have your say

Housing and Business Choice Plan Change 14

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

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

Sections 14.2.8.5 and 14.2.8.6 + 14.2.4.2 + 7.2.1.2 + 7.2.1.1

The huge impact on parking in what is already a congested area particularly around the St Andrews College area. Issues with congestion, double parking and other unsafe driving practices will be exacerbated with intense residential development. Increased pressure on our drainage system could be catastrophic - Breckley Ave is already prone to severe flooding (latest was on 11/6/23). The character of the locality will be destroyed. The Plan Change would have a negative impact on parking.

My submission is that: for vulnerable members of the community including the elderly + disabled.

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

I oppose the provision of PC14 as they will destroy the character of the Stronan locality and will put enormous + unsafe pressure on already 'stretched' amenities + infrastructure.

I seek the following decision from the Council:*

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

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

I would like to see the PC14 amended to limiting the HR2 north from Meivale centre to Hector St / Innes Rd and south from Papanui commercial centre to Bligh Rd and not extending the HR2 along this stretch of Papanui Rd through the Stronan suburbs.

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Anthony


Last name:

Gallagher

Preferred method of contact

Email

Attached Documents

Name	
Anthony	

Have your say

Housing and Business Choice Plan Change 1 and Heritage Plan Change 13

Clause 6 of Schedule 1 Resource Management Act 1991

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

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

Age: ☐ Under 18 years ☐ 18-24 years ☐ 25-34 years ☐ 35-49 years
☐ 50-59 years ☐ 60-69 years ☐ 70-79 years ☐ 80-89 years ☐ over 90 years

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

* Required information

Name* ANTHONY GALLAGHER (TONY)

Address* 35 WATFORD ST, STROWAN

Email gpv@extra.co.nz Phone no. _____

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

Organisation's name _____

Your role _____

Trade competition and adverse effects* (select appropriate)

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

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

(a) adversely affects the environment, and

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

* A person who could gain an advantage in trade competition through the submission may make a submission on the basis of Clause 6 of Schedule 1 of the Resource Management Act 1991

Have your say Housing and Business Choice Plan Change 14

The specific provisions of the plan change that my submission relates to are as follows:^{*}
(Please continue on separate sheet(s) if necessary.) Sections 14.2.8.5 and 14.2.8.6 + 14.2.4.2 + 7.2.1.2 + 7.2.1.1.

The huge impact on parking in what is already a congested area particularly around the St Andrews College area. Issues with congestion, double parking and other unsafe driving practices will be exacerbated with intense residential development. Increased pressure on our drainage system could be catastrophic - Breckley Ave is already prone to severe flooding (latest was on 11/6/23). The character of the locality will be destroyed. The Plan Change would have a negative impact on parking.

My submission is that: ^{*} for vulnerable members of the community including the elderly + disabled.
(You should clearly state whether you support or oppose the specific proposed provisions or wish to have them amended. You should also state the reasons for your views. Please continue on separate sheet(s) if necessary.)

I oppose the provision of PC14 as they will destroy the character of the Stronan locality and will put enormous + unsafe pressure on already 'stretched' amenities + infrastructure.

I seek the following decision from the Council:^{*}

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

I would like to see the PC14 amended to limiting the HR2 north from Merivale centre to Hector St / Innes Rd and south from Papanui commercial centre to Bligh Rd and not extending the HR2 along this stretch of Papanui Rd through the Stronan suburbs.

Submitter Details

First name: Finn

Last name: Jackson

Preferred method of contact	Email
-----------------------------	-------

Attached Documents

Name
Finn

Robson, Gina

From: Generation Zero <noreply@123formbuilder.com>
Sent: Friday, 12 May 2023 9:40 pm
To: Engagement
Subject: CCC District Plan Changes (PC14) - Generation Zero Quick Submit / 531

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

Form Summary

1. First / Last name	Finn Jackson
2. Email address	finn.jackson982@gmail.com
3. Postal Address	Flat 1, 108A Ruskin Street Addington Christchurch 8024
4. Trade competition/adverse effects:	Option 1: I could not gain in trade competition through this submission
5. Answer if you selected option 2 above:	Are you directly affected by a possible effect of this plan change in a way that it: a. adversely affects the environment, and b. does not relate to the trade competition or the effects of trade competitions
Chapter 6 - Tree Canopy Cover and Financial Contributions	<p>The council will require 20% of new residential developments to be covered by trees, or otherwise pay a financial contribution to help the council plant more trees on public land. Christchurch has an appallingly low tree canopy cover rate of 13% compared to Auckland (18%) and Wellington (30%). Trees have a wide range of environmental, health, social and economic benefits and are important for the future of our city.</p> <p>I support the Tree Canopy Cover rules and Financial Contributions to restore our tree canopy. Trees are important in reducing emissions,</p>

Form Summary

providing shade and temperature control in the summer, alongside the other wide range of economic, health and social effects. I seek that the council retains the tree canopy requirement and contributions plan.

Chapter 14 - Low Public Transport Accessibility Area Qualifying Matter

The council plans to restrict housing in some areas of the city because they are poorly serviced by the lack of current high frequency public transport routes. Some areas solely designated with this qualifying matter such as in Casebrook and Styx are close to rail corridors, existing commercial areas and are serviced by low frequency routes. In the future, these areas could see a boost in service by more buses on current routes or introduction of a commuter rail service.

I oppose the Low Public Transport Accessibility Area Qualifying Matter as I believe that the public transport layout and network will need changes to prepare and accommodate future growth. We should not define future growth in Christchurch based on these routes. This would also artificially limit future housing in our city. I seek that the council drop this qualifying matter.

Chapter 14 - Sunlight Access Qualifying Matter

There are many cities in the world that have high density and are further from the equator than Christchurch. Cities such as Vienna, Copenhagen, Toronto, Geneva, and Calgary are consistently ranked some of the most livable cities in the world. This qualifying matter would reduce the maximum height and size of medium residential buildings below what is legally required. This qualifying matter has been developed with the expressed purpose of protecting and increasing property values rather than increasing the amount of affordable housing for people.

Chapter 14 - High-Density Residential Zone

The council is required by law to allow residential buildings of at least 6 storeys within a 1.2km radius of commercial centres such as malls and the city centre. The council plan to enable this, while also allowing up to 10 storeys for residential buildings closer to the city centre. This would enable a wider range of dense housing development options. It would also allow more people to live close to services and amenities.

I support high-density housing near the city and commercial centres. We need to allow more people to live near services and amenities to reduce car dependency. This would allow more people to take active and public transport to commute, shop and play. I seek that the council enable 6 to 10 storeys for residential buildings near commercial centres.

Any other comments?

I'd like to see the sunlight qualifying matter removed in all zones outside the medium density and low density zones. Keeping it in those areas is a compromise I'm happy to have, but in the high density and mixed use areas in particular it would lead to poor urban design outcomes and limit the amount of housing that can be built.

I'd like to see additional requirements for permeable surfaces in dense areas to prevent flooding.

Form Summary

Finally, I'd like to see some or all corner sites in residential areas rezoned to a new residential mixed use zone, allowing for the development and operation of businesses like cafes, butchers, grocers, dairies and general convenience stores. This would enhance walkability and make for more pleasant, livable neighbourhoods.

The message has been sent from 115.189.97.112 nz at 2023-05-12 on Chrome 113.0.0.0

Entry ID: 203

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

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

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Andrew


Last name:

Kyle

Preferred method of contact

Email

Attached Documents

Name	
andrew	

Robson, Gina

From: Keryn Schroeder <schroeder.kyle@xtra.co.nz>
Sent: Friday, 12 May 2023 3:43 pm
To: Engagement
Subject: Submission - Housing and Business Choice Plan Change (PC14)

Save time and do it online
ccc.govt.nz/haveyoursay

Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

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

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

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

* Required information

Name* ANDREW KYLE

Address* 643 YALDHURST ROAD Postcode* 7676

Email Schroeder.kyle@xtra.co.nz Phone no. 0272308194

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

Organisation's name _____

Your role _____

Trade competition and adverse effects* (select appropriate)

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

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

(a) adversely affects the environment, and

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

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

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

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

☐ I wish to speak in support of my submission on Plan Change 14

☒ I do not wish to speak.

Joint submissions (Please tick this box if you agree)

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

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

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

Signature of submitter (or person authorised to sign on behalf of submitter)
A signature is not required if you make your submission by electronic means.

Signature Andrew Kyle Date 12-5-2023

Plan Change 14 Submission

By David Lawry:

Supported by Andrew Kyle:

Christchurch City Council (CCC) is predicting the need for 40,000 new houses in Christchurch over the next 30 years.

I Andrew Kyle see the future of Christchurch's housing development being pushed to the West of the city on stable TC1 land. Yaldhurst, Harewood and Islington already has sound infrastructure in place. The proximity to Hornby, (The Hub) has commercial and industrial and is a key employment site. This land is well above the water table at 17-meter static level. It is on a gravel base and does not require expensive remediation work.

I fully support David Lawry's submission. As a landowner in this Yaldhurst area, my family has ties to this area for 123 years. We therefore have been here before the airport existed. They have encroached on what we have been allowed to do on our land and have been seen to be a poor neighbour with a bullying presence. Communication has been poor and there has been no transparency with decibel lines and what this means to landowners in this area.

1. CCC studies have identified large tracks of land that are unfit for housing development due to sea level rise and other flood risks. Unfortunately for the people already living in many of these now identified risk suburbs, they will be adversely impacted. New subdivisions at the foothills of the Port Hills, known to be flood risks, continue to be consented.
2. It is public knowledge that CCC is facing very significant governance failures with respect to its own companies such as Christchurch International Airport (CIAL) and Lyttleton Port Company. These failings extend into the very body that is supported to provide the needed governance, Christchurch city holding corporation (CCHL). The fact that CCHLs past chair was a wanted FBI fugitive is just one indicator of the level of failure. While the current CCC, CEO has worked to address some of these matters there exists a major conflict of issues that are providing significant competitive advantages to, for example CIAL. I refer the panel to my in-depth submissions on this matter in Christchurch Plan Change 5. What is clear however is that due to the 'no surprises clause

requirement' of CCHL to the CCC CEO that regardless of the structure it is the CCC CEO who has the power to direct both the board and if need be actual company CEO's. If the CCC CEO can move to do away with CCHL all together then the real power to direct changed behaviours is held at that position.

3. Plan change 14 is stated as being designed to bring Christchurch's District Plan in line with government direction that has been given via the National Policy Statement-Urban Development (NPS-UD) and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act (The Act) to enable more development in the city's urban footprint.
4. However, it quickly becomes clear via the raft of new and modified Qualifying Matters that what is at play in this plan change, is a move to significantly push back against the new national standards.
5. While the lawyers, consultants, planners and others on billable hours will enjoy this farce the question remains: Where will the needed 40,000 new homes be enabled?
6. It has been indicated that a very high threshold of evidence is needed in order to establish an issue as a Qualifying Matter. The impact of these matters is to defeat the very intent of the Governmental intensification direction. Therefore, it is not surprising that the evidential threshold should be extremely high. The legal battles over what is and is not deemed to be a Qualifying matter will, I submit ensure that the needed intensification will be stalled, significantly.
7. The qualifying Matter that I am submitting on is the CIAL Noise residential activity avoidance contour, specifically the 50 dBA Ldn air noise Contour. This noise level equates to a slightly elevated speech. This contour impacts and negates new residential home building on hundreds of acres surrounding the Christchurch International Airport. These contours were required to be re- evaluated every ten years last due 2017 and are currently subject to protracted re- evaluation following Regional Councils requiring CIAL to do so in 2022.
8. The purpose of the contour regime is stated as ensuring that no curfew will result from noise complaints arising from the airport operations. What is more they are designed to capture the expected noise level when the airport reaches absolute capacity of flight activity. These contours have been exaggerated and inaccurate for in excess of 30 years, yet CCC have enabled this inaccuracy and allowed the competitive advantages that flow to CIALs property management business activities to remain. Additionally CCC has abdicated its statutory requirements to

investigate industrial noise pollution handing this over to a CIAL housed committee. CCC noise control personal take no action with regards to any airport related noise complaints. CCC refuses to even consider alternative methodologies to providing curfew risk reduction, such as contracting out of noise complaint actions. These matters and the associated risks arising from the ongoing lack of remedies have been raised directly to the current CCC CEO. Action by her is needed now if real governance is to be exhibited.

9. If the 50dBA air noise contour is permitted to be entrenched as a Qualifying Matter, then the opportunity for residential housing to be enabled on the safest remaining undeveloped land in Christchurch will be lost. Again, where are these 40,000 new homes going?
10. The fact is that CCC are well aware that the background noise levels due to population levels alone and excluding road noise for a significant proportion of the land under the 50 dBA Ldn air noise contour already exceeds 50dBA. This evidence was provided to them by world leading expert Professor John Paul Clarke during the Judge led Christchurch District Plan hearings but remains ignored. This fact makes a mockery of these development restrictions.
11. One opportunity cost to rate payers is the on-going annual value of thousands of new rates that could potentially be derived from new residential properties that are currently excluded due to this policy.
12. The actual costs outlined in points (9) and (11) are huge. They are being incurred based on an unrealistic, CIAL led and self-serving need for protection from a perceived risk that noise complaints could result in flight operation curfews. Yet the actual risk of CCC ever taking any action against its own company that resulted in a curfew or any action that impeded its operation is zero. The policy provides CIAL with a huge competitive advantage to its already monopolistic aviation operations and perversely its property development and management operations. It is not by chance that CIAL earns more from property development and management than from aviation activities. Yet the CCC, COE fails to intervene.
13. Then there is the issue of CIAL desiring to build a new wide body aircraft capable International Airport at Tarras. Why are CCC providing air noise contour protection for CIAL at Christchurch International Airport, based on an unrealistic total runway capacity, and incurring the opportunity costs outlined, when it is clear that CIAL intends to move its aviation market growth strategies away from Christchurch to Tarras? Already CIAL has significantly reduced its annual dividend to CCHL, CCC and therefore

rate payers. Already CIAL via FX issued bonds have raised several hundred million of dollars in new debt. Conservative estimates obtained indicate that the cost of the new runway if built at Tarras would exceed 1 billion dollars. To be clear this is just the runway tarmac asphalt alone not terminals and the numerous other facilities. Then there is the tricky issue that CIAL has failed to actually buy sufficient land to build the runway needed for the wide body aircraft operations. Additionally there are very significant consenting hurdles including the fact that the proposed runway is to be built on the New Zealand Crested Grebes main breeding ground. Where are the funds coming from?

14. I mentioned Governance failures at CCHL, which may or may not have been addressed. I submit that for all the reasons outlined there needs to be an urgent review as to how the situation has been reached whereby CIAL have managed to become the dog and CC the tail being wagged.

The sought remedies

1. That the 50dBA air noise contour be excluded from becoming a Qualifying Matter
2. That an urgent CCC CEO level review of the risk to housing crisis solutions and potential rate revenue earning opportunity that will be lost if hundreds of acres of safe land is to be excluded from residential development opportunity based on the curfew risk myth.
3. That the CCC CEO urgently consider the ramifications of supporting CIAL led evidence before the ECAN administration revaluation of the existing air noise contour using airport total future capacity. Is the air noise contour regime fit for purpose given that CIAL is moving its market growth strategies to Tarras? Why have other options not even been considered? Where are the funds for this new airport coming from and how does encouraging passengers to avoid Christchurch in favour of Tarras economically assist Christchurch's economy. Where is the transparency of a cost benefit analysis supporting this huge project? Indeed where is the much talked about Governance, transparency and guidance so badly required in order to correct the current flawed behaviours and CIAL project pathways?

Andrew Kyle

Andrew Kyle.

Sent from my iPhone

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Brendon

Last name:

Liggett

Organisation:

Kāinga Ora – Homes and Communities

Preferred method of contact

Email

Attached Documents

Name
kaingaora
KaingaOra_CCCPC14Submission_CityCentre
KaingaOra_CCCPC14Submission_PapanuiMerivale
20230512 Kainga Ora - ChChDP PC 13 submission vSIGNED

Robson, Gina

From: Lezel Beneke <lezel.beneke@kaingaora.govt.nz>
Sent: Friday, 12 May 2023 8:53 pm
To: Engagement
Cc: developmentplanning
Subject: RE: Kainga Ora Submission on Plan Change 14 of the Operative Christchurch District Plan
Attachments: KaingaOra_CCCPC14Submission_PapanuiMerivale.pdf;
 KaingaOra_CCCPC14Submission_CityCentre.pdf

Appendix 3 – Maps of HRZ and Height Variation Control – Maps Papanui and City Centre

From: Lezel Beneke
Sent: Friday, 12 May 2023 8:52 PM
To: 'engagement@ccc.govt.nz' <engagement@ccc.govt.nz>
Cc: developmentplanning <developmentplanning@kaingaora.govt.nz>
Subject: RE: Kāinga Ora Submission on Plan Change 14 of the Operative Christchurch District Plan

Appendix 3 – Maps of HRZ and Height Variation Control – Maps Riccarton and Hornby

From: Lezel Beneke
Sent: Friday, 12 May 2023 8:51 PM
To: 'engagement@ccc.govt.nz' <engagement@ccc.govt.nz>
Cc: developmentplanning <developmentplanning@kaingaora.govt.nz>
Subject: RE: Kāinga Ora Submission on Plan Change 14 of the Operative Christchurch District Plan

Kia ora,

Cognisant of the size of the document. I have broken the submission into:

- Cover letter
- Appendix 1 – Table of submission points
- Appendix 2 – Metropolitan Centre Zone provisions

I will send Appendix 3 separately.

**Lezel Beneke** MNZPI. BPlan(Hons)

Principal Development Planner

Development Planning

Urban Planning and Design

Mobile: 021 428 055

Email: lezel.botha@kaingaora.govt.nz

Freephone: 0800 801 601 | Mainline: (021) 428 055 | Kāinga Ora - Homes and Communities
P.O.BOX 2628, WELLINGTON, 6140 | New Zealand Government | www.kaingaora.govt.nz

From: Lezel Beneke**Sent:** Friday, 12 May 2023 8:48 PM**To:** 'engagement@ccc.govt.nz' <engagement@ccc.govt.nz>**Cc:** developmentplanning <developmentplanning@kaingaora.govt.nz>; Brendon Liggett
<Brendon.Liggett@kaingaora.govt.nz>**Subject:** RE: Kāinga Ora Submission on Plan Change 14 of the Operative Christchurch District Plan

Kia ora,

Please find attached the Kāinga Ora submission on Plan Change 14 of the Operative Christchurch District Plan.

Please let us know if you require word documents.

This attachment includes:

- Cover letter
- Appendix 1 – Table of submission points
- Appendix 2 – Metropolitan Centre Zone provisions
- Appendix 3 – Maps of HRZ and Height Variation Control

Please confirm receipt of the submission once received.

Kind Regards,



Principal Development Planner

Development Planning

Urban Planning and Design

Mobile: 021 428 055

Email: lezel.botha@kaingaora.govt.nz

Freephone: 0800 801 601 | Mainline: (021) 428 055 | Kāinga Ora - Homes and Communities

P.O.BOX 2628, WELLINGTON, 6140 | New Zealand Government | www.kaingaora.govt.nz

www.govt.nz - your guide to finding and using New Zealand government services

Any opinions expressed in this message are not necessarily those of Kāinga Ora. This message and any files transmitted with it are confidential, may be legally privileged, and are solely for the use of the intended recipient. If you are not the intended recipient or the person responsible for delivery to the intended recipient, you have received this message in error.

Please:

- (1) reply promptly to that effect, and remove this email, any attachment and the reply from your system;
- (2) do not use, disclose or act on this email in any other way. Thank you.

834

Christchurch City Council

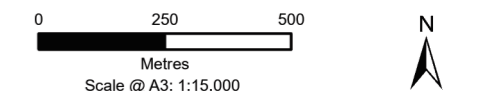
Plan Change 14

Kāinga Ora Submission

City Centre

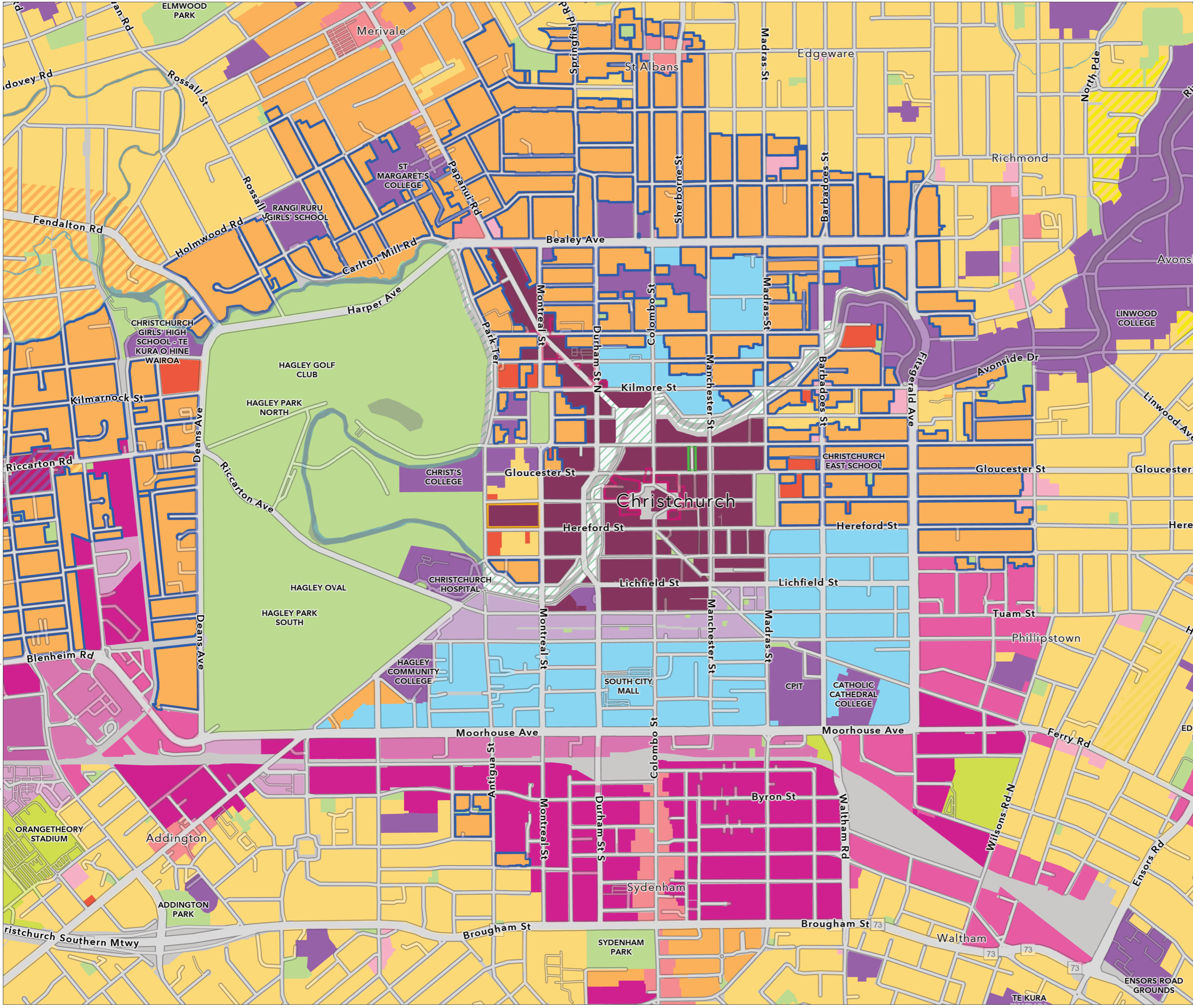
- Kāinga Ora Proposed HVC
- Height Variation Control - 36m
- Kāinga Ora Proposed Zoning
- Metropolitan Centre Zone
- High density residential zone
- Medium density residential zone
- PC14 Zoning
- Central City Mixed Use Zone
- Central City Mixed Use Zone (South Frame)
- City centre zone
- High density residential zone
- Large format retail zone
- Local centre zone
- Medium density residential zone
- Mixed use zone
- Neighbourhood centre zone
- Town centre zone
- Transport
- Specific Purpose
- Industrial General
- Industrial Heavy
- Residential Guest Accommodation
- Residential Medium Density
- Residential Suburban
- Residential Suburban Density Transition
- Open Space Community Parks
- Open Space Metropolitan Facilities
- Open Space Water and Margins
- Commercial Office
- Avon River Precinct (Te Papa Otakaro)
- Commercial Retail Park
- Precinct
- Art Centre Height Precinct
- Cathedral Square and Victoria Street Precinct
- New Regent Street Height Precinct

This map contains data derived in part or wholly from sources other than Kāinga Ora, and therefore, no representations or warranties are made by Kāinga Ora as to the accuracy or completeness of this information. Contains information sourced from Hastings District Council, Hawkes Bay Regional Council, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS. Map intended for distribution as an A3 PDF document.



Revision	1.0
Status	FINAL
Author	JH
Verifier	LB
Date	12/05/2023

Project	Christchurch City Council PC14 Submissions
Client	Kāinga Ora
Discipline	GIS
Drawing No.	GIS-7774461-CCPC14-02



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834

Christchurch City Council

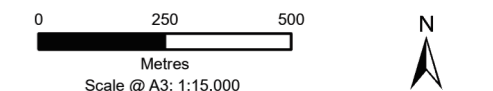
Plan Change 14

Kāinga Ora Submission

Papanui & Merivale

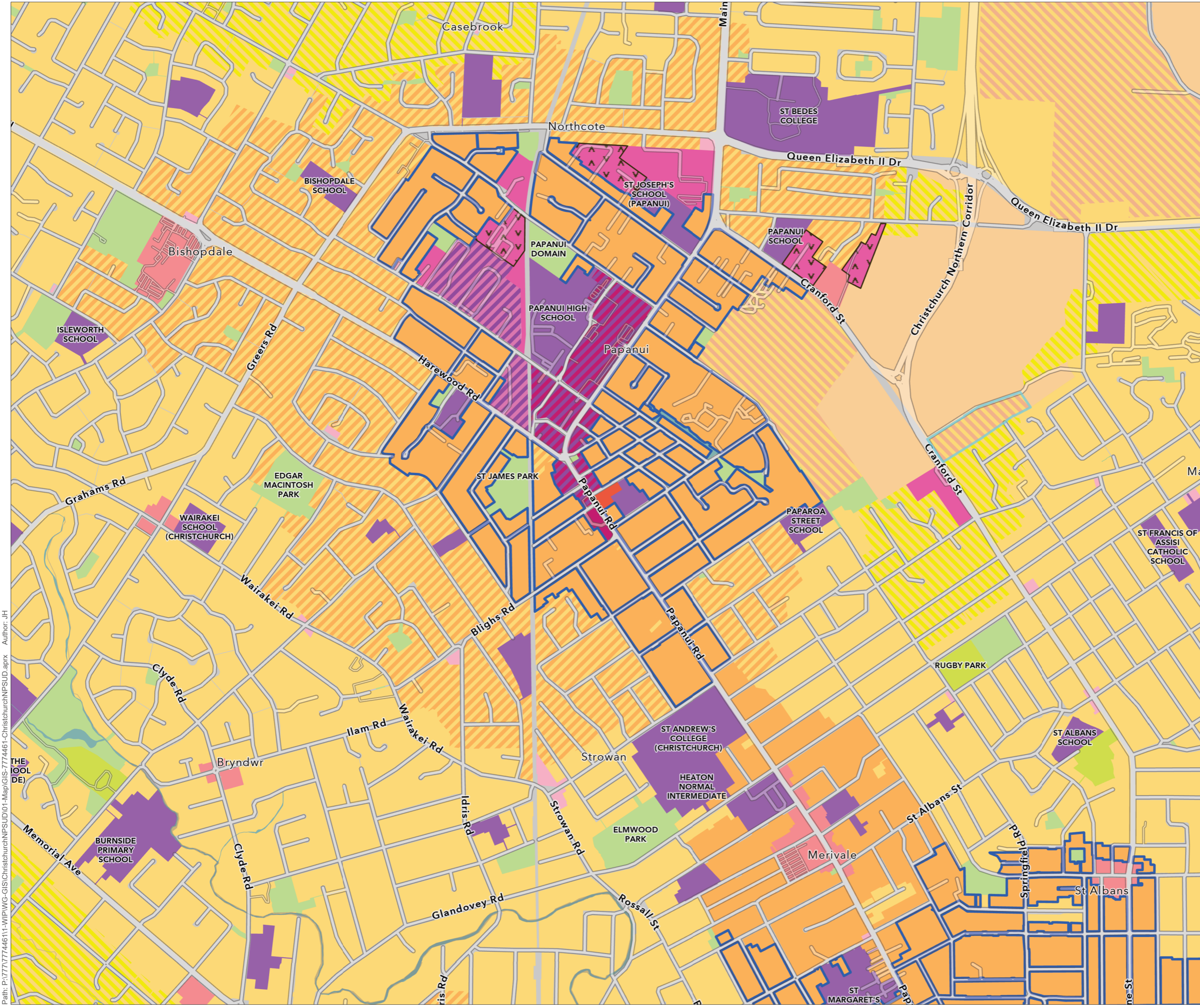
- Kāinga Ora Proposed HVC
- Height Variation Control - 36m
- Kāinga Ora Proposed Zoning
- Metropolitan Centre Zone
- High density residential zone
- Medium density residential zone
- PC14 Zoning
- Future Urban Zone
- High density residential zone
- Large format retail zone
- Local centre zone
- Medium density residential zone
- Neighbourhood centre zone
- Town centre zone
- Transport
- Specific Purpose
- Industrial General
- Rural Urban Fringe
- Residential Guest Accommodation
- Residential Medium Density
- Residential Suburban
- Residential Suburban Density Transition
- Open Space Community Parks
- Open Space Metropolitan Facilities
- Open Space Natural
- Open Space Water and Margins
- Residential New Neighbourhood
- Precinct
- Brownfield Precinct

This map contains data derived in part or wholly from sources other than Kāinga Ora, and therefore, no representations or warranties are made by Kāinga Ora as to the accuracy or completeness of this information. Contains information sourced from Hastings District Council, Hawkes Bay Regional Council, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS. Map intended for distribution as an A3 PDF document.



Revision	1.0
Status	FINAL
Author	JH
Verifier	LB
Date	12/05/2023

Project	Christchurch City Council PC14 Submissions
Client	Kāinga Ora
Discipline	GIS
Drawing No.	GIS-7774461-CCCPC14-01



Path: P:\777774461\1-WIP\WG-GIS\ChristchurchNPSUD\01-Map\GIS-7774461-ChristchurchNPSUD.aprx Author: JH



12th May 2023

Attn: Mark Stevenson
 Planning Manager
 Christchurch City Council
 Po Box 73016
 Christchurch

Submission lodged via email: engagement@ccc.govt.nz

**KĀINGA ORA – HOMES AND COMMUNITIES SUBMISSION ON A NOTIFIED
 PROPOSAL FOR PLAN CHANGE 13 UNDER CLAUSE 6 OF SCHEDULE 1 OF THE
 RESOURCE MANAGEMENT ACT 1991**

This is a submission on Plan Change 13 – Heritage (“PC13”) from Christchurch City Council (“the Council” on the Operative Christchurch District Plan (“the Plan”).

Kāinga Ora does not consider it can gain an advantage in trade competition through this submission. In any event, Kāinga Ora is directly affected by an effect of the subject matter of the submission that:

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

The specific provisions of the proposal that this submission relates to:

The proposed Residential Heritage Area provisions in their entirety.

The Kāinga Ora submission is:

1. Kāinga Ora Homes and Communities (“**Kāinga Ora**”) is a Crown Entity and is required to give effect to Government policies. Kāinga Ora has a statutory objective that requires it to contribute to sustainable, inclusive, and thriving communities that:

- a) Provide people with good quality, affordable housing choices that meet diverse needs; and
 - b) Support good access to jobs, amenities and services; and
 - c) Otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
- 2. Because of these statutory objectives, Kāinga Ora has interests beyond its role as a public housing provider. This includes a role as a landowner and developer of residential housing and as an enabler of quality urban developments through increasing the availability of build-ready land across Christchurch City.
- 3. Kāinga Ora therefore has an interest in PC13 and how it:
 - (a) Gives effect to the National Policy Statement on Urban Development (“**NPS-UD**”) and The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (“**the Housing Supply Act**”);
 - (b) Minimises barriers that constrain the ability to deliver housing development across public housing, affordable housing, affordable rental, and market housing; and
 - (c) Provides for the provision of services and infrastructure and how this may impact on the existing and planned communities, including Kāinga Ora housing developments.
- 4. By way of review, Kāinga Ora considers that having some of the Residential Heritage Area provisions being contained in PC14 and following an IPI process i.e. the built form standards, and other Heritage Area provisions being progressed through a separate PC13, and following a first schedule process i.e. Heritage Area policies has created efficiency issues. The Kāinga Ora submission on Residential Heritage Areas as part of PC13 therefore needs to be read together with our separate submission on PC14.
- 5. The Kāinga Ora submission supports the following parts of PC13:
 - a) The management of historic heritage and the use of qualifying matters for individually listed heritage items, including the identified sites of historic heritage items and their settings (City Centre Zone) – noting that historic heritage is a matter of national significance in Section 6.
- 6. The Kāinga Ora submission opposes in part PC13 for the following reasons:

- a) Kāinga Ora generally supports the protection of areas of historic heritage where the requirements of Section 6 of the Resource Management Act 1991 ('RMA' or 'the Act') are met. However, Kāinga Ora opposes the proposed Residential Heritage Areas ('RHAs') and the Residential Heritage Area Interface overlay ('RHAIO') that are sought to be introduced under PC13 in their entirety. Kāinga Ora does not consider that the proposed RHAs and RHAIOs meet the requirements of Section 6 of RMA to the extent that they should be accorded 'historic heritage' status of 'national' significance.
- b) Kāinga Ora seeks the deletion of any proposals in PC14 that seek amendments as matters pertain to RHAs and RHAIOs, consistent with the relief sought in this PC13 submission. Kāinga Ora considers that the proposed changes across PC13 and PC14 are not qualifying matters, as the assessments in its view, do not meet the requirements under s6, s77I, s77J, s77K, and/or s77L of the RMA.
- c) The RHAs and RHAIOs lack a strong evidence basis and fail to consider unimplemented resource consents.
- d) Kāinga Ora also opposes the proposed RHAs and RHAIOs as being a qualifying matter as proposed in PC14 as we consider the Council has sought to elevate (conflate) special character as historic heritage. Kāinga Ora, therefore oppose the PC13 provisions, contained in section 9.3.6.4 and the associated Schedule B in 9.3.7.3.
- e) Kāinga Ora has particular concern regarding the assessment of areas with a high proportion of Kāinga Ora housing, such as the proposed Piko/Shands character and heritage areas. For example, the benefits of providing a greater number of houses for the most vulnerable members of society, particularly in an area that has historically been used for social housing, are greater than retaining the character associated with existing housing. Consideration should be given if protection does sufficiently outweigh the social cost of the provision warm, dry and safe housing. We do not believe this test has been met.
- f) While State Housing delivery throughout the first Labour Government period is a feature of New Zealand's past, the very nature of state 'public housing' was and remains at its core, to provide housing for those in need. Much of the existing housing stock throughout Christchurch is nearing the end of its serviceable life and located on low-density residential zoned land which does not reflect the significant increase

in New Zealand's population since their original construction, and the relative increase and demand for public housing in the current environment. Securing such areas or groupings of houses (and in some instances identification as 'built heritage') effectively-ascribes heritage value to past urban development patterns that are demonstrably not an efficient use of land, and present a significant loss of opportunity cost for public housing delivery – particularly where the Medium Density Residential Standards ('MDRS') or High Density Residential Zoning ('HDZ') would enable an uplift in housing intensity as a permitted activity.

- g) Kāinga Ora consider that the assessments supporting the identification of RHAs and RHAIOs predominantly focus on physical built form, and do not have sufficient consideration of historical values associated with the place.
- h) Kāinga Ora also oppose the proposed provisions controlling new buildings on sites sharing a boundary with a Residential Heritage Area (Residential Heritage Area Interface). The introduction of this interface further blurs the distinction between s6 RMA matters. These controls are similarly not a universally accepted approach to the management and protection of heritage values, and Kāinga Ora does not support this use.
- i) Kāinga Ora considers that qualifying matters need to be expressed more clearly across PC13 and PC14 to assist with plan administration and interpretation. For example, having some of the Heritage Area provisions being contained in PC14 and following an IPI process i.e. the built form standards, and other Heritage Area provisions being progressed through a separate PC13, and following a first schedule process i.e. Heritage Area policies has created efficiency issues.
- j) Kāinga Ora submits that changes to policies, rules and matters of discretion are necessary to better reflect the requirements and intent of the 'the Housing Supply Act' and NPS-UD. Kāinga Ora considers that PC 13 and PC14 are not currently appropriately framed to recognise that as the character of planned urban areas evolves to deliver a more intensive and compact urban form, amenity values will change. Amendments are sought through both this submission and the submission on PC14 to ensure this is reflected more consistently throughout the provisions, in language that is consistent with the NPS-UD.
- k) The submission seeks such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission above.

7. The changes requested are made to:
- a) Ensure that Kāinga Ora can carry out its statutory obligations;
 - b) Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991;
 - c) Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development;
 - d) Provide clarity for all plan users; and
 - e) Allow Kāinga Ora to fulfil its urban development functions as required under the Kāinga Ora–Homes and Communities Act 2019.

Kāinga Ora seeks the following decision from Christchurch City Council:

That the specific amendments, additions or retentions which are sought as specifically outlined in this submission letter, are accepted and adopted into PC13 and PC14. Including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Kāinga Ora wishes to be heard in support of their submission.

Kāinga Ora seeks to work collaboratively with the Council and wishes to discuss its submission on PC13 to address the matters raised in its submission.



Brendon Liggett
Development Planning Manager
Kāinga Ora – Homes and Communities

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12th May 2023

Attn: Mark Stevenson
Planning Manager
Christchurch City Council
Po Box 73016
Christchurch

Submission lodged via email: engagement@ccc.govt.nz

**KĀINGA ORA – HOMES AND COMMUNITIES SUBMISSION ON A NOTIFIED
PROPOSAL FOR PLAN CHANGE 14 UNDER CLAUSE 6 OF SCHEDULE 1 OF THE
RESOURCE MANAGEMENT ACT 1991**

This is a submission on Plan Change 14 – Housing and Business Choice (“PC14”) from Christchurch City Council (“the Council” on the Operative Christchurch District Plan (“the Plan”).

Kāinga Ora does not consider it can gain an advantage in trade competition through this submission. In any event, Kāinga Ora is directly affected by an effect of the subject matter of the submission that:

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

The specific provisions of the proposal that this submission relates to:

PC14 in its entirety.

This document and the appendices attached is Kāinga Ora submission on PC14.

The Kāinga Ora submission is:

1. Kāinga Ora Homes and Communities (“Kāinga Ora”) is a Crown Entity and is required to give effect to Government policies. Kāinga Ora has a statutory objective that requires it to contribute to sustainable, inclusive, and thriving communities that:
 - a) Provide people with good quality, affordable housing choices that meet diverse needs; and
 - b) Support good access to jobs, amenities and services; and
 - c) Otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
2. Because of these statutory objectives, Kāinga Ora has interests beyond its role as a public housing provider. This includes a role as a landowner and developer of residential housing and as an enabler of quality urban developments through increasing the availability of build-ready land across the Canterbury Region, including Christchurch City.
3. Kāinga Ora therefore has an interest in both PC13 and PC14 and how they:
 - a) Gives effect to the National Policy Statement on Urban Development (“**NPS-UD**”) and The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (“**the Housing Supply Act**”);
 - b) Minimises barriers that constrain the ability to deliver housing development across public housing, affordable housing, affordable rental, and market housing; and
 - c) Provides for the provision of services and infrastructure and how this may impact on the existing and planned communities, including Kāinga Ora housing developments.
4. Kāinga Ora supports the general direction and intent of Plan Change 14, especially to the extent that this suite of plan changes is more enabling of residential and business development capacity compared to the Christchurch City Council Operative District Plan.

In particular, Kāinga Ora supports:

- a) The recognition of the need for well-functioning urban environments (consistent with the direction set out in the National Policy Statement on Urban Development 2020 (“**NPS-UD**”);
- b) The provision of medium density housing in most existing residential areas across the city, which is consistent with the requirements of the Resource Management (Enabling Housing Supply) Amendment Act 2021 (“**the Amendment Act**”);
- c) The recognition of the need to provide sufficient development capacity to meet long term demands for housing and business land;
- d) The need to manage significant risks from natural hazards;
- e) The promotion of a compact urban form and residential intensification in Christchurch City;
- f) The provision for enabling medium to high density residential development within a walkable catchment of the City Centre and larger Commercial Centres; and
- g) The provision of a range of commercial and mixed-use environments which will provide for and support urban development across Christchurch City.

5. The Kāinga Ora submission seeks amendments to PC14 in the following topic areas:

Qualifying Matters

- a) Kāinga Ora could support the qualifying matters, subject to amendments and clarifications as sought in the submission with the exception of: Low Public Transport Accessibility, Key Transport Corridors, Sunlight Access, Residential Heritage Areas, Character Areas, the Christchurch International Airport Noise Influence Area, Industrial Interfaces, and Open Space Areas which are opposed in full by Kāinga Ora for the reasons included in **Appendix 1**.
- b) Kāinga Ora considers that qualifying matters need to be expressed more clearly across PC13 and PC14 to assist with plan administration and interpretation. For example, having some of the Heritage Area provisions being contained in PC14 and following an IPI process i.e. the built form standards. Whilst other Heritage Area provisions are being progressed through a separate PC13, and following a first schedule process i.e. Heritage Area policies has created efficiency issues.

- c) Kāinga Ora opposes the proposed introduction of certain new qualifying matters through the IPI process because doing so in this instance (having regard to the nature of the particular qualifying matters concerned) goes beyond the scope of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. The concerns about the use of the IPI process for this purpose was highlighted in the recent Environment Court's decision of *Waikanae Land Company Limited v Heritage New Zealand Pouhere Tāonga [2023] NZEnvC 056*. As noted in that case, if a Council wishes to implement other changes to its district plan, then there is the usual First Schedule process that can be adopted, with that process containing the appropriate safeguard of a full appeal to the Environment Court.

Residential Heights

- d) Kāinga Ora supports the application of a Medium Density Residential Zone (MRZ) across all relevant residential zones. It also supports the introduction of High Density Residential Zone (HRZ) around the edge of the City Centre and where located in close proximity to larger commercial centres. The extent of HRZ is sought to be increased in the Riccarton area given the scale of the Riccarton commercial centre and proximity to the University of Canterbury activity hub. In addition to the increased spatial extent of HRZ being sought, Kāinga Ora submits that the heights and centre hierarchy be simplified, with greater enablement of taller buildings provided.
- e) Further to this, Kāinga Ora seeks that a Height Variation Control overlay of 36m be applied 1.20km from the edge of the City Centre Zone and the three Metropolitan Centre Zones as sought below.

Metropolitan Centre Zoning

- f) Kāinga Ora seeks the introduction of a new 'Metropolitan Centre Zone (MCZ) in the Plan to replace the Riccarton, Papanui, and Hornby Town Centre Zones to recognise the broader catchment these centre serve, both currently and to account for future growth of the residential catchment. The existing size, scale and function of these centres are such that they merit the application of a MCZ classification, with appropriate objectives, policies and rules framework. A MCZ chapter is sought and is attached in **Appendix 2**. Further, recent and proposed investment in public and active transport modes along the corridors in which these activity centres are located, support the case for a zoning classification reflective of their relative position within the centres hierarchy.

Industrial Interface, Industrial General, and Commercial Mixed Use proposals

- g) Kāinga Ora submits that the Industrial Interfaces qualifying matter and associated policies, and rules are deleted, and that the purported effects are managed, where necessary through noise controls and acoustic and ventilation requirements as opposed to the proposed density controls.
- h) In reviewing the locations that the Industrial Interface qualifying matter applies in the preparation of this submission, Kāinga Ora notes that the current function of many industrial general zone areas, that are located in primarily residential areas, would no longer meet a definition of 'industrial activity'. Kāinga Ora question if this zoning may no longer be appropriate for these locations and if an application of a commercial mixed use zone may be more appropriate; as has been proposed in PC14 for Sydenham.
- i) Similarly, in relation to the rules that have been proposed in commercial mixed use zone boundary changes in areas adjacent to the central city i.e. Sydenham and Phillipstown, Kāinga Ora express concern that the approach taken will not achieve the outcomes sought. Kāinga Ora proposes that the existing zoning remains and a schedule 1 process is followed, including structure planning and use of appropriate planning methods. This may also provide the Council with opportunities to support these changes through the Long Term Plan.

General Feedback

- j) Kāinga Ora submits that changes to policies, rules and matters of discretion are necessary to better reflect the requirements and intent of the 'the Housing Supply Act' and NPS-UD. Kāinga Ora considers that PC14 is not currently appropriately framed to recognise that as the character of planned urban areas evolves to deliver a more intensive and compact urban form, amenity values will change. Amendments are sought to ensure this is reflected more consistently throughout the provisions, in language that is consistent with the NPS-UD.
- k) The Kāinga Ora submission seeks changes to rules to address errors, to align with Schedule 3A of the Housing Supply Act, or to reduce duplication where the standards introduced via Schedule 3A overlap with District Plan provisions that are not proposed to be deleted.

- l) The Kāinga Ora submission seeks amendments to objectives, policies, rules and matters for discretion / assessment criteria - for improved clarity, effectiveness and focus on the specific resource management issue / effect to be addressed. Further, The scope and extent of assessment matters provide such broad discretion that they undermine the 'Housing Supply Act's' intent of a restricted discretionary activity status.
 - m) The submission seeks such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission above and in **Appendix 1**.
6. The changes requested are made to:
- a) Ensure that Kāinga Ora can carry out its statutory obligations;
 - b) Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991;
 - c) Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development;
 - d) Provide clarity for all plan users; and
 - e) Allow Kāinga Ora to fulfil its urban development functions as required under the Kāinga Ora–Homes and Communities Act 2019.
7. The Kāinga Ora submission points and changes sought can be found within Table 1 of Appendix 1 which forms the bulk of the submission.
8. A Metropolitan Centre Zone chapter is sought and included in **Appendix 2**.
9. Mapping changes sought are included in **Appendix 3**.

Kāinga Ora seeks the following decision from Christchurch City Council:

That the specific amendments, additions or retentions which are sought as specifically outlined in this letter and **Appendix 1-3**, are accepted and adopted into PC14, including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Kāinga Ora wishes to be heard in support of their submission.

Kāinga Ora seeks to work collaboratively with the Council and wishes to discuss its

submission on PC14 to address the matters raised in its submission.

A handwritten signature in black ink, appearing to be 'BL', written over a horizontal dotted line.

Brendon Liggett

Development Planning Manager

Kāinga Ora – Homes and Communities

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Appendix 1: Decisions sought on PC14

The following table sets out the amendments sought to the PC14 and also identifies those provisions that Kāinga Ora supports.

Proposed changes are shown as ~~strikethrough~~ for deletion and underlined for proposed additional text.

Table 1

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
Zone Boundaries/ Mapping					
1.		Planning maps	Support in Part	<p>Kāinga Ora support the implementation of a Medium Density Residential Zone (MRZ) over all relevant residential zones. As set out in this submission, Kāinga Ora oppose the Public Transport Accessibility Qualifying Matter (QM) and the Airport Noise Influence Area QM and therefore seek as a consequence of deleting these QMs that the RS and RSDT zoned areas within these QMs be rezoned to MRZ.</p> <p>Kāinga Ora note some ambiguity in the provisions as to whether the land that is subject to the Tsunami Risk QM is intended to be zoned MRZ or RS/ RSDT. Whilst agreeing that a high risk of natural hazards is a legitimate QM, our</p>	<ol style="list-style-type: none"> 1. Retain MRZ over areas where MRZ is proposed in PC14 as notified unless otherwise changed by this submission. 2. Rezone to MRZ areas that are proposed as RS/ RSDT zones under the Public Transport Accessibility and Airport Noise Influence Area QMs. 3. Rezone Lyttelton to MRZ. 4. Rezone Papanui, Riccarton and Hornby Key Activity Centres to Metropolitan Centre Zone (MCZ) from Town Centre Zone and Large Format Retail Zone. 5. Rezone to HRZ areas that are proposed as MRZ within a Local Centre Intensification Precinct and remove the precinct. 6. Retain HRZ over areas where HRZ is proposed in PC14 as notified unless otherwise changed by this submission.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>submission raises concerns with whether the costs and benefits of this QM strike an appropriate balance, and question the appropriateness of using a threshold of a 1:500 year event plus a 1m rise in sea levels as the mapping base. Use of a lower density RS/ RSDT zoning should only be used where the risk of hazards is proven to be high and with a high return period.</p> <p>The areas subject to the 'Local Centre Intensification Precinct' are sought to be rezoned from MRZ to HRZ and the precinct overlay deleted. These areas are ideally located adjacent to medium-sized commercial centres that provide residential activities with easy access to a wide range of services and are also generally well serviced by public transport. As such, a HRZ is considered to be more appropriate and better aligned</p>	<p>7. Remove the Large Local Centre Intensification Precinct and replace with HDZ.</p> <p>8. Extend the boundary of HRZ in the Riccarton area as shown in the maps attached to this submission in Appendix 3.</p> <p>9. Delete the various height/ intensification precincts and replace with a single 'Height Variation Control' precinct to reflect the 36m height limit sought in the submission for the HRZ adjacent to the City Centre, Hornby, Riccarton, and Papanui centres as shown in the maps attached to this submission within Appendix 3.</p> <p>Generally these are:</p> <ul style="list-style-type: none"> - 22m HDZ 1.20km from the edge of the new MCZ and the CCZ. - 36m Height Variation Overlay 400m from the edge of the new MCZ and CCZ.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>with NPS-UD and National Planning Standard outcomes.</p> <p>Kāinga Ora submits that Metropolitan Centres be employed within the centres hierarchy. Kāinga Ora seeks that this covers the existing key activity areas for Riccarton, Papanui, and Hornby.</p> <p>Kāinga Ora support the inclusion of a HRZ in appropriate locations close to the City Centre, Metropolitan and larger suburban commercial centres. The zone boundaries for the HRZ is supported, with the only exception being in the Riccarton area where an extension of the HRZ boundaries are sought to better recognise the proximity of this area to a wide range of commercial services, university activity node, high frequency public transport, cycle ways, and the relief sought in the submission opposing the</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Riccarton Bush, Industrial Interface, Airport Influence Density Precinct, and Piko/Shands heritage area and character area QMs. Noting also the recommendation that Kāinga Ora has suggested in relation to amendments to the Industrial General Zoning at 247 Riccarton Road and 37 Euston Street.</p> <p>Kāinga Ora seeks to rationalise and simplify the height limits applicable to the HRZ, depending on the size of the adjacent commercial centre. Consequential amendments are therefore required to the various height/ intensification precincts to reflect the outcomes sought in the submission.</p>	
Chapter 3 - Strategic Directions					

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
2.	3.3	Objective 3.3.3 – Ngāi Tahu mana whenua	Support in Part	<p>The proposed amendment to clause (a)(ii) is supported.</p> <p>This objective is sought to also include explicit reference to enabling the ability of mana whenua to establish Papakāinga/Kāinga Nohoanga as an important tool in meeting their well-being and prosperity as sought in the amendment.</p>	<p>1. Amend clause (a)(ii) as follows:</p> <p>Ngāi Tahu mana whenua's aspirations to actively participate <u>priorities for their well-being and prosperity are recognised and provided for</u> in the revitalisation of Ōtautahi, <u>including the provision of Papakāinga/Kāinga Nohoanga are recognised</u>; and</p>
3.	3.3	Objective 3.3.4 – Housing bottom lines and choice	Support	Support the proposed reference to Papakāinga/Kāinga Nohoanga as a new clause (b)(ii).	Retain clause (b)(ii) as notified.
4.	3.3	Objective 3.3.7 – Well functioning urban environment	Support in Part	<p>Clause (a) implements legislative requirements and is supported. The balance of the objective is likewise supported, with the exception of clause (a)(i)(A) which confuses urban form with landscape outcomes and adds little meaningful value to the objective.</p> <p>Clause (a)(E)(iii) relating to mana whenua must include</p>	<p>2. Retain the objective as notified, except for:</p> <p>Delete clause (a)(i)(A) <u>Contrasting building clusters within the cityscape and the wider perspective of the Te Poho-o-Tamatea/the Port Hills and Canterbury plains; and</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>explicit reference to Papakāinga/Kāinga Nohoanga.</p> <p>It is noted that the clause numbering/ formatting is unclear.</p>	<p>Amend clause (a)(E)(iii) as follows:</p> <ol style="list-style-type: none"> 1. The cultural traditions and norms of Ngāi Tahu mana whenua, <u>including the provision of Papakāinga/Kāinga Nohoanga</u> 2. Update clause numbering.
5.	3.3	Objective 3.3.8 – Urban growth, form and design	Support in Part	<p>In line with our submission raising concerns that the proposed character area QM does not meet s32 requirements, in the event that the character area provisions are deleted, then existing clause (a)(ii) is also sought to be deleted.</p> <p>Similarly in line with our submission raising consistency of heights in local centres, and in line with concerns of the public transport access qualifying matter clause (a)(iv.)(A) is sought to be amended. The other amendments sought in PC14 to this objective are supported.</p>	<ol style="list-style-type: none"> 1. Retain objective as notified, except for the deletion of existing clause (a)(ii): Has its areas of special character and amenity value identified and their specifically recognised values appropriately managed; and 2. Amend clause (a)(iv.)(A) as follows: <u>in and around the Central City, Key Activity Centres (as identified in the</u> <u>Canterbury Regional Policy Statement), Town Centre, and larger Local neighbourhood</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<u>centres, and nodes of core public transport routes; and</u>
6.	3.3	Objective 3.3.10 – Natural and cultural environment	Oppose	In line with our submission seeking the deletion of the tree canopy financial contribution rules, the related proposed reference to tree canopy in the strategic objectives is also opposed.	Delete proposed clause (a)(ii)(E): Tree canopy cover in areas of residential activity that maintains and enhances the city's biodiversity and amenity, sequesters carbon, reduces stormwater runoff, and mitigates heat island effects; and
7.	3.3	Objective 3.3.13 - Infrastructure	Oppose	In line with our submission seeking the deletion of the Airport Influence Density Precinct and our concern that the Qualifying Matter does not meet s32 requirements, amend Clause (b.)(iii.)	Delete clause (b.)(iii.).
Chapter 6 – Qualifying Matters					
8.	Sites of Ecological Significance	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards	Support	Kāinga Ora support the Sites of Ecological Significance, the Outstanding and Significant Natural Features, and the Sites of Cultural Significance qualifying matters, noting these	<ol style="list-style-type: none"> 1. Retain the Sites of Ecological Significance qualifying matter. 2. Retain the Outstanding and Significant Natural Features qualifying matter.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	<ul style="list-style-type: none"> Outstanding Natural Features and Landscapes Sites of Cultural Significance (Wāhi Tapu / Wāhi Taonga, Ngā Tūranga Tūpuna, Ngā Wai and Belfast Silent File) 	<p>and/or intensification enabled under Policy 3.</p> <p>9.1.4.1.1 P1 Indigenous vegetation clearance.</p> <p>9.1.4.1.3 RD3 – RD6 Indigenous vegetation clearance.</p> <p>9.1.4.1.5 NC1 and NC3 Indigenous vegetation clearance.</p> <p>8.5.1.3 RD11 Subdivision of land.</p> <p>8.9.2.3 RD5 Earthworks.</p> <p>9.2.4.1 Table 1(a) – (d), (i), (o) – (s) Outstanding natural features and landscapes.</p> <p>9.5.4.1.3 RD3 – RD6 Wāhi Tapu / Wāhi Taonga.</p>		<p>are all relevant matters of national significance in Section 6.</p> <p>It is also noted that there is very little overlap between Sites of Ecological Significance and Outstanding Natural Features and Landscapes with existing residential zones.</p>	<p>3. Retain the Sites of Cultural Significance qualifying matter.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		8.5.1.3 RD11 Subdivision of land. 8.9.2.3 RD5 Earthworks.			
9.	Slope Hazard Areas	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3. 5.6.1 Slope Instability Management Area	Support	Kāinga Ora support the management of significant risks from natural hazards as a qualifying matter (in appropriate circumstances), noting that it is a matter of national significance in Section 6. As slope hazards are less dynamic and have greater certainty as to their risk over time than flooding (submitted on below) and are not subject to constant change through hazard mitigation works, Kāinga Ora supports the Slope Hazard Areas qualifying matter.	Retain the Slope Hazard Areas qualifying matter.
10.	High Flood Hazard Management Area	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards	Support in Part	Kāinga Ora supports a risk-based approach to the management of natural hazards, however, opposes the inclusion of further hazard	1. Amend the provisions to remove / delete the mapped Hazard Management Areas from within the District Plan and instead hold this information in non-statutory GIS maps.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	Coastal Hazard Management Areas	and/or intensification enabled under Policy 3.		areas within the maps as part of the District Plan.	2. Reduce the Tsunami Management Area to a 1:100 year hazard.
		5.4.5 Flood Ponding Management Areas		Including Flood Hazard Areas in the District Plan ignores the dynamic nature of such hazards. Kāinga Ora accepts that it is appropriate to include rules in relation to these hazards but seeks that the rules are not linked to static maps.	3. Amend and make consequential changes to give effect to this submission.
		5.4.6 High Flood Hazard Management Areas			
		5.2.2.5.1 Managing development in Qualifying Matter Coastal Hazard Management Areas 5.4A.1 – 5.4A.6 Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area.		Other councils across the country adopt a set of non-statutory hazard overlay maps which operate as interactive maps on the respective Council's 'Geo Maps' website – a separate mapping viewer to the statutory maps. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 process under the RMA. Kāinga Ora notes that there is no formal requirement for hazard	
	Tsunami Management Area	5.2.2.5.2 Managing development within the Qualifying Matter Tsunami Management Area			
		5.4A.1 – 5.4A.6 Rules – Qualifying Matter Coastal Hazard Management Areas			

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		and Qualifying Matter Tsunami Management Area		<p>maps to be included within a district plan.</p> <p>Kāinga Ora also has concerns that the proposed policy approach relating to the Tsunami Management Area is too conservative, noting that Policy 24 of the NZCPS requires identification of areas in the coastal environment that are potentially affected by coastal hazards (including tsunami) over at least 100 years.</p> <p>Kāinga Ora also considers that the Council's intent to retain Residential Suburban / Residential Suburban Density Transition zoning in the Tsunami Management Area is disproportionate based on the modelled return period.</p>	
11.	Historic Heritage, Residential Heritage Areas, and Residential	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium	Support Historic Heritage.	Kāinga Ora generally supports the protection of areas of historic heritage where the requirements of Section 6 of the Resource Management Act	Delete the Residential Heritage Area qualifying matter and all proposed provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	Heritage Area Interface.	<p>Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.3.2.3 Building height - Residential Heritage Areas.</p> <p>14.5.3.2.7 Number of Residential Units Per Site - Residential Heritage Areas.</p> <p>14.5.3.2.8b, 8c Setbacks - Residential Heritage Areas.</p> <p>14.5.3.2.9 Building Coverage - Residential Heritage Areas.</p> <p>14.5.3.2.10c Outdoor living space - Residential Heritage Areas.</p>	Oppose Residential Heritage Areas.	<p>1991 ('RMA' or 'the Act') are met. However, Kāinga Ora opposes the new proposed Heritage Areas ('HAs') that are sought to be introduced under PC13 and PC14 in their entirety.</p> <p>Kāinga Ora does not consider that the proposed HAs meet the requirements of Section 6 of RMA to the extent that they should be accorded 'historic heritage' status of 'national' significance.</p> <p>Therefore, if these areas are considered to manage character (s7 RMA), rather than protect heritage, Kāinga Ora considers that a more nuanced assessment of costs and benefits applies to areas with a high proportion of Kāinga Ora housing, such as the proposed Piko/Shands character and heritage areas (i.e. the benefits of providing a greater number of houses for the most vulnerable members of society,</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>particularly in an area that has historically been used for social housing, are greater than retaining the character associated with existing housing per se, and therefore the character or heritage values of such locations must be carefully weighed to test the heritage values are existent and sufficiently so that they outweigh the social costs of lost development opportunity. We do not believe this test has been met.</p> <p>A more nuanced assessment of costs and benefits is likewise required for heritage areas in locations that are otherwise ideally located for further intensification, such as the heritage areas within and adjacent to the central city/ Four Avenues. Piko/ Shands is located in close proximity to both Riccarton and Church Corner commercial centres as well as an emerging high frequency public transport</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>corridor along Riccarton Road and a new major cycle way network. Were it not for the heritage and character area overlays, the Piko/ Shands area would merit a High Density zoning/ height limits.</p> <p>The imposition (costs) of character controls in locations that would otherwise suit high density housing must therefore be greater than the costs applying to character areas more generally. It follows that the benefits of such regulation and the identification of these areas as Qualifying Matters must therefore be greater than the benefits generally in order to justify additional regulation.</p> <p>It is further noted that having some of the Heritage Area provisions being contained in PC14 and following an IPI process i.e. the built form standards, and other Heritage Area provisions being progressed through a separate</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>PC13, and following a first schedule process i.e. Heritage Area policies has created efficiency issues.</p> <p>Consistency is sought with the Kāinga Ora submission on Plan Change 13 ("PC13"), which Kāinga Ora opposed the approach of establishing 'Historic Heritage Areas' in its entirety.</p> <p>Kāinga Ora is seeking the spatial application of residential zones to be applied across the City, regardless of the nature and extent of the current and proposed 'Heritage Areas' set out by Council in PC13. Kāinga Ora seeks the deletion of any proposed changes in PC14 that seek amendments to historic heritage and special character, consistent with the relief sought in PC13.</p> <p>Kāinga Ora considers that the proposed changes across PC13 and PC14 are not</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				qualifying matters, as the assessments in its view, do not meet the requirements under s6, s77I, s77J, s77K, and/or s77L of the RMA.	
12.	Significant and Other Trees (excluding those not identified as Qualifying Matters).	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>9.4.4.1.1 P1 – P12 Tree pruning, felling, earthworks.</p> <p>9.4.4.1.2 C1 Tree maintenance.</p> <p>9.4.4.1.3 RD1 – RD8 Tree pruning, felling, earthworks.</p> <p>9.4.4.1.4 D1 – D2 Tree pruning, felling 9.4.7.1 Appendix – Schedules of significant trees.</p>	Support in Part	<p>Kāinga Ora support the Significant and Other Trees qualifying matter.</p> <p>The rules in Chapter 9 of the District Plan sufficiently recognise and provide for the management of notable trees. Such rules provide a suitable framework for considering new buildings in proximity to notable trees, or their removal.</p> <p>Rule 9.4.4.1.1 P12 triggers the need for resource consent for earthworks within 5m of a street tree, however consent is always granted provided the works are undertaken by, or under the supervision of, a works arborist. The relief sought would reduce costs and the reliance on the resource consent process and is therefore more consistent</p>	<ol style="list-style-type: none"> 1. Retain Significant and Other Tree Qualifying Matter. 2. Amend Rule 9.4.4.1.1 P12 as follows: <p>Rule 9.4.4.1.1 P12 - Activities shall be undertaken by, or under the supervision of, a works arborist. employed or contracted by the Council or a network utility operator.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				with Objective 3.3.2.	
13.	Waterbody setbacks	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>6.6.4 City and Settlement Water Body Setbacks 6.6.4.1 – 6.6.4.4 Activities within water body setbacks</p>	Support in Part	<p>Section 6 seeks the preservation of rivers and their margins and their protection from inappropriate subdivision, use and development. Similarly, Section 6 also recognises and provides for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga.</p> <p>Kāinga Ora is supportive of these Section 6 matters being identified as a qualifying matter. However, where the identified waterbodies do not meet a Section 6 threshold, such as for 'Environmental Asset Waterways' and 'Network Waterways' use of waterway setbacks as a qualifying matter, Council needs to demonstrate why development that is otherwise permitted under</p>	Remove 'Environmental Asset Waterways' and 'Network Waterways' as qualifying matter, unless a site by site assessment has been undertaken that demonstrates why development that is otherwise permitted under MDRS is inappropriate.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>MDRS is inappropriate, for every specific waterway (and adjacent site) where a qualifying matter is proposed.</p> <p>The existing provisions in Chapter 6.6 of the District Plan are sufficient.</p>	
14.	Public Open Space areas; and Ōtākaro Avon River Corridor.	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>18.4 to 18.96.1A Qualifying matters</p> <p>13.14 Specific Purpose (Ōtākaro Avon River Corridor) Zone – All provisions, including Appendix 13.14.6.2 specifying alternative zone provisions applicable to privately owned properties within the zone</p>	Oppose	<p>Kāinga Ora considers this qualifying matter is unnecessary and seek that it is deleted.</p> <p>While the use of areas for open space purposes is identified as a qualifying matter under RMA s77O(f), the areas zoned Open Space are owned by CCC and many are administered under the Reserves Act 1977. Council ownership, and Open Space zoning, makes it unlikely that these areas will be developed for medium density housing and such development would also be contrary to the purposes for which these sites were reserved. Further, the Housing Supply Act only requires CCC</p>	Delete the Open Space (recreation zone) qualifying matter and any relevant provisions proposed in its entirety.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		15.4.3.2.1 Maximum building height; Appendix 15.15.1 Town Centre Zone (Belfast/Northwood) Outline Development Plan		to incorporate MDRS into every relevant residential zone (not Open Space Zone). The s77O(f) matter is noted as being relevant for other councils where their District Plan does not include an Open Space zone and instead reserves often have a residential zoning. As with the Open Space Zones, Kāinga Ora note that the Ōtākaro 'red zone' area has been subject to detailed place-based assessment, with large-scale residential development not anticipated in this area.	
15.	Residential Character Areas	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3. 14.5.3.1.1 P4 Conversion to two residential units –	Oppose in Part	Kāinga Ora support, in principle, the management of character as a qualifying matter. However, Kāinga Ora does not consider appropriate justification has been provided for the proposed new or extended 'character areas' set out in PC13 and PC14 to demonstrate that they contain specific characteristics that	<ol style="list-style-type: none"> 1. Delete all new or extended character areas as qualifying matters and undertake further analysis to determine the exact values of the resources that the Council seeks to manage in the District Plan. 2. For existing character areas retain the controlled activity status for new buildings that exists in the Operative Plan - Rule 14.5.3.1.2 C1.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>Character Area Overlays</p> <p>14.5.3.1.2 C1 Character Area Overlays – new residential units to rear</p> <p>14.5.3.1.3, RD6, RD14 Area-specific rules and character overlays.</p> <p>14.5.3.2.3 Building height – Character Area Overlays.</p> <p>14.5.3.2.5 – 14.5.3.2.14 Built form rules – Character Area Overlays.</p> <p>14.15.27 Matters of discretion - Character Area Overlays.</p> <p>14.8.1.1 P18 – Conversion to two residential units –Lyttelton Character Area.</p> <p>14.8.3.1.1 P5 – Minor residential unit in Lyttelton Character Area or Lyttelton Residential Heritage Area.</p>		<p>make the level of development provided by the MDRS or policy 3 inappropriate in the area. Further, they blur the line between the protection of historic heritage values as set out under s6(f) of the RMA, and amenity values as set out under section 7 of the RMA. This is especially the case where both character and heritage area overlays apply to the same geographic area.</p> <p>Kāinga Ora questions the planning method and assessment undertaken to determine the proposed provisions.</p> <p>Kāinga Ora considers that any such provisions and values identified should be ‘managed’ rather than ‘protected’ in the District Plan. Kāinga Ora seeks the provisions as proposed are deleted and that further analysis is undertaken to determine the exact values of the resources that the Council</p>	<p>14.5.3.2.3 Building height – Character Area Overlays, and</p> <p>14.5.3.2.5 – 14.5.3.2.14 Built form rules – Character Area Overlays.</p> <p>3. In the event that the Character Area qualifying matter remains, explicit provision is sought for the ability to develop Papakāinga/Kāinga Nohoanga, noting that local Rūnanga have purchased the former Lyttelton West School Site.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>14.8.3.1.2 C3 – New residential unit to rear Lyttelton Character Area.</p> <p>14.8.3.1.3 RD3 – Lyttelton Character Overlay – new buildings, alterations etc.</p> <p>14.8.3.1.3. RD5-RD7, RD9 – not meeting Lyttelton Character Area or Residential Heritage Area built form rules</p> <p>14.8.3.1.3 RD8, RD10 –not meeting Lyttelton Character Area built form rules.</p> <p>14.8.3.1.3 RD11 - Lyttelton Character Area or Lyttelton Residential Heritage Area – not meeting minor residential units rules.</p> <p>14.8.3.2.2 –14.8.3.2.6 Built form rules – Lyttelton Character Area or Lyttelton Residential Heritage Area.</p> <p>14.8.3.2.7 – 14.8.3.2.12 -Built form rules – Lyttelton Character Area only.</p>		seeks to manage in the District Plan.	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
16.	Electricity Transmission Corridors.	<p>6.1A Qualifying matters.</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.4.1.5 NC6 – NC7 National Grid transmission and distribution lines.</p> <p>14.5.1.5 NC2 – NC3 National Grid transmission and distribution lines.</p> <p>14.7.1.5 NC2 National Grid transmission and distribution lines.</p> <p>14.12.1.5 NC1 – NC2 National Grid transmission and distribution lines.</p>	Support	Kāinga Ora support this qualifying matter noting that the qualifying matter only relates to the National Grid Transmission Lines (nationally significant infrastructure) in accordance with s77I(e) and no other lesser category of line.	Retain Electricity Transmission Corridors qualifying matter only to the extent of the corridor as defined in the NES ET.
17.	Airport Noise Influence Area	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the</p>	Oppose in Part	Kāinga Ora seeks that the Airport Noise Influence Area qualifying matter be deleted thus allowing all existing	Delete this qualifying matter and all proposed provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>Safe or efficient operation of nationally significant infrastructure (Christchurch Airport)</p> <p>14.4.1 – 14.4.4, 14.13, 14.14 Low Density Residential Airport Influence Zone and Airport Influence Density Precinct.</p>		<p>residential zoned land within the Airport Noise Influence Area to be zoned Medium Density Residential as per the direction in the Act.</p> <p>While Kāinga Ora agrees that it is appropriate to protect strategic infrastructure (including Christchurch International Airport) from reverse sensitivity effects, it does not consider that restricting density under the Airport Noise Influence Area is necessary to avoid reverse sensitivity effects. Further, Kāinga Ora considers that the health, safety and amenity of existing and future residents living within the Airport Noise Influence Area would be appropriately maintained if the land was zoned Medium Density Residential. Any new buildings and additions to existing buildings located within the 55 dB Ldn air noise contour or the 55 dB Ldn engine testing contour would continue to be</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				subject to the acoustic insulation standards set out at Rule 6.1.7.2.2 (Activities near Christchurch Airport) in the District Plan as required by Policy 6.1.2.1.5 b. ii. (Airport noise).	
18.	Lyttelton Port Influence Overlay	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.8.3.1.1 – 14.8.3.1.5 Area-specific rules - Lyttelton Port Influences Overlay</p>	Support	<p>Kāinga Ora support the Lyttelton Port Influence Overlay qualifying matter noting that the qualifying matter only relates to nationally significant infrastructure in accordance with s771(e).</p> <p>Kāinga Ora does not oppose the noise insulation standards.</p> <p>Kāinga Ora notes that the geographic area covered by the Port Influence Overlay is small and overlaps with a proposed Heritage Area. Furthermore, the Port is obliged to pay for the acoustic insulation of existing dwellings within the contour (Rule 13.8.4.2.7), so the scale, plus the costs and benefits, are markedly different between the</p>	Retain Lyttelton Port qualifying matter.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Port Influence Overlay and the Airport Noise Influence Area qualifying matter.	
19.	NZ Rail Network Interface Sites.	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>6.1.7 Activities near infrastructure.</p> <p>14.4.1.3 RD28 and 14.4.2.7 Setback from rail corridor.</p> <p>14.5.1.3 RD12 and 14.5.2.7 Setback from rail corridor.</p> <p>14.8.1.3 RD16 and 14.8.2.4 Setback from rail corridor.</p>	Oppose	Kāinga Ora considers that the standard internal boundary setback for zones is appropriate.	Delete NZ Rail Network Interface Sites qualifying matter.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		14.12.1.3 RD13 and 14.12.2.5 Setback from rail corridor.			
20.	Radio Communication Pathways for the Justice and Emergency Services Precinct.	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>6.12 Radio communication Pathway Protection Corridors.</p>	Neutral	Kāinga Ora recognise the need to maintain radio communication for emergency services, and does not provide any further feedback.	Note: Table 1 in Chapter 6.1A references an abbreviation rather than the qualifying matter rule reference.
21.	Vacuum Sewer Wastewater Constraint Areas	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>8.9A Waste water constraint areas</p>	Support in Part	<p>Kāinga Ora recognise the need to ensure sufficient infrastructure is available to service developments.</p> <p>The Restricted Discretionary Activity status and the relevant matters of discretion are generally considered appropriate, however an additional matter of discretion that provides a consenting pathway for intensification in</p>	<p>Amend as follows:</p> <p>The Council's discretion shall be limited to the following matters:</p> <p><u>c. The ability to connect into any nearby non-vacuum wastewater system.</u></p> <p><u>d. The extent to which alternative waste water solutions are available that do not adversely affect the</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				these areas where infrastructure constraints can be addressed by alternative means is required.	<u>function of the Council's waste water systems.</u>
22.	Sunlight Access	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.2.6 – Height in relation to boundary,</p> <p>14.6.2.2 – Height in relation to Boundary, 14.15.2 – Diagram D.</p>	Oppose	Kāinga Ora oppose 'Sunlight Access' being a qualifying matter and considers this to be inconsistent with the requirements of Section 77L.	Delete the Sunlight Access qualifying matter and all associated provisions.
23.	Low Public Transport Accessibility.	<p>14.1 Introduction,</p> <p>14.2 Objectives and Policies, 14.3 How to interpret and apply the rules, 14.4 Rules - Residential Suburban Zone and Residential Suburban Density Transition Zone, 14.7</p>	Oppose	Kāinga Ora opposes the 'Low Public Transport Accessibility' being a qualifying matter and considers this to be inconsistent with the requirements of Section 77L.	<ol style="list-style-type: none"> 1. Delete the Low Public Transport Accessibility Qualifying Matter and all associated provisions. 2. Rezone all areas subject to this QM to MRZ.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		Rules - Residential Hills Zone, 14.8 Rules - Residential Banks Peninsula Zone, 14.15 Rules - Matters of control and discretion, 14.16 Rules - Appendices – all as they apply to areas that are zoned Residential Suburban or Residential Hills, or in Lyttelton zoned Residential Banks Peninsula.		Kāinga Ora is particularly concerned to note the large areas with inadequate services in the eastern parts of the District, where the lack of such services has the potential to exacerbate existing social inequalities.	
24.	Industrial Interface	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>8.6.15 North Halswell – additional standards 8.7.13 North Halswell – additional matters – Medium and High Density Residential Zones in North Halswell 8.8.17 North Halswell – additional matters of discretion.</p>	Oppose	<p>Kāinga Ora considers that effects from industrial activities should first be mitigated at the source.</p> <p>The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p>	Delete the Industrial Interface Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be appropriate with the benefits of the QM not outweighing the costs.	
25.	Riccarton Bush Interface	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.2.3 Medium Density Residential Zone – Building height.</p> <p>14.4.2.3 Residential Suburban Zone – Building height.</p>	Oppose	<p>Kāinga Ora considers that the existing long-established Operative Plan rules requiring a 10m building and earthworks setback from boundaries with the Bush are appropriate for managing potential interface issues/ impacts on tree health. The retention of the existing setback is quite different from the proposed QM which extends across roads and goes some distance from the Bush itself.</p> <p>The area around Riccarton Bush is ideally located for supporting a High Density</p>	<ol style="list-style-type: none"> 1. Delete the Riccarton Bush Interface Qualifying Matter and all associated provisions. 2. The existing tree setbacks in Chapter 9.4 are retained.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Residential Zone given its close proximity to a Metropolitan centre, cycleways, high frequency bus routes, and the large university activity hub.	
26.	Key Transport Corridors – City Spine	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.2.18 – Spine Road setbacks.</p> <p>14.6.2.17 - Spine road setbacks.</p> <p>15.4.2.10 – spine corridor setbacks.</p> <p>15.5.2.10 Setback from corridor.</p>	Oppose	<p>Kāinga Ora oppose the ‘City Spine’ being a qualifying matter and considers this to be inconsistent with the requirements of Section 77L.</p> <p>The associated rules require buildings and outdoor living spaces to be set back from spine road corridors in both residential and commercial zones. In commercial zones there is a direct conflict in urban design outcomes (and rules) where the Key Pedestrian Frontage rules require buildings to be built up to the road boundary in order to deliver good urban design outcomes and facilitates a continuous street edge (often with veranda cover for pedestrians).</p>	Delete the Key Transport Corridors – City Spine Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		15.6.2.11 Setback from corridor. 15.8.2.13 Setback from corridor. 15.10.2.10 Setback from corridor. 15.12.2.13 Setback from corridor. 15.14.5.3 Matters of Discretion.		<p>It is understood that the intention of the rule is to enable road widening in the future to accommodate public rapid transit. If Council's intention is to acquire land in the future to facilitate public works then it should use the designation powers available to it.</p> <p>Given the highly developed nature of these existing corridors with lengthy sections of commercial property built to the road boundary, it is unclear how any corridor-long road widening will occur without major land acquisition and demolition.</p>	
27.	Sites of historic heritage items and their settings (City Centre Zone) - Cathedral Square, New Regent Street, the Arts Centre.	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.	Support	Kāinga Ora support the management of Historic Heritage as a qualifying matter, noting that Cathedral Square, New Regent Street and the Arts Centre contain individually listed heritage items and are within identified heritage settings. This is a matter of	Retain sites of historic heritage items and their settings (City Centre Zone) - Cathedral Square, New Regent Street, the Arts Centre.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		15.11.1.2 C2 Works at 100 Cathedral Square 15.11.1.3 RD9 Works at 100 Cathedral Square 15.11.1.3 RD11 buildings on New Regent Street, the Arts Centre, and in the Central City Heritage Qualifying Matter and Precinct 15.11.2.11 Building height in area-specific precincts		national significance in Section 6.	
28.	Belfast/Northwood Outline Development Plan Features	15.4.3.2.1 Maximum building height; Appendix 15.15.1 Town Centre Zone (Belfast/Northwood) Outline Development Plan.	Neutral	Kāinga Ora does not have a view on this site-specific qualifying matter.	
Chapter 5 – Natural Hazards					
29.	5.5	Policy 5.2.2.5.1 – Managing development in Qualifying Matter Coastal Hazard Management Areas	Support in Part	Kāinga Ora support the management of significant risks from natural hazards as a qualifying matter (in appropriate circumstances), noting that it is a matter of national significance in Section 6.	Amend the policy as follows: Within the following Qualifying Matters, development, subdivision and land use that would provide for intensification of any site shall be avoided, unless the risk is from coastal inundation and a site specific assessment demonstrates the

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Kāinga Ora generally supports the risk based approach to the management of natural hazards but considers that the avoidance of intensification should be reserved to high risk from coastal inundation.</p> <p>Rule 5.4A.4 D1 requires resource consent for new buildings, other than accessory buildings, extensions etc, in areas shown on the planning maps as Qualifying Matter Coastal Hazard Medium Risk Management Area as a Discretionary Activity. Even with a site specific assessment however, Policy 5.2.2.5.1 seeks to avoid this.</p>	<p>risk is medium, low or very low based on thresholds defined in Table 5.2.2.5.1a below:</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
30.	5.5	Policy 5.2.2.5.2 - Managing development within Qualifying Matter Tsunami Management Area	Support in Part	<p>Kāinga Ora considers that the Council's intent to retain Residential Suburban / Residential Suburban Density Transition zoning in the Tsunami Management Area is disproportionate based on the modelled return period. This may be appropriate for 1:100 or 1:200, especially if such areas are also covered by high flood and/or coastal inundation risk overlays.</p> <p>Kāinga Ora seeks changes to the wording of Policy 5.2.2.5.2 to provide certainty of the outcomes intended, noting that the rule allows for up to four residential units to be constructed on these sites (Rule 14.4.1.1 P4, P5 and P6) so there is a disconnect between the use of the term 'avoid' and what the provisions would allow for as a permitted activity.</p>	<ol style="list-style-type: none"> Amend Policy 5.2.2.5.2 as follows: Within the Tsunami Management Area Qualifying Matter, avoid discourage development, subdivision and land use that would provide for intensification of any site, unless the risk to life and property is acceptable. Alternatively the Policy framework could be retained if the geographic extent of the QM matter is better aligned with a 1:100 return period or covers an area reflective of the Tsunami Inundation area identified by the Greater Christchurch Partnership as part of its consultation on the Greater Christchurch Spatial Plan.
31.	5.4	Flood hazard provisions	Support in Part	Kāinga Ora seek that spatial identification of flood hazard	<ol style="list-style-type: none"> Amend the provisions to remove / delete the mapped Hazard

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				management areas are made available through a set of non-statutory maps, which would operate as interactive maps on the Council's GIS website – thereby operating as a separate mapping viewer to the statutory District Plan maps. This approach is different to that of the traditional means of displaying hazard overlays on district plan maps and reflects that these maps do not have regulatory effect. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 Resource Management Act 1991 process. Kāinga Ora notes that this is an approach taken by other Councils around the country.	<p>Management Areas from within the District Plan and instead hold this information in non-statutory GIS maps.</p> <ol style="list-style-type: none"> 2. Delete all references to maps within the District Plan. 3. Undertake any consequential amendments to zones, overlays, precincts, and qualifying matters to reflect the relief sought in the submission.
32.	5.4.1.3	Exemptions for daylight recession planes in the Flood Management Area	Support in Part	Kāinga Ora seeks for the applicable daylight recession planes in all residential zones to	Amend rules as follows:

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>be determined as if the ground level at the relevant boundary was the minimum floor level set in the activity specific standards in Rule 5.4.1.1, or natural ground level, whichever is higher.</p>	<p>5.4.1.3 a. For P1 and P2 in Rule 5.4.1.1, the applicable daylight recession plane in residential zones (other than in the Medium Density Residential Zone and High Density Residential Zone) shall be determined as if the ground level at the relevant boundary was the minimum floor level set in the activity specific standards in Rule 5.4.1.1, or natural ground level, whichever is higher.</p> <p>5.4.1.3b. For P3 and P4 in Rule 5.4.1.1, the applicable daylight recession plane in residential zones (other than in the Medium Density Residential Zone and High Density Residential Zone) shall be determined as if the ground level at the relevant boundary was the minimum floor level specified in the Minimum Floor Level Certificate issued under Rule 5.4.1.2, or natural ground level, whichever is higher.</p> <p>5.4.1.3 c</p> <p>viii. Rule 14.5.2.6 Height in relation to boundary – Medium Density Residential Zone</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					ix. Rule 14.6.2.2 Height in relation to boundary – High Density Residential Zone
33.	5.4A	Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area	Oppose in Part	Kāinga Ora seek that spatial identification of coastal hazard management areas be made available through a set of non-statutory maps, which would operate as interactive maps on the Council's GIS website – thereby operating as a separate mapping viewer to the statutory District Plan maps. This approach is different to that of the traditional means of displaying hazard overlays on district plan maps and reflects that these maps do not have regulatory effect. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 Resource Management Act 1991 process. Kāinga Ora notes that this is an approach	<ol style="list-style-type: none"> 1. Delete all references in all rules in this section that refer to maps. 2. Include a rule to provide for a Controlled Activity to subdivide within the Tsunami Management Area. 3. Amend Rule 5.4A.5 NC3 as follows: <ol style="list-style-type: none"> a. Development, subdivision and land use that would provide for residential intensification of any site within the Qualifying Matter Tsunami Management Area except that permitted or controlled in Rules 14.4.1 and 14.4.2. 4. Any consequential amendments to zones, overlays, precincts, and qualifying matters to reflect the relief sought in the submission.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>taken by other Councils around the country.</p> <p>Rule 5.4A.5 NC3 makes development, subdivision and land use that would provide for residential intensification of any site within the Qualifying Matter Tsunami Management Area except that permitted or controlled in Rule 14.4.1 a non-complying activity.</p> <p>Rule 14.4.2 deals with controlled activities so the rule outlined above needs to be amended to reference Rule 14.4.2.</p> <p>There is no applicable rules in the subdivision chapter for the Tsunami Management Area.</p> <p>Rule 14.4.1 provides for up to four residential units to be constructed as a permitted activity. If this level of intensification is provided for, then having a non-complying</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				activity status and an avoid policy seems nonsensical.	
Chapter 6 – General Rules and Procedures					
6.10A – Tree Canopy Cover and Financial Contributions					
34.	6.10A	6.10A Rules 8.3, 8.5.1 and 8.7.12 - Subdivision; Rules 14.4.2 – 14.11.2 – Residential Built Form Standards. 14.6.1.3 RD13. 14.6.2.7 - Landscaping and tree cover.	Oppose	Kāinga Ora welcomes the Council's recognition of trees as a key element in successful urban environments. Kāinga Ora strongly support the Council increasing its prioritisation of the need to renew streetscapes, especially in areas where intensification has and will continue to occur. Such renewals should include kerb and channel replacement, undergrounding of overhead wires, and street tree planting. Kāinga Ora has substantial concerns with the 20% tree canopy cover target and considers it fundamentally	Delete Section 6.10A and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>unachievable in medium and high density environments on private land. Kāinga Ora consider the requirements to achieve 20% tree canopy cover is inconsistent with the spatial outcome requirements set out in the NPS-UD, and the Medium Density Residential Standard (MDRS) provisions of the Housing Supply Act.</p> <p>Kāinga Ora considers that the proposed financial contribution calculator is complicated and flawed, a simpler formula would be to require 1 tree to be planted per 100m² of site area, as an easier compliance threshold than a trigger of 10% of future canopy cover.</p> <p>It also has concerns with the reliance on Financial Contributions. Given that Council already own extensive areas of park and open space land (including several thousand hectares of land on</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>the Port Hills and Red Zone), in addition to extensive road reserve and local park areas, and given that Council takes Development Contributions for new parkland as part of any new development, the need for the land component to form part of the financial contributions appears to be particularly hard to justify.</p> <p>The need to provide rapid canopy cover potentially creates a perverse incentive to plant faster growing exotic species rather than natives. The proposed Financial Contribution could therefore result in a decline in biodiversity by driving developers to plant exotics over natives, with attendant adverse biodiversity outcomes, which is contrary of the desire in the Urban Forest Plan to seek diversity in tree species.</p>	
Chapter 8 – Subdivision, Development and Earthworks					

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
35.		Policy 8.2.2.1 – Recovery activities	Support in Part	<p>PC14 seeks to delete this policy which provides for a range of intensification opportunities in the RS and RSDT zones.</p> <p>Deletion of this policy may well be appropriate if MRZ is properly implemented across all relevant residential zones and the Kāinga Ora submission opposing the Public Transport and Airport Noise Influence Area QMs is confirmed i.e. the only areas which retain low density RS/ RSDT/ RHZ zoning are those subject to a high risk of natural hazards.</p>	Delete the policy as notified.
36.		Policy 8.2.3.2 – Connections to infrastructure	Support	<p>PC14 proposes an additional clause (g) relating to development in the vacuum sewer area. This policy provides for development in the area if connection is able to be made to a part of the waste water system that is not part of the vacuum sewer, or if sufficient capacity can be demonstrated (which could be for example through -on-site</p>	Retain Clause (g) as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				holding tanks and off-peak pumping into the network).	
37.		<p>Tree Canopy and Financial Contribution provisions:</p> <p>Objective 8.2.6 and associated policies;</p> <p>Clause 8.3.1(e)-(f) – how to apply to the rules</p> <p>Clause 8.3.3(b) – financial contributions</p> <p>Clause 8.3.7 – consent notices</p> <p>Clause 8.7.12 – Assessment matters</p>	Oppose	In line with our submission seeking the deletion of the tree canopy financial contribution rules, the related proposed references to tree canopy in the subdivision chapter policies and rules is also opposed.	Delete the provisions relating to the tree canopy financial contribution and associated tree canopy rules.
38.		8.4.1.1 - Notification	Support	Support clause (a)(i) that any controlled or restricted discretionary subdivision application shall not be publicly or limited notified.	Retain 8.4.1.1 as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
39.		8.5.1.2 – Controlled activities – C8 and C9	Support	Support controlled activity status for the creation of vacant allotments (C8) or allotments containing an existing or consented dwelling (C9), where these allotments comply with density standards.	Retain C8 and C9 as notified
40.		8.5.1.3 – Restricted discretionary activities – RD2(c) and RD2A	Support	Support restricted discretionary activity status where the proposed allotments do not comply with C8 or C9.	Retain RD2(c) and RD2A as notified.
41.		8.6.1 – minimum dimensions	Oppose	<p>Support the use of a minimum dimension for the creation of vacant sections. However, Kāinga Ora recommends an 8m x 15m minimum shape factor for MRZ and HRZ sites as this is demonstrated as practicable to construct a permitted medium density residential dwelling.</p> <p>The rule needs clarification that the minimum sizes apply to the creation of vacant lots, rather</p>	<p>Amend clause 8.63.1(c) as follows:</p> <p><u>The creation of vacant allotments that do not contain an existing or consented residential unit Allotments</u> in the Medium Density (including MRZ Hills), and High Density Residential Zones, shall have <u>accommodate</u> a <u>minimum dimension shape factor</u> of <u>10m 8m x 15m</u>. Within the Medium Density Residential (Residential Hills Precinct) Zone the allotment shall have a minimum dimension of 17m x 12m.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>than lots with an existing or consented dwelling.</p> <p>Similarly clarity needs to be retained that is explicit that the minimum net site provisions shall not apply to sites used exclusively for access, reserves, or infrastructure, or which are wholly subject to a designation.</p>	<p><u>This shape factor shall be located outside of:</u></p> <ol style="list-style-type: none"> <u>1. Land which may be subject to instability or is otherwise geotechnically unsuitable;</u> <u>2. Any existing or proposed easement areas required for access or services purposes;</u> <u>3. Network Utilities, including private and public lines.</u>
42.		<p>Table 1 – Minimum net site area</p> <p>Clause (a) and (c)</p> <p>Table 6 – Allotments with existing or proposed buildings</p>	Oppose	Kāinga Ora opposes both Table 1 and Table 6 and consider that the minimum shape factor provision proposed above is more appropriate	Delete Table 1 and Table 6.
44.		<p>8.9.2.1 – Earthworks</p> <p>Table 9</p>	Support in Part	<p>Earthworks are permitted through rule 8.9.2.31(P1), provided they comply with the volumes specified in Table 9.</p> <p>Table 9(d) in the Operative Plan limits earthworks to no more</p>	Amend Table 9(d) so the maximum volume is <u>50m³250m³/ site net fill above existing ground level</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>than 20m³ in all residential zones. Whilst these volumes do not include earthworks associated with a Building Consent i.e foundation construction, they are invariably triggered through the formation of driveways and landscaping. In practice, a 20m³ limit is frequently triggered for low density suburban development let alone medium density outcomes. As an example a standard driveway for a single dwelling is 4m wide by say 30m long = 120m². To build the driveway requires existing earth to be removed to a depth of 20cm, and then replaced with basecourse prior to being gravelled or asphalted. There is no change to existing ground levels. The cut is 24m³ (120m² x 0.2m depth), with fill being the same, resulting in 48m³.</p> <p>The rule threshold is considered to be unrealistically low, such that it generates numerous consents that are</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>invariably granted. The key effects that need to be controlled with earthworks are erosion and sediment control during construction (although the scale of such works means that they are generally completed within a couple of days and therefore do not generated significant risks of sediment discharge), and permanent changes to finished ground levels that would result in overlooking of neighbouring properties i.e. forming raised mounds or terraces.</p> <p>It is therefore sought that the rule be amended so the volume is net fill above existing ground levels. It is noted that filling within Flood Management Areas is separately controlled in Chapter 5.</p>	
Chapter 12 - Papakāinga/ Kāinga Nohoanga Zone and Chapter 8 subdivision					
45.	12.4.1 and 12.5.1	Activity status tables and built form rules	Support in Part	Kāinga Ora seek that the Papakāinga Zone be retained	Amend the Papakāinga/Kāinga Nohoanga Zone activity table and built

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				as a specific zone, given its unique policy outcomes and function. We seek that the MRZ built form rules however apply to the Papakāinga Zone. The activity status tables and built form standards are sought to therefore be amended to align with MRZ outcomes i.e. the Papakāinga Zone rules controlling matters such as height, boundary setbacks etc should simply align with those in the MRZ.	form standards to align with the built form rules in the MRZ.
46.	Chapter 8	Subdivision provisions relating to the Papakāinga/ Kāinga Nohoanga Zone	Oppose	The suite of subdivision provisions relating to minimum site sizes for the Papakāinga/ Kāinga Nohoanga Zone are sought to also be amended to align with MRZ outcomes.	Amend the subdivision standards for the Papakāinga/ Kāinga Nohoanga Zone to align with MRZ outcomes.
Residential Zone Introduction and Policy Framework – 14.1-14.2					
47.	Residential	14.1(e) Introduction to residential policies	Support in Part	Helpful statement for plan interpretation	<p>Retain statement.</p> <p>Amend reference at the end of the statement to "...subclause g f"</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
48.	Residential	14.2.1 – Objective - housing supply	Support	Support amendments given that Christchurch has moved beyond the immediate earthquake recovery period. Support recognition that the community's housing needs may change, and that provision needs to take into account future needs.	Retain the objective
49.	Residential	Policy 14.2.1.1 – Policy – Housing distribution and density	Support in Part	<p>Support the amendments to clause (a)(ii) and (iii) that clearly state the expectation that high density residential development will be established in both the Central City and in and near identified commercial centres.</p> <p>By amending clause (iii) to now reference high density, the policy is now silent on the locations and expectation of medium density development. Given that the introduction of MRZ across most of the City, there is a need for a clear statement in the policy regarding what is now the normative housing density.</p>	<p>Retain clauses (a)(ii) and (iii).</p> <p>Add a new clause (a)(iv) as follows (with consequential renumbering of subsequent clauses):</p> <p><u>(iv) medium density residential development is established across the majority of the City unless precluded by a qualifying matter.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
50.	Residential	Table 14.2.1.1a – Zone descriptions	Support	The proposed MRZ and HRZ descriptions align with the National Planning Standards descriptions.	Retain zone descriptions
51.	Residential	Policy 14.2.1.2 and 14.2.1.3	Support	Support deletion of these two policies as their original policy direction regarding the location of new medium density areas no longer aligns with the direction in the Enabling Act.	Support the deletion of these two policies.
52.	Residential	Objective 14.2.2 and associated policies 14.2.2.1-14.2.2.4 – short term recovery	Oppose	<p>Given that Christchurch is now some 12 years post-earthquake there may no longer be a need for these policies and associated mechanisms such as the 'Enhanced development mechanism' (EDM) and the 'Community Housing Redevelopment Mechanism'(CHRM).</p> <p>The housing opportunities and more enabling built form standards now provided through the MRZ and HRZ may make this suite of policies and short-term recovery tools unnecessary, however if the</p>	Delete Objective 14.2.2 and associated policies 14.2.2.1-14.2.2.4 and the associated EDM and CHRM in the event that the Public Transport accessibility QM is removed, and the Tsunami Hazard QM reduced to 1:100 year hazard.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				QM are retained and large parts of the city retain RS or RSDT then the EDM and CHRM are sought to remain as important tools.	
53.	Residential	Objective 14.2.3 and associated policies 14.2.3.1-14.2.3.5 - MDRS	Support	The objective and associated policies align with the policies mandated in the Enabling Act.	<p>Retain the objective and associated policies.</p> <p><i>Note that sequentially Policy 5 (14.2.3.3) should come at the end i.e. the policy 'batting order' should be 1 to 5 rather than the current arrangement of 1,2, 5, 3, 4.</i></p>
54.	Residential	Policy 14.2.2.2 b. iv. (Recovery housing higher density comprehensive redevelopment)	Oppose	Provided the Airport Noise Influence Area qualifying matter is deleted, the reference in Policy 14.2.2.2 b. iv. to Christchurch International Airport is unnecessary given the relevant land will be zoned for medium density residential development.	<p>14.2.2.2 Policy - Recovery housing higher density comprehensive redevelopment</p> <p>a. Enable and incentivise higher density comprehensive development of suitably sized and located sites within existing residential areas, through an Enhanced development mechanism which provides:...</p> <p>iv. Christchurch International Airport, arterial traffic routes, and railway lines.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
55.	Residential	Policy 14.2.3.6 – Framework for building heights	Oppose	<p>The policy does not provide a framework or rationale for the proposed heights and does not specify what the 'specific conditions' might be when taller buildings would be enabled.</p> <p>There is merit in having a policy that clearly articulates the building height hierarchy, with this hierarchy tied to proximity to commercial centres and the size / range of services provided in those centres.</p> <p>The requested amendments also reflect the Kāinga Ora position that Metropolitan Centres be employed within the centres hierarchy, as per the forward-looking aspects of the NPS-UD policies of 1, 3, and 6.</p> <p>These are sought to cover the existing key activity areas for Riccarton, Papanui, and Hornby. Furthermore, the higher density zoning around the city centre and metropolitan centres, are sought to extend</p>	<p>Delete policy and replace with the following:</p> <p><u>Enable building heights in accordance with the planned urban built character for medium and high density areas, whilst also enabling increased building heights under specific conditions.</u></p> <p><u>Encourage greater building height, bulk, form and appearance to achieve high density planned urban form when within the proximity of nearby commercial centres to deliver:</u></p> <p><u>a. At least 10 storey buildings within 1.2km of the Central City and the Metropolitan Centre zones in Hornby, Riccarton and Papanui;</u></p> <p><u>b. At least 6 storey buildings in proximity to town centres and medium and large local centres;</u></p> <p><u>c. At least 3-4 stories everywhere else in the MRZ.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				for 1.20 km, with a 400m Height Variation Overlay of 36m sought within 400m of the edge of these centres.	
56.	Residential	Policy 14.2.3.7 – management of increased building heights	Oppose	<p>The MDRS has the height rule as a restricted dictionary activity. MDRS Policy 5 explicitly seeks to ‘provide for developments not meeting permitted activity status, while encouraging high quality developments’.</p> <p>Taller buildings are therefore anticipated as being potentially appropriate subject to a site-specific assessment of effects. The policy needs to properly reflect that taller buildings are anticipated in appropriate locations and where the specific design properly manages the effects generated by the increase in height. As written this policy directly conflicts with Policy 5 of Sub clause 6 of Schedule 3A RMA.</p>	<p>Delete the policy and replace it with:</p> <p><u>Within medium and high density zoned areas, increased building heights are anticipated where:</u></p> <p>i. <u>The site has good accessibility to is public and active transport corridors, public open space, and a town or local commercial centre; and</u></p> <p>ii. <u>The design of the building appropriately manages potential shading, privacy, and visual dominance effects on the surrounding environment.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Taller residential buildings within 1.2km of the central city can only have a positive economic impact on the CBD by enabling more people to live within walking distance of the town centre. Given the large size of Christchurch, additional enablement of residential opportunities within 1.2km facilitates more people living near the centre i.e. it draws people in, rather than resulting in existing (or potential) CBD residents shifting out.	
57.	Residential	Policy 14.2.3.8 – fire fighting water capacity	Neutral		
58.	Residential	Objective 14.2.5 – high quality residential neighbourhoods	Support in Part	<p>Support the amendments to reference the planned urban character.</p> <p>References to ‘high’ quality in the title and the start of the objective will not always be appropriate or realistic. Use of language around ‘high standard’, ‘high level of amenity’, ‘spacious and</p>	<p>Amend the objective as follows:</p> <p>High Good quality, sustainable, residential neighbourhoods which are well designed, have a high level of amenity, enhance local character and reflect to reflect the planned urban character and the Ngāi Tahu heritage of Ōtautahi.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				attractive pedestrian circulation', 'high levels of glazing' can be used to set a bar that can be unrealistically high (or at least is very subjective). Kāinga Ora support high quality outcomes, however such language is subjective and is an easy stick that can be used by NIMBY opponents to higher density. Invariably multi-unit development involves the balancing of competing design outcomes (which are all perfectly valid), and it comes down to how these are balanced and prioritised – it often isn't possible to tick the optimal outcome across every matter.	
59.	Residential	Policy 14.2.5.1 – Neighbourhood character, amenity, and safety	Oppose	The matters subject to this policy are either captured in the MDRS policies which set the anticipated outcomes for MDRS, or are better articulated through proposed Policy 14.2.5.3 relating to	Delete policy.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>developments of 4 or more units.</p> <p>Policy direction for the remaining low density residential environments is provided through Policies 14.2.5.6-9.</p> <p>This policy therefore duplicates directions which are already better articulated elsewhere in the policy framework</p>	
60.	Residential	Policy 14.2.5.2 – high quality medium density residential developments	Support in Part	<p>Support the amendments to reference the planned urban character.</p> <p>References to ‘high’ quality in the title will not always be appropriate or realistic.</p>	<p>Amend policy as follows:</p> <p>14.2.5.2 Policy – High Good quality, medium density residential development</p> <p>Encourage innovative approaches to comprehensively designed, high good quality, medium density residential development, which is attractive to residents, responsive to housing demands, and provides a positive contribution to its environment (while acknowledging the need for increased densities and changes in residential</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>character) reflects the planned urban built character of an area, through:</p> <ul style="list-style-type: none"> i. consultative planning approaches to identifying particular areas for residential intensification and to defining high good quality, built and urban design outcomes for those areas; ii. encouraging and incentivising amalgamation and redevelopment across large-scale residential intensification areas; iii. providing design guidelines to assist developers to achieve high good quality, medium density development; iv. considering input from urban design experts into resource consent applications; v. promoting incorporation of low impact urban design elements, energy and water efficiency, and life-stage inclusive and adaptive design; and vi. recognising that built form standards may not always support the best design and efficient use of a site for medium density development, particularly for larger sites.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
61.	Residential	Policy 14.2.5.3 – quality large scale developments	Support in Part	<p>The policy is generally appropriate and captures the key design elements necessary to support the good design of more intensive residential complexes.</p> <p>As above, ‘good quality’ is considered to be a more appropriate term than ‘high quality’.</p>	<p>Amend the policy as follows:</p> <p>14.2.5.3 Policy – Good gQ quality large scale developments</p> <p>a. Residential developments of four or more residential units contribute to a high good quality residential environment through site layout, building and landscape design to achieve:</p> <ul style="list-style-type: none"> i. engagement with the street and other spaces; ii. minimisation of the visual bulk of buildings and provision of visual interest; iii. a high good level of internal and external residential amenity; iv. high good quality shared spaces, including communal living spaces and accessways that provide safe, direct access for pedestrians; v. a safe and secure environment; and

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					vi. public through connections for large sites with multiple public frontages.
62.	Residential	Policy 14.2.5.4 – On-site waste storage	Oppose	A policy is not necessary for this level of detail. The matters addressed by the policy are covered at an appropriate level in Policy 14.2.5.3 above.	Delete policy
63.	Residential	Policy 14.2.5.5 – Wind effects	Support in Part	While Kāinga Ora does not oppose the potential need for wind effects to be considered, the concern lays around appropriateness of Matters of Discretion, the proposed height limits triggering an assessment and technical expertise available to carry out these assessments or determine if assessments (or anticipated effects) are appropriate.	<ol style="list-style-type: none"> 1. Retain Policy 14.2.5.5, noting that Kāinga Ora has submitted on provisions relating to wind effects. 2. Move all provisions relating to wind to sit under the General Rules.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
64.	Residential	Objective 14.2.6 – Medium density residential zone	Oppose	The MDRS objective 2 and Policies 1-5 discussed above (objective 14.2.3 and associated policies 14.2.3.1-14.2.3.5) provide the policy framework for MDRS and as such this objective and associated policy are unnecessary	Delete the objective
65.	Residential	Policy 14.2.6.1 - MDRS	Oppose	As per comments on Objective 14.2.6	Delete the policy
66.	Residential	Policy 14.2.6.2 – local centre intensification precincts	Oppose	As discussed in the section on HRZ height limits, the proposed approach to heights and precincts is unnecessarily complicated. Local Centre Intensification Precincts are well-located for enabling more people to live in close proximity to a range of services. The area covered by this precinct is sought to be simply rezoned to HRZ, and as such this policy is no longer necessary and can be deleted.	<ol style="list-style-type: none"> 1. Delete the policy and associated Local Centre Intensification Precinct from the planning maps. 2. As sought elsewhere in this submission, rezone the land within the Local Centre intensification Precinct to HRZ.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
67.	Residential	Objective 14.2.7 and associated policies - HDRS	Neutral	It would thematically make more sense for these provisions to be located after the policies on MRZ, which would then lead into the policies on heights and design outcomes	Relocate the HRZ provisions so they are located after the suite of MRZ policies i.e. after Policy 14.2.3.5.
68.	Residential	Objective 14.2.7 and policies 14.2.7.1-14.2.7.3	Support	The objective and policies provide for higher density development in appropriate locations.	Retain the objective and policies.
69.	Residential	Policy 14.2.7.4 and Policy 14.2.7.5	Oppose	As set out elsewhere in this submission, the precinct approach is unnecessarily complicated. A simplified approach is sought through amendments to the HRZ height rules, with this rationalised approach to heights provided with appropriate policy support through Objective 14.2.7 and policies 14.2.7.1-14.2.7.3 (along with Policy 14.2.3.7 as sought to be amended above)	Delete the policies and the associated Large Local Centre Intensification Precincts and the High Density Residential Precincts.
70.	Residential	Policy 14.2.7.6 – High density development	Oppose	The requirement that sites be at least two stories in height may not be appropriate in a range of circumstances and is	Delete the policy.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>unnecessarily complex – there is significant theoretical capacity in these areas so maintaining design flexibility is more important than maintaining capacity.</p> <p>Whilst sites can be amalgamated, there is no requirement for amalgamation.</p> <p>It can be quite appropriate to locate building height and mass away from the road edge in high density environments, depending on site shape, size, orientation, and building design</p>	
71.	Residential	Objective 14.2.8 and policies 14.2.8.1 and 14.2.8.2 – Central City	Support	This Operative Plan objective and associated policies are proposed to be deleted in PC14. This deletion is supported as the policy direction is no longer appropriate, with the purpose of the HRZ near the central city better articulated through the proposed new replacement provisions in 14.2.8 and policies 14.2.8.1 and 14.2.8.2	Support the deletion of these provisions as shown in PC14 as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
72.	Residential	Objective 14.2.8 – Future urban zone Associated policies 14.2.8.1 to 14.2.8.7	Support in Part	<p>See comments elsewhere regarding zone labelling. The FUZ label has not been appropriately applied to existing greenfield urban zoned locations – existing urban zoned but unbuilt residential land are sought to be MRZ (unless appropriately justified QM apply). An example of just such an approach is the correct application of a HRZ around the emerging Halswell commercial centre where already zoned RNN land is yet to be built, but has a proposed HRZ applied. In the same way the balance of this RNN area is to have a MRZ applied rather than FUZ.</p> <p>Taking a consistent national view in the application of National Planning Standards, the FUZ zone label is only used in other District Plans for areas that are yet to have an operative urban zone. A FUZ is a 'holding zone' that identifies where medium to long term urban growth is anticipated.</p>	<ol style="list-style-type: none"> 1. Delete references to FUZ and relabel existing urban zoned but undeveloped residential land as MRZ (or HRZ if appropriately located proximate to a large commercial centre). 2. Retain the 14.2.8 section as it provides useful direction on how the build-out of greenfield residentially zoned areas is to occur. 3. Amend the objective as follows: 14.2.8 Objective – <u>Development of greenfield areas</u> Future Urban Zone Co-ordinated, sustainable and efficient use and development is enabled in the Future Urban Zone <u>greenfield growth areas</u>.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>The FUZ zone provisions are focussed on preventing rural activities from occurring that could prejudice future urbanisation e.g. quarries or intensive farming or lifestyle block subdivision. Invariably the plan frameworks require a further plan change process to be undertaken to activate or 'live zone' a residential zone that can then be developed.</p> <p>The associated policies that guide the build-out of greenfield areas remain appropriate.</p>	
73.	Residential	Policy 14.2.9.4 – Existing non-residential activities	Support in Part	<p>This existing Operative Plan policy has in practice created ambiguity when non-residential sites are proposed to be redeveloped for a different non-residential activity i.e. the reference to 'redevelopment' can be interpreted as only applying to the existing activity having new facilities, rather than enabling the site to be efficiently repurposed for a</p>	<p>Amend the policy as follows:</p> <p>Enable existing non-residential sites activities to continue to be used for a range of non-residential activities and support their redevelopment and expansion provided they do not:</p> <ul style="list-style-type: none"> i. have a significant adverse effect on the anticipated character and amenity of residential zones; or ii. are of a scale or activity that would undermine the role or

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>different type of non-residential activity.</p> <p>With neighbourhoods transitioning to medium density outcomes, it is important that residents have easy access to convenience retail and a range of community facilities. The adaption and repurposing of existing non-residential sites is a useful tool for enabling such provision as part of delivering good quality neighbourhoods.</p> <p>It is accepted that such changes need to be assessed on a case-by-case basis to ensure compatibility with a residential context, with the MRZ and HRZ description both anticipating that such zones will include compatible non-residential activities.</p>	<p><u>function of any nearby commercial centres. undermine the potential for residential development consistent with the zone descriptions in Table 14.2.1.1a.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
74.	Residential	Objective 14.2.12 and Policy 14.2.12.1 – compatibility with industrial activities	Oppose	<p>Kāinga Ora considers that at the interface of industrial and residential zones the onus for managing effects rest primarily with the industrial activity. The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p> <p>Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be appropriate with the benefits of the QM not outweighing the costs.</p>	Delete Objective 14.2.12 and Policy 14.2.12.1 and the Industrial Interface Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
75.	Residential	14.3 – how to apply the rules		Kāinga Ora notes that the relevant objectives and policies are still provided for within the Plan and therefore questions the relevance of these if the Community Housing redevelopment mechanism has been deleted.	<p>Consistent with this submission, Kāinga Ora supports the deletion of the Community Housing Redevelopment Mechanism, provided Plan Change 14 is amended consistent with the relief sought in this submission.</p> <p>Kāinga Ora notes that the relevant objectives and policies are still provided for within the Plan and therefore questions the relevance of these if the Community Housing redevelopment mechanism has been deleted.</p>
14.3 How to interpret and apply the rules					
76.	Residential	14.3 How to interpret and apply the rules – Clause f. xvi.	Oppose	The proposed deletion is consequential to the deletion of the Airport Noise Influence Area qualifying matter, amongst others deleted here and throughout the body of this submission.	<p>f. There are parts of residential zones where the permitted development, height and/or density directed by the MDRS or Policy 3 of the NPS-UD may be modified by qualifying matters. These are identified in detail in Chapter 6.1A and the Planning Maps, and include the following:</p> <p>i. Historic Heritage including heritage items, heritage settings, Residential</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>Heritage Area, Residential Heritage Area Interface</p> <p>ii. Riccarton Bush Interface Area</p> <p>iii. Heritage, Significant and other Trees</p> <p>iv. Sites of Ecological Significance</p> <p>v. Outstanding Natural Features and Landscapes</p> <p>vi. Sites of Cultural Significance</p> <p>vii. Residential Character Areas</p> <p>viii. High Flood Hazard Management Area</p> <p>ix. Flood Ponding Management Area</p> <p>x. Coastal Hazard High Risk Management Area and Coastal Hazard Medium Risk Management Area</p> <p>xi. Tsunami Management Area</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					xii. Slope Hazard xiii. Waterbody Setback xiv. Railway Building Setback xv. Electricity Transmission Corridor and Infrastructure xvi. Airport Noise Influence Area xvii. Waste Water Constraint Area xviii. Lyttelton Port Influence Area xix. Low Public Transport Accessibility Area xx. City Spine Transport Corridor xxi. Industrial Interface
14.4 Residential Suburban and RSDT Zone rules					
77.	Residential	14.4.2.2 – Tree and garden planting	Oppose	The proposed amendments to this rule duplicate and confuse the regulatory framework with	Delete the proposed amendments and retain the Operative Plan rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>the tree FC rule – essentially it introduces two rules to control the same matter.</p> <p>Kāinga Ora oppose the tree FC rule and this rule amendment for the reasons given in the submission on the tree FC rule.</p> <p>In the event that the tree FC rule is retained, this rule is sought to simply have an advice note directing Plan users to the FC rule and the additional tree canopy outcomes sought in that separate rule.</p>	
78.	Residential	14.4.2.3 - height	Oppose	<p>This rule introduces an 8m height limit if you're in the Riccarton Bush QM and under the Airport Noise Influence Area (which is why it has a RS zoning rather than MRZ).</p> <p>Kāinga Ora have opposed before the extent of the Airport Noise Influence Area and the Riccarton Bush QM and have sought the area around</p>	<ol style="list-style-type: none"> 1. Delete 8m Riccarton Bush height limit. 2. Delete 7m height rule in the Industrial Interface Qualifying matter area and apply relevant MRZ or HRZ heights.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Riccarton Bush is MRZ to the north and HRZ to the south, as such there is no need for an 8m height limit in the RS zone.</p> <p>Separately the height rule also introduces a 7m height limit in the industrial interface QM – which given that this is a rule being applied to the RS and RSDT zones this duplicates an existing situation. Kāinga Ora supports the deletion of this rule and application of relevant MRZ or HRZ zones and heights.</p>	
14.5 Medium Density Zone Rules					
79.	Residential	All controlled and RD rules re notification statements		<p>Consistent logic needs to be applied to the notification statements as follows:</p> <p>If the rule controls an internal occupant amenity matter or general street-scape outcomes then rule breaches should be non-notified as it is only the</p>	<p>1. Amend notification statements in both activity and built form rules to align with this logic.</p> <p>Non-notified:</p> <p>14.5.1.3 (RD1) – four or more units</p> <p>14.5.2.2 – landscaping</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>occupant who is affected or passers-by;</p> <p>If the rule it controls a neighbouring site interface matter then it should be open to an assessment re limited notification but should not be publicly notified. Ltd but not full;</p> <p>If it rule controls a matter that could impact on urban form at a neighbourhood scale e.g. height, then it should be open to a full s95 assessment.</p>	<p>14.5.2.5 – Outdoor Living Space</p> <p>14.5.2.8 – Outlook space</p> <p>14.5.2.9 – Fencing</p> <p>14.5.2.10 – Windows to street</p> <p>14.5.2.11 – Minimum unit size</p> <p>14.5.2.12 – Ground floor habitable space</p> <p>14.5.2.13 – Service and storage space</p> <p>14.5.2.15 – Garage and carports</p> <p>14.5.2.16 – Building reflectivity</p> <p>14.5.2.16 – mechanical ventilation</p> <p>14.5.2.18 – Spine road setbacks</p> <p>Open to limited but not public notification:</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
80.	Residential	Assessment matters	Oppose	The proposed assessment matters for both the '4 or more units' urban design rule and the built form rules are excessive and overlapping. Kāinga Ora seek that they are simplified and consolidated.	<ol style="list-style-type: none"> 1. For the 'non-notified' rules set out above, the matters for assessment are to be limited to the adequate provision of amenity for occupants and the delivery of a functional and attractive streetscape. 2. For the rules that potentially affect neighbouring sites set out above, additional matters relating to consideration of the amenity of neighbouring sites are appropriate. 3. For height, additional matters relating to urban form and proximity to services and public and active transport modes are appropriate, along with consideration of wind effects for buildings over 22m in height. 4. For the 4+ unit urban design rule, matters of discretion are sought to be as follows: <ol style="list-style-type: none"> a) <u>Whether the design of the development is in keeping with, or complements, the scale and character of development anticipated for the surrounding area and relevant significant natural, heritage and cultural features.</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>b) <u>The relationship of the development with adjoining streets or public open spaces including the provision of landscaping, and the orientation of glazing and pedestrian entrances;</u></p> <p>c) <u>Privacy and overlooking within the development and on adjoining sites, including the orientation of habitable room windows and balconies;</u></p> <p>d) <u>The provision of adequate outdoor living spaces, outdoor service spaces, waste and recycling bin storage including the management of amenity effects of these on occupants and adjacent streets or public open spaces;</u></p> <p><u>Where on-site car parking is provided, the design and location of car parking (including garaging) as viewed from streets or public open spaces</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
81.	Residential	14.5.1(P1) – Residential activity	support	<p>The proposed amendment to P1 to delete the limit on units with more than 6 bedrooms is supported. The definition of 'residential activity' includes emergency and refuge housing, and sheltered housing and so the amendment better enables such facilities to be established in the MRZ as a permitted activity where they provide accommodation for more than 6 residents.</p> <p>It is noted that boarding houses, student hostels, and retirement villages are separately defined and managed through separate rules.</p>	Retain rule as proposed.
82.	Residential	14.5.1(P3) – Elderly Persons Housing	Support in Part	Need to clarify – the Operative Plan P3 provides a permitted pathway for the conversion of Elderly Persons Housing to general tenure as a permitted activity. The provision of such a pathway is supported. PC14	<p>Either:</p> <ol style="list-style-type: none"> 1. Reinstate P3 so there is a clear permitted pathway; or 2. Include an advice note under P1 as follows:

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>proposes to delete this pathway.</p> <p>The PC14 amendment is ambiguous as to whether the deletion of P3 means that conversion of EPH is no longer permitted, OR is it proposed to be deleted because there is now no such thing as an EPH because MDRS now enables multi-units so it is now implicit that you can convert existing EPH as such conversion would simply fall within the ambit of P1?</p> <p>Given the number of EPH in the City it is important that there is an unambiguous position on how their conversion is to be treated.</p>	<p><u>Conversion of existing Elderly Persons Housing is permitted under P1.</u></p>
83.	Residential	Controlled		<p>PC14 deletes existing rules controlling non-compliance with tree and garden planting, ground floor habitable space, and service spaces. These are all existing Operative Plan rules rather than MDRS rules. Given</p>	<p>Retain controlled activity status Rule 14.5.1.2.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				that they are being retained as built form standards (apart from the overhang rule), the existing controlled activity status are sought to also be retained.	
84.		RD1 – urban design assessment	Support	Support retention of non-notified clause	Retain as notified
85.		RD27 – wind assessment	Oppose	<p>While Kāinga Ora does not oppose the potential need for wind assessments on tall buildings (above 6 storey), the concern lays around appropriateness of Matters of Discretion, the proposed height limits triggering an assessment and technical expertise available to carry out these assessments or determine if assessments (or anticipated effects) are appropriate.</p> <p>Kāinga Ora seeks that the rule provide a permitted pathway. Buildings may separately breach height rules but that is a separate matter (just as they will also invariably require</p>	<ol style="list-style-type: none"> 1. Delete the rule. 2. As an alternative relief in the event that a regulatory approach to wind modelling is retained, redraft the rule to provide for a permitted pathway (for wind effects) where compliance with the specified performance standards is met. 3. Kāinga Ora seeks that the provisions relating to wind effects are moved to sit under the General Rules.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				consent under RD2 for more than 3 units).	
86.		D11 – industrial interface QM	Oppose	<p>Kāinga Ora considers that at the interface of industrial and residential zones the onus for managing effects rest primarily with the industrial activity. The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p> <p>Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be appropriate with the benefits of</p>	Delete the Industrial Interface Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				the QM not outweighing the costs.	
87.		14.5.2.1 – servicing advice note	Support in Part	<p>Servicing constraints mean that whilst resource consent could be granted, Building Consent could be declined if services are not available. Infrastructure constraints need to be readily searchable via on-line tool that can be readily updated, given that CCC presumably know where capacity limits are.</p> <p>The general onus is on Council to address constraints within Council-controlled networks via LTP and DC processes to enable MDRS.</p>	<ol style="list-style-type: none"> 1. Retain the advice note. 2. Kāinga Ora seek that Council investigate the provision of an on-line publicly searchable tool to enable timely identification of site constraints.
88.		14.5.2.2 – Landscaping and tree canopy	Oppose	In accordance with our submission seeking deletion of the tree canopy financial contribution rule, the landscaping and tree canopy rule is sought to be deleted and	<p>Delete rule and replace with the following:</p> <p><u>14.5.2.2 landscaped area.</u></p> <p><u>(1) A residential unit at ground floor level must have a landscaped area of a minimum of 20% of a developed site</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>replaced with the MDRS standard.</p> <p>An additional clause is proposed for non-residential activities that aligns with the MDRS outcomes.</p>	<p><u>with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p> <p><u>2. The landscaped area may be located on any part of the development site, and does not need to be associated with each residential unit.</u></p> <p><u>3. Non-residential activities must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p>
89.		14.5.2.3(i)a - Height	Support	Rule implements MDRS as per Schedule 3A	Retain rule as notified
90.		14.5.2.3(i)b – Height in local centre intensification precincts	Oppose	<p>The Local Centre Intensification Precincts are all located in close proximity to large suburban commercial centres such as Barrington and Bishopdale Malls. These areas are well placed to be HRZ.</p> <p>The areas within this precinct are sought to be rezoned to</p>	Delete clause.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				HRZ and therefore this clause can be deleted.	
91.		14.5.2.3(iv) Industrial interface and (v) Riccarton Bush	Oppose	<p>Kāinga Ora considers that at the interface of industrial and residential zones the onus for managing effects rest primarily with the industrial activity. The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p> <p>Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be</p>	Delete 14.5.2.3(iv) and 14.5.2.3(v).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>appropriate with the benefits of the QM not outweighing the costs.</p> <p>The area around Riccarton Bush is ideally located for supporting a High Density Residential Zone given its close proximity to a large town centre, cycleways, high frequency bus routes, and the large university activity hub</p>	
92.		14.5.2.4 – Building Coverage	Support in Part	<p>The rule implements MDRS as per Schedule 3A.</p> <p>Kāinga Ora support additional exemptions for eaves and guttering, although it is sought that this be extended to 600mm which is a standard eave depth and better provides for weather tightness design solutions. Eaves do not have a significant impact on visual dominance, and setbacks from neighbours are controlled through separate</p>	<p>Amend rule as follows:</p> <ul style="list-style-type: none"> a. The maximum building coverage must not exceed 50% of the net site area. b. ... c. <u>Eaves and roof overhangs up to 300mm 600mm in width and guttering up to 200mm in width form the wall of a building shall not be included in the building coverage calculation.</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				rules on internal setbacks and height-to-boundary.	
93.		14.5.2.5 – Outdoor living space	Support	The rule implements MDRS as per Schedule 3A	Retain rule as notified.
94.		14.5.2.6 – Height to boundary	Oppose	The provision as proposed is inconsistent with the MDRS.	Delete and replace with MDRS provision.
95.		14.5.2.7 – Building setbacks	Support in Part	<p>Support clauses (a)(i) and (ii) as implements MDRS as per Schedule 3A.</p> <p>Support clause (iii) enabling eaves and gutters to project into the road boundary setback. Extend the eave exemption to 600mm to align with standard building practice, along with enabling deeper porches which have a strong functional benefit. Such projections have a minimal impact on streetscape amenity and can have benefits through providing greater</p>	<p>1. Retain clause (a)(i) and (ii) as notified.</p> <p>2. Amend clause(a)(iii) as follows:</p> <p>Only road boundary: Eaves, and roof overhangs, and porches to a maximum of 300mm 600mm in width measured from the wall of a building and guttering up to 200mm in width.</p> <p>3. Amend clause (a)(iv) as follows:</p> <p>All other accessory buildings or garages, including garages that internally access a residential unit.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
				<p>articulation in the street-facing facade.</p> <p>Clause (iv) – support reduction in setbacks for accessory buildings, subject to the limitations to height and length in the rule. A grammatical amendment would be helpful to clarify that accessory buildings do not need to have internal access to the dwelling</p>							
96.		14.5.2.8 – Outlook space	Support	The rule implements MDRS as per Schedule 3A. The minor amendment to clause (i)(i) is supported.	Retain the rule as notified.						
97.		14.5.2.9 - Fencing	Support in Part	<p>Support 2m height limit on internal boundary fencing.</p> <p>The proposed rules will result in a significant loss of occupant amenity where outdoor living is located between the unit and the street. Whilst such a layout is not generally preferred, for east-west streets, the units on the southern side of the street</p>	<p>Retain clause (iii) as notified.</p> <p>Delete clauses (i) and (ii) and replace with the following (Operative Plan rule and associated diagrams reinstated):</p> <table><tr><td></td><td>Fence type</td><td>standard</td></tr><tr><td>i</td><td>Where at least 50% of the fence structure is</td><td>1.8m</td></tr></table>		Fence type	standard	i	Where at least 50% of the fence structure is	1.8m
	Fence type	standard									
i	Where at least 50% of the fence structure is	1.8m									

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
				<p>will face north where it can often result in good design outcomes for the outdoor living to be located between the unit and the street to take advantage of the northern orientation.</p> <p>Retain the Operative Plan rules on road frontage fencing which are well understood by the design community and achieve an appropriate balance in occupant amenity and streetscape outcomes.</p>	<table><tr><td></td><td><u>visually transparent</u></td><td></td></tr><tr><td><u>ii</u></td><td><u>Where less than 50% of the fence structure is visually transparent</u></td><td><u>1.2m</u></td></tr></table>		<u>visually transparent</u>		<u>ii</u>	<u>Where less than 50% of the fence structure is visually transparent</u>	<u>1.2m</u>
	<u>visually transparent</u>										
<u>ii</u>	<u>Where less than 50% of the fence structure is visually transparent</u>	<u>1.2m</u>									
98.		14.5.2.10 – Windows to the street	Support in Part	<p>Clause (a) of the rule implements MDRS as per Schedule 3A.</p> <p>Clause (b) re excluding gables is supported.</p> <p>Clause (c) relating to units with large streetscene setbacks is also supported as the large setbacks mean that the streetscene outcomes sought by the rule are less relevant.</p>	<p>1. Retain clauses (a)-(d) as notified.</p> <p>2. Delete clause (e).</p>						

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Clause (d) to incentivise front doors and their contribution towards an attractive street façade is supported.</p> <p>Clause (e), whilst trying to be enabling, adds considerable (and unnecessary) complexity to the rule for little gain.</p>	
99.		14.5.2.11 – Minimum unit size	Support	No amendments are proposed to the Operative Plan rule on minimum unit sizes. This rule is well-established and appears to be working well.	Retain rule as notified.
100.		14.5.2.12 – Ground floor habitable room	Support in Part	<p>The Operative Plan includes a rule controlling ground floor habitable rooms which is well-established and appears to be working well.</p> <p>There are two key design outcomes sought, namely 1) the ground floor on the road frontage is habitable space rather than garaging in order to deliver positive streetscape outcomes; and 2) that at least 50% of the ground floor across</p>	<p>Amend the rule as follows:</p> <p>a. Any building that includes a residential unit shall:</p> <p>i. Where the residential unit fronts a road or public open space, unless built over a separate ground floor residential unit, have a habitable room located at ground floor level with a minimum internal dimension of 3 metres; and</p> <p>ii. Any residential unit shall have at least 50% of any ground floor area as habitable rooms.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>the site is habitable space, to avoid the ground floor of complexes being overly dominated by garaging and undercroft parking areas.</p> <p>The proposed rule is sought to be amended to better articulate these two outcomes and to avoid developments arranged as horizontally stacked low-rise apartments being unnecessarily penalised through a requirement for every unit to individually have ground floor space.</p> <p>As all MRZ now has a height limit of 11m or more, clause (b) requires amendment, noting that the outcomes of 50% habitable remains as a valid outcome for the small areas of MRZ that have a height of less than 11m through QMs.</p>	<p>a. <u>Where a residential unit fronts a road or public open space, it shall have a habitable room with a minimum internal dimension of 3 metres located at the ground floor level facing the frontage. This rule does not apply to upper-level units that are built over a separate ground floor residential unit; and</u></p> <p>b. <u>Where the permitted height limit is over 11m (refer to Rule 14.5.2.3),</u> a minimum of 50% of the ground floor area <u>across the site</u> shall be occupied by habitable spaces and/or indoor communal living space. This area may include pedestrian access to lifts, stairs, and foyers.</p> <p>c. This rule does not apply to residential units in a retirement village.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
101.		14.5.2.13 - storage	Support in Part	<p>The requirement for outdoor storage for bins and washing lines is an Operative Plan rule that appears to be working well.</p> <p>Clause (a) relating to outdoor storage is supported, although may be an unnecessary level of regulation if this matter is adequately covered by urban design assessment matters.</p> <p>Clause (b) is a new rule in PC14. It requires a minimum amount of internal storage to be provided. Whilst internal storage spaces are useful, this rule is considered to be an unnecessary level of regulation.</p> <p>It is noted that clause (a) only applies to 4 or more units, while clause (b) applies to all units i.e. it is unclear what the rationale is behind the different number of units that trigger the clauses.</p>	<ol style="list-style-type: none"> 1. Retain clause (a). 2. Delete clause (b). 3. Alternatively storage could be addressed as an assessment matter for developments of 4 or more units.
102.		14.5.2.14 – Water supply for fire fighting	Neutral		

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
103.		14.5.2.15 – Garage location	Support in Part	<p>The location of car parking can have a significant impact on streetscape quality. A requirement to recess garaging or carports behind the front building line is supported.</p> <p>It is noted that this rule is only triggered where there are 4 or more units. It also does not apply to surface car parking areas which can also have a significant adverse effect on streetscape. Recessing is only required along the street frontage i.e. the rule must not apply to the front face of units located internally within a site.</p>	<p>Amend the rule as follows:</p> <p>14.5.2.15 garaging and carport building and parking area location</p> <p><u>When developing four or more residential units on a single site, where a residential unit fronts towards a road, any garage, or carport shall be located at least 1.2 metres behind the front façade of a residential unit.</u></p>
104.		14.5.2.16 – Building reflectivity; and RD29	Oppose	<p>New rule that applies to the Residential Hills Precinct – Christchurch as had residential hill suburbs for over 100 years and these areas have not given rise to excessive glare issues from dwellings. Whilst rules controlling reflectivity can be appropriate in rural ONLs where the key outcome is to minimise the visibility of</p>	Delete rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>structures, such an outcome is not appropriate in residential suburbs where housing is an inherent part of the landscape.</p> <p>Requiring low light reflectance values means that buildings have to be finished in dark colours which can exacerbate urban heat island effects and require increased use of air conditioning to reduce unit heating in summer.</p>	
105.		<p>14.5.2.17 – Location of outdoor mechanical ventilation;</p> <p>And RD30</p>	Oppose	<p>New rule that requires a 3m setback if at ground level between a residential unit and the road or a shared accessway. Presumably it is visual effects that are the concern.</p> <p>The rule constitutes a level of design detail that is unnecessary to regulate. If mounted at ground level then even a short 1.2m high fence is sufficient to visually screen in a</p>	Delete the rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>similar manner to the proposed rule on bin storage.</p> <p>As drafted the rule applies to mechanical units on the ground, whereas they would be permitted if wall-mounted despite having a worse visual outcome. It also applies to mechanical units located adjacent to internal boundaries where the property next door (over the fence) has an accessway.</p>	
106.		14.5.2.18 – Spine Road setbacks	Oppose	<p>The new rule requires buildings and outdoor living spaces to be set back 4m from spine road corridors (where the corridor is less than 24m in width, which is the majority of the corridor given 20m road reserves are typical).</p> <p>It is understood that the intention of the rule is to enable road widening in the future to accommodate public rapid transit. If Council's intention is to acquire land in the future to</p>	<ol style="list-style-type: none"> 1. Delete the rule. 2. If land acquisition for public works is the intent, then Council should initiate a Notice of Requirement to designate the corridor.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>facilitate public works then it should use the designation powers available to it.</p> <p>Given the highly developed nature of these existing corridors with lengthy sections of commercial property built to the road boundary, it is unclear how any corridor-long road widening will occur without major land acquisition and demolition.</p>	
High Density Residential Zone					
107.		Controlled and Restricted Discretionary notification statements	Support in Part	<p>Consistent logic needs to be applied to the notification statements as follows:</p> <p>If the rule controls an internal occupant amenity matter or general street-scape outcomes then rule breaches are sought to be non-notified as it is only the occupant who is affected or passers-by;</p>	<p>Amend notification statements in both activity and built form rules to align with this logic.</p> <p>Non-notified:</p> <p>14.6.1.3 (RD2) – four or more units</p> <p>14.6.2.7 – landscaping</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>If the rule it controls a neighbouring site interface matter then it should be open to an assessment re limited notification but should not be publicly notified. Ltd but not full;</p> <p>If it rule controls a matter that could impact on urban form at a neighbourhood scale e.g. height, then it should be open to a full s95 assessment.</p>	<p>14.6.2.10 – Outdoor Living Space</p> <p>14.6.2.4 – Outlook space</p> <p>14.6.2.5 – Building separation</p> <p>14.6.2.6 – Fencing</p> <p>14.6.2.8 – Windows to street</p> <p>14.6.2.16 – Minimum unit size</p> <p>14.6.2.9 – Ground floor habitable space</p> <p>14.6.2.11 – Service and storage space</p> <p>14.6.2.14 – Garage and carports</p> <p>14.6.2.15 – mechanical ventilation</p> <p>14.6.2.17 – Spine road setbacks</p> <p>Open to limited but not public notification:</p> <p>14.6.2.12 – Building coverage</p> <p>14.6.2.2 – height to boundary</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					14.6.2.3 – internal boundary setbacks 14.6.2.13 – Water for Firefighting (FENZ only) Open to full s95 assessment: 14.6.2.1 – height
108.		Assessment matters	Oppose	The proposed assessment matters for both the '4 or more units' urban design rule and the built form rules are excessive and overlapping. Kāinga Ora seeks that they be simplified and consolidated.	<ol style="list-style-type: none"> 1. For the 'non-notified' rules set out above, the matters for assessment are sought to be limited to the adequate provision of amenity for occupants and the delivery of a functional and attractive streetscape. 2. For the rules that potentially affect neighbouring sites set out above, additional matters relating to consideration of the amenity of neighbouring sites are appropriate. 3. For height, additional matters relating to urban form and proximity to services and public and active transport modes are appropriate, along with consideration of wind effects for buildings over 22m in height.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>4. For the 4+ unit urban design rule, matters of discretion are sought to be as follows:</p> <p>e) <u>Whether the design of the development is in keeping with, or complements, the scale and character of development anticipated for the surrounding area and relevant significant natural, heritage and cultural features.</u></p> <p>f) <u>The relationship of the development with adjoining streets or public open spaces including the provision of landscaping, and the orientation of glazing and pedestrian entrances;</u></p> <p>g) <u>Privacy and overlooking within the development and on adjoining sites, including the orientation of habitable room windows and balconies;</u></p> <p>h) <u>The provision of adequate outdoor living spaces, outdoor</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p><u>service spaces, waste and recycling bin storage including the management of amenity effects of these on occupants and adjacent streets or public open spaces;</u></p> <p>i) <u>Where on-site car parking is provided, the design and location of car parking (including garaging) as viewed from streets or public open spaces.</u></p>
109.		RD2 and RD6 – urban design	Support in Part	<p>RD2 is the Operative Plan rule that requires an urban design assessment for more than 3 units. Clause (a)(i) of the rule implements MDRS as per Schedule 3A.</p> <p>Clause (a)(ii) and (iii) are unnecessary as the assessment of projects that do not comply with garage location and ground floor habitable space are addressed through proposed rule RD20.</p>	<p>Retain clauses (a)(i) and (b)</p> <p>Delete clauses (a)(ii) and (iii).</p> <p>Delete rule RD6</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Given that the purpose of this rule is to enable an urban design assessment, rather than consideration of any built form rule breaches, the retention of the clause (b) 'not limited or publicly notified' clause is supported.</p> <p>Proposed RD6 simply duplicates the assessment required under RD2(a)(i) and therefore is unnecessary and is sought to be deleted.</p>	
110.		RD7 and RD 8 – building heights 14.6.2.1 - Height	Oppose	<p>The approach to managing height is unnecessarily over-complicated and seeks to introduce additional built form rules relating to outdoor living space and internal boundary setbacks as an activity standard.</p> <p>Kāinga Ora seek that the Plan be simplified so that the MRZ has a single height limit rule as per the MDRS (subject to QMs). What is currently the MDRS Local Centre</p>	<ol style="list-style-type: none"> 1. Delete these two activity rules. Replace with: <u>Buildings that do not meet Rule 14.6.2.1 Building Height.</u> 2. Retain matter of discretion reference to 'Impacts on neighbouring property – Rule 14.15.3a'. 3. Delete references to: Town Centre Intensification Precinct; and replace with 'Height Variation Overlay'.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Intensification Precinct is sought to be rezoned to HRZ.</p> <p>The HRZ is sought to have two height limit areas – a 22m limit for the majority of the area taking in what are currently the MRZ Local intensification precinct, and the Large Local Centre Intensification Precinct. The extent of the HRZ is proportionate to the size of the centre so large centres support a greater walkable catchment. But the height enabled in the HRZ remains the same at 22m.</p> <p>HRZ is sought 0-1.20km from the edge of the MCZ and the CCZ.</p> <p>A 36m 'Height Variation Control' is sought to apply 0-400m from the edge of the Metropolitan Centre Zone (as sought within this submission) (Riccarton, Hornby and Papanui centres).</p>	<p>4. Subject to the relief sought above, further consequential changes may be necessary to fully incorporate the effects of the zone changes discussed in the reason related to Metropolitan Centres.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>A 36m 'Height Variation Control' is sought to replace the High Density Residential Precinct and 0-400m from the edge of the CCZ.</p> <p>Rules controlling boundary setback, height to boundary, outdoor living space, and landscaping are all covered by other built form rules. The PC14 height to boundary rule requires at least a 6m setback from boundaries for buildings over 12m.</p> <p>Tall buildings are anticipated in the HRZ and therefore are sought to be permitted up to the height limit. Such buildings will remain subject to an assessment of qualitative urban design outcomes as covered by the urban design assessment matters for 4+ units.</p> <p>Buildings that exceed the height limits are RD, and subject to additional assessment of the</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				built form matters of discretion for height breaches.	
111.	Residential	14.6.1.3 RD13	Oppose	In accordance with our submission seeking deletion of the tree canopy financial contribution rule, the landscaping and tree canopy rule is sought to be deleted and replaced with the MDRS standard.	Delete the rule.
112.		RD17	Support in Part	<p>While Kāinga Ora does not oppose the potential need for wind assessments on tall buildings (above 6 storey), the concern lays around appropriateness of Matters of Discretion, the proposed height limits triggering an assessment and technical expertise available to carry out these assessments or determine if assessments (or anticipated effects) are appropriate.</p> <p>The rule should provide a permitted pathway. Buildings may separately breach height</p>	<ol style="list-style-type: none"> 1. Delete the rule. 2. As an alternative relief in the event that a regulatory approach to wind modelling is retained, redraft the rule to provide for a permitted pathway (for wind effects) where compliance with the specified performance standards is met. 3. Kāinga Ora seek that the provisions relating to wind effects are relocated to within the General Rules.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				rules but that is a separate matter (just as they will also invariably require consent under RD2 for more than 3 units).	
113.		D1 and NC1 –education, spiritual, heath, pre-school activities	Support in Part	<p>The Operative Plan has restrictive rules controlling non-residential activities within the City Centre (Four Avenues) due to historic pressure to develop such areas for non-residential use.</p> <p>The HRZ now extends much further than the City Centre, however the restrictive ‘4 Aves’ rules have been carried over so they now apply throughout the HRZ.</p> <p>The HRZ includes areas in close proximity to the larger commercial centres where the provision of a range of community facilities is very appropriate and has long been anticipated and provided for in the District Plan. Easy accessibility to such services</p>	<ol style="list-style-type: none"> 1. Retain Rule D1 for education, spiritual, heath, pre-school activities located inside the Four Avenues. 2. Adopt the MRZ provisions/ activity status for such activities located in the HRZ outside the Four Avenues.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>and facilities is likewise a key element in delivering well-functioning urban environments and good quality high density residential neighbourhoods.</p> <p>Whilst retention of the existing restrictive approach to such facilities inside the Four Avenues may be appropriate, the existing framework in the Residential Medium Density Zone is considered to be more appropriate for the HRZ areas outside of the Four Avenues.</p>	
114.		Add new provisions for retail, office, and commercial service activity on the ground floor of apartment buildings		<p>It is common for apartment buildings to contain a small-scale commercial activity on the ground floor, often adjacent to the entrance foyer and as a means of buffering residential activity from what can be busy frontage roads. The provision of such services can likewise have significant convenience benefits for residents and is consistent with a good quality, high density neighbourhood. The ability to provide shared workspaces in</p>	<p>Add a new restricted discretionary and fully discretionary rule as follows:</p> <p><u>Retail, office, and commercial service activity</u></p> <p><u>a. Activity status: Restricted Discretionary</u></p> <p><u>Where:</u></p> <p><u>i. The retail, office, or commercial service activity is limited to the</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				apartment buildings is consistent with emerging remote working trends where people still seek companionship during the day whilst working remotely from their employer. Provided the scale of non-residential facilities is limited there is minimal potential for such to undermine the role and function of nearby commercial centres which typically cover several hectares.	<p><u>ground floor tenancy of an apartment building;</u></p> <p><u>ii. The gross floor area of the activity/activities does not exceed 200m²; and</u></p> <p><u>iii. The hours of operation are between:</u></p> <p><u>i. 7.00am and 9.00pm Monday to Friday; and</u></p> <p><u>ii. 8.00am and 7.00pm Saturday, Sunday, and public holidays.</u></p> <p><u>The Council's discretion shall be limited to the following matters:</u></p> <p><u>a. The design, appearance and siting of the activity;</u></p> <p><u>b. Noise and illumination;</u></p> <p><u>c. Signage.</u></p> <p><u>2. Activity status: Discretionary</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<u>Where compliance is not achieved with the matters specified in HRZ-RX(a)(i), (ii) and/or (iii).</u>
115.		14.6.2 – Built form standards note	Oppose	<p>The built form rules start with a new note that the standards apply “to all permitted activities and restricted discretionary RD2” i.e. 3+ units.</p> <p>This note is ambiguous as it implies that the built form standards do not apply to any non-residential activities or activities that breach other RD, D or NC rules.</p> <p>It is questionable whether the note is necessary, but if it is to be retained it would be better placed in the ‘how to use the rules’ section. Kāinga Ora seek that it simply state that in addition to being subject to the activity standards, all buildings are also subject to the built form rules.</p>	<p>1. Delete the note. 2. As an alternative relief, if the note is to be retained, then relocate it to the ‘how to use the rules’ section 14.3 as follows:</p> <p><u>In addition to being subject to the activity standards, all buildings are also subject to the built form standards.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
116.		14.6.2.1 - Height	Support in Part	See discussion under RD7 and RD8 above.	Amend clause (a) of the rule as follows: a. Buildings must not exceed 14.22 metres in height above ground level; b. <u>Buildings located in the Height Variation Control overlay must not exceed 36 metres in height above ground level;</u>
117.		14.6.2.2 – Height to boundary	Support in Part	Kāinga Ora supports the encouragement of perimeter block development and building mass at front edge. However there is some concern over if the 20m, or 60% element of the provision is appropriate. For example, the 20m length should be increased to better align with standard block sizes in the High Density Zone. Kāinga Ora is also concerned, while the intent of the rule will achieve desired development outcomes, its drafting could be simplified.	Redraft provisions to improve clarity for plan users and ensure that dimensions referred to in the provision reflects block sizes within the High Density Zone.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
118.		14.6.2.3 - Setbacks	Support in Part	<p>Support clauses (a) and (b)(i) as implements MDRS as per Schedule 3A.</p> <p>Support clause (b)(ii) – support reduction in setbacks for accessory buildings, subject to the limitations to height and length in the rule. A grammatical amendment would be helpful to clarify that accessory buildings do not need to have internal access to the dwelling.</p> <p>Support clause (b)(iii) enabling eaves and gutters to project into the road boundary setback. Extend the eave exemption to 600mm to align with standard building practice, along with enabling deeper porches which have a strong functional benefit. Such projections have a minimal impact on streetscape amenity and can have benefits through providing greater articulation in the street-facing facade.</p>	<p>Retain clause (a) and (b)(i) as notified.</p> <p>Amend clause (b)(ii) and (iii) as follows:</p> <p>(b) This standard does not apply to site boundaries:</p> <p>(i)...</p> <p>(ii) side and rear setbacks: for accessory buildings or garages, including garages that internally access a residential unit, where the accessory building or garage is less than 3 metres in height and the total length of the building does not exceed 10.1m; and</p> <p>(iii) front boundary setbacks: where eaves, and roof overhangs, and porches up to 300mm 600mm in width and guttering up to 200mm in width from the wall of a building intrude into the boundary setback.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
119.		14.6.2.4 - Outlook Space	Support	Support as implements MDRS as per Schedule 3A. Minor amendment to clarify clause (i) is also supported.	Retain rule as notified
120.		14.6.2.5 – Building separation	Support in Part	<p>It is understood that the intent of the rule is to manage built form within the site i.e. the rule is to ensure separation between two towers on the same site, rather than provide separation with buildings on neighbouring sites (as separation to neighbours is managed through a combination of height to boundary, internal boundary setbacks and outlook space rules).</p> <p>The outcome of having reasonable space between taller built elements on the same site is supported, subject to the rule being amended to make its application clear.</p> <p>The other option is to delete the rule and rely on separation being addressed in part through the outlook space rule, plus</p>	<p>Delete the rule and replace as follows:</p> <p><u>Any parts of a building located more than 12m above ground level shall be separated by at least 10m from any other buildings on the same site that are also located more than 12m above ground level.</u></p> <p><u>Or alternatively, delete the rule entirely.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought									
				urban design assessment matters, and therefore this rule is unnecessary.										
121.		14.6.2.6 - Fencing	Support in Part	<p>Support 2m height limit on internal boundary fencing.</p> <p>The proposed rules will result in a significant loss of occupant amenity where outdoor living is located between the unit and the street. Whilst such a layout is not generally preferred, for east-west streets, the units on the southern side of the street will face north where it can often result in good design outcomes for the outdoor living to be located between the unit and the street to take advantage of the northern orientation.</p> <p>Retain the Operative Plan rules on road frontage fencing which are well understood by the design community and achieve an appropriate balance in occupant amenity and streetscape outcomes.</p>	<p>Retain clause (iii) relating to internal boundaries as notified.</p> <p>Delete clauses (i) and (ii) and replace with the following (Operative Plan rule and associated diagrams reinstated):</p> <table><tr><td></td><td>Fence type</td><td>standard</td></tr><tr><td>i</td><td><u>Where at least 50% of the fence structure is visually transparent</u></td><td><u>1.8m</u></td></tr><tr><td>ii</td><td><u>Where less than 50% of the fence structure is visually transparent</u></td><td><u>1.2m</u></td></tr></table>		Fence type	standard	i	<u>Where at least 50% of the fence structure is visually transparent</u>	<u>1.8m</u>	ii	<u>Where less than 50% of the fence structure is visually transparent</u>	<u>1.2m</u>
	Fence type	standard												
i	<u>Where at least 50% of the fence structure is visually transparent</u>	<u>1.8m</u>												
ii	<u>Where less than 50% of the fence structure is visually transparent</u>	<u>1.2m</u>												

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
122.		14.6.2.7 - Landscaping and tree cover	Oppose	<p>In accordance with our submission seeking deletion of the tree canopy financial contribution rule, the landscaping and tree canopy rule is also sought to be deleted and replaced with the MDRS standard.</p> <p>An additional clause is proposed for non-residential activities that aligns with the MDRS outcomes.</p>	<p>Delete rule and replace with the following:</p> <p><u>14.5.2.2 landscaped area</u></p> <p><u>(1) A residential unit at ground floor level must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p> <p><u>2. The landscaped area may be located on any part of the development site, and does not need to be associated with each residential unit.</u></p> <p><u>3. Non-residential activities must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p>
123.		14.6.2.8 - Windows to street	Support in Part	<p>Clause (a) of the rule implements MDRS as per Schedule 3A.</p>	<p>Retain clause (a)-(d) as notified.</p> <p>Delete clause (e).</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Clause (b) re excluding gables is supported.</p> <p>Clause (c) relating to units with large streetscene setbacks is also supported as the large setbacks meant that the streetscene outcomes sought by the rule are less relevant.</p> <p>Clause (d) to incentivise front doors and their contribution towards an attractive street façade is supported.</p> <p>Clause (e), whilst trying to be enabling, adds considerable (and unnecessary) complexity to the rule for little gain.</p>	
124.		14.6.2.9 – Ground floor habitable rooms	Support in Part	<p>The Operative Plan includes a rule controlling ground floor habitable rooms which is well-established and appears to be working well.</p> <p>There are two key design outcomes sought, namely 1) the ground floor on the road</p>	<p>Amend the rule as follows:</p> <p>a. Any building that includes a residential unit shall:</p> <p>i. Where the residential unit fronts a road or public open space, unless built over a separate ground floor residential unit, have a habitable room located at ground floor level</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>frontage is habitable space rather than garaging in order to deliver positive streetscape outcomes; and 2) that at least 50% of the ground floor across the site is habitable space, to avoid the ground floor of complexes being overly dominated by garaging and undercroft parking areas.</p> <p>The proposed rule is sought to be amended to better articulate these two outcomes and to avoid developments arranged as horizontally stacked low-rise apartments being unnecessarily penalised through a requirement for every unit to individually have ground floor space.</p> <p>The outcome of 50% habitable at ground floor across a site is an appropriate outcome for HRZ.</p>	<p>with a minimum internal dimension of 3 metres; and</p> <p>ii. Any residential unit shall have at least 50% of any ground floor area as habitable rooms.</p> <p>a. <u>Where a residential unit fronts a road or public open space, it shall have a habitable room with a minimum internal dimension of 3 metres located at the ground floor level facing the frontage. This rule does not apply to upper-level units that are built over a separate ground floor residential unit; and</u></p> <p>b. have at least 50% of any ground floor area as habitable rooms, except on sites where at least 25% of the building footprint is more than 4 storeys, which shall have at least 30% of any ground floor area as habitable rooms.</p> <p><u>A minimum of 50% of the ground floor area across the site shall be occupied by habitable spaces and/or indoor communal living space. This area may include pedestrian access to lifts, stairs, and foyers.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
125.		14.6.2.10 - Outdoor living space	support	<p>Clauses (a) and (b) implement MDRS as per Schedule 3A</p> <p>Clause (c) provides a useful reduction for studio/ 1 bed units to 15m² (ground floor) or 6m² balcony if located above ground floor.</p>	Retain rule as notified.
126.		14.6.2.11 – Storage space	Support in Part	<p>The requirement for outdoor storage for bins and washing lines is an Operative Plan rule that appears to be working well.</p> <p>Clause (a) relating to outdoor storage is supported, although may be an unnecessary level of regulation if this matter is covered by urban design assessment matters.</p> <p>Clause (b) is a new rule in PC14. It requires a minimum amount of internal storage to be provided. Whilst internal storage spaces are useful, this rule is considered to be an unnecessary level of regulation.</p>	<ol style="list-style-type: none"> 1. Retain clause (a), noting that if outdoor storage is addressed as an urban design assessment matter then a separate rule may be unnecessary. 2. Delete clause (b).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				It is noted that clause (a) only applies to 4 or more units, while clause (b) applies to all units i.e. it is unclear what the rationale is behind the different number of units that trigger the clauses.	
127.		14.6.2.12 - Building coverage	Support in Part	<p>The rule implements MDRS as per Schedule 3A.</p> <p>Support additional exemption for eaves and guttering, although this is sought to be extended to 600mm which is a standard eave depth and better provides for weather tightness design solutions. Eaves do not have a significant impact on visual dominance, and setbacks from neighbours are controlled through separate rules on internal setbacks and height-to-boundary.</p> <p>Clause (a)(ii) seeks to enable greater site coverage in the HRZ. An increase to 60% is supported and is a useful tool in differentiating between MRZ</p>	<ol style="list-style-type: none"> 1. Amend as follows: <ol style="list-style-type: none"> a. <u>The maximum building coverage must not exceed 50 60% of the net site area;</u> <ol style="list-style-type: none"> i. <u>Any eaves and roof overhangs up to 300mm 600mm in width and guttering up to 200mm in width from the wall of a building shall not be included in the building coverage calculation.</u> 2. Delete Clause (a)(ii).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				and HRZ. The proposed clause is however unnecessarily complex, with outdoor space and landscaping both subject to other rules and noting that the proposed ground floor habitable space rule will also necessitate the provision of ground floor outdoor living spaces.	
128.		14.6.2.13 – water supply for fire fighting	Neutral		
129.		14.6.2.14 - Garaging	Oppose	<p>Whilst the equivalent rule in the MRZ requires garaging to be recessed behind the front façade, this rule requires garaging to be located behind the rear façade of a residential unit.</p> <p>This rule is unworkable for carparking levels in apartment buildings where such parking is invariably located beneath (or above) a residential unit rather than behind the unit's rear façade.</p>	<p>Delete the rule and replace as follows:</p> <p><u>14.6.2.14 garaging and carports</u></p> <p><u>Where a residential unit fronts towards a road, any garage or carport shall be located at least 1.2 metres behind the front façade of a residential unit.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>For smaller scale developments ie. 2-3 storey, having parking recessed behind the front façade provides an acceptable outcome, in combination with the urban design assessment matters for 4+ units.</p> <p>The rule wording sought in the equivalent rule in the MRZ is considered to be equally applicable.</p>	
130.		14.6.2.15 – Location of mechanical ventilation	Oppose	<p>New rule that requires a 3m setback if at ground level between a residential unit and the road or a shared accessway. Presumably it is visual effects that are the concern.</p> <p>Level of design detail that is unnecessary to regulate. If mounted at ground level then even a short 1.2m high fence is sufficient to visually screen in a similar manner to the proposed rule on bin storage.</p>	Delete the rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				As drafted the rule applies to mechanical units on the ground, whereas they would be permitted if wall-mounted despite having a worse visual outcome. It also applies to mechanical units located adjacent to internal boundaries where the property next door (over the fence) has an accessway.	
131.		14.6.2.16 - Minimum unit sizes	Support	No amendments are proposed to the Operative Plan rule on minimum unit sizes. This rule is well-established and appears to be working well.	Retain rule as notified.
132.		14.6.2.17 - Spine road setbacks	Oppose	<p>The new rule requires buildings and outdoor living spaces to be set back 4m from spine road corridors (where the corridor is less than 24m in width).</p> <p>It is understood that the intention of the rule is to enable road widening in the future to accommodate public rapid transit. If Council's intention is to acquire land in the future to</p>	<p>Delete the rule.</p> <p>If land acquisition for public works is the intent, then Council should initiate a Notice of Requirement to designate the corridor.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>facilitate public works then it should use the designation powers available to it.</p> <p>Given the highly developed nature of these existing corridors with lengthy sections of commercial property built to the road boundary, it is unclear how any corridor-long road widening will occur without major land acquisition and demolition.</p>	
14.7 – Residential Hills Zone					
133.				<p>The Residential Hills zone is an existing Operative Plan zone that covers the Port Hills Suburbs. PC14 as notified includes a QM on public transport accessibility. Areas that fall within this QM retain their existing low-density Operative Plan zoning.</p> <p>It would appear that the public transport QM is the only QM</p>	Delete zone and replace with MDZ.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				that is generating the need to retain the Residential Hills Zone. Given our submission that the public transport QM is not a valid QM and is sought to be deleted, a consequence is that the Residential Port Hills Zone is also sought to be deleted and replaced by MRZ	
14.12 – Future Urban Zone					
134.				See above discussion on Objective 14.2.8. The Future Urban Zone ('FUZ') is a relabelling of Residential New Neighbourhood Zone. This is the wrong label and not the intention of the National Planning Standards. FUZ are a mechanism for signalling rural areas that will be urbanised at some point in the future as a holding pattern, with the 'live' zone to be developed at a later date through a subsequent plan change process. RNN are existing well-established live	Delete the FUZ and replace with MDRZ. The associated rules relating to build-out of these areas/ compliance with ODPs, or any area-specific rules can equally be located at the end of the MDRZ provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				zones (albeit that some of them are still being built out). These areas are sought to simply be MDRZ unless there is a qualifying matter in play that would preclude MDRZ zoning.	
14.14 – Community Housing Redevelopment Mechanism					
136.	Chapter 14.14 – Community Housing Redevelopment Mechanism	Whole Chapter	Support	Kāinga Ora supports the deletion of the Community Housing Redevelopment Mechanism, provided Plan Change 14 is consistent with the MDRS and NPS-UD.	Kāinga Ora supports the deletion of the Community Housing Redevelopment Mechanism, provided Plan Change 14 is amended consistent with the relief sought in this submission.
Chapter 15 - Commercial					
137.		Related to the commercial chapter as a whole	Support in part	Kāinga Ora seeks that Metropolitan Centres are introduced within the centres hierarchy, as per the forward-looking aspects of the NPS-UD policies of 1, 3, and 6. These are sought to cover the existing key activity areas for Riccarton, Papanui, and Hornby. The size,	<ol style="list-style-type: none"> 1. Insert reference to Metropolitan Centres in all relevant provisions of the chapter. 2. Insert rules for metropolitan centre zone as attached in Appendix 2.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>scale, existing and future function of these centres are such that they merit the application of a Metropolitan Centre Zone classification, and thus an appropriate objective, policy and rules framework.</p> <p>Further, recent and proposed investment in public and active transport modes along the corridors in which these activity centres are located support the case for a zoning classification reflective of their relative position within the centres hierarchy.</p>	
Chapter 15.2 – Commercial Policy framework					
138.		Policy 15.2.2.1, Table 15.1 – Commercial zone titles	Support in part	<p>Support amendments to Table 15.1 of Policy 15.2.2.1 in so far as these reflect National Planning Standards nomenclature.</p> <p>Kāinga Ora</p>	<p>Realignment of Commercial Zone names with National Planning Standard (NPS) zone descriptions (Chapter 2 Interpretation). The allocation of centres to the NPS labelling appears generally appropriate if Metropolitan Centre is added.</p> <p>B. Town Centre: Key Activity Centre:</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>Retain reference to '<i>High Density Housing is contemplated ... and around larger local centres</i>'.</p> <p>C. Local Centres: Retain reference to '<i>High Density Housing is contemplated ... and around larger local centres</i>'.</p>
138.		Table 15.1 - Centre hierarchy		<p>The role and function of centres has a direct bearing on the associated geographic extent and zoning of high density residential zoning around the centre. The hierarchy needs to reflect both current condition and potential future state in the event that enabled development occurs.</p> <p>The centre hierarchy for Local Centres in particular is considered to be unnecessarily complex and it is sought that these be simplified, along with a commensurate simplification in the heights and zoning of the surrounding residential area.</p>	<ol style="list-style-type: none"> 1. Amend role and function of Church Corner, Sydenham and Merivale from 'Local Centre (Large)' to 'Town Centre'. 2. Consolidate all Local Centres into a simple category i.e. delete the distinction between 'small' and 'medium'. 3. Incorporate Metropolitan centres and relabel Riccarton, Hornby, Papanui Northlands as such and as shown within Appendix 3.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Church Corner, Sydenham and Merivale are evolving and will be establishing a substantial residential catchment through development enabled by PC14. In addition, these 'centres' are positioned within corridors identified as Mass Transit Network and Growth Corridors within the Greater Christchurch 'Huihui Mai' Consultation Plan for accommodating Growth to 2050. The corresponding Council s32 Report 'Commercial Appendix 2' identifies such centres as performing a greater role in intensification enablement and diversity of function.</p> <p>The large local centres should be town centres, with small and medium local centres merged into a single 'local centre' category.</p>	
139.		Policy 15.2.2.7 – Residential activity in centres	Support in part	Amend so that the provision also provides for residential activity within Neighbourhood centres. Rule 15.5.1.1.1(P19)	Amend Policy 15.2.2.7 as follows: Residential activity in district Town, and

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				provides for such above ground floor, or to the rear of the premises fronting the street.	Local <u>and neighbourhood</u> centres Residential activity in district town , <u>and</u> Local <u>and neighbourhood</u> neighbourhood centres
140.		Objective 15.2.3(b) – Mixed use areas	Support in part	<p>Kāinga Ora support the principle of providing for Mixed Use Zones proximate to the City Centre Zone to transition to higher density residential neighbourhoods.</p> <p>The application of the provision is unclear however. The 'Objective Heading' refers to mixed use <u>outside the central city</u>. Central City is defined (in the operative Plan) as that part of the City contained within the four avenues. Whereas the amendment to Chapter 2 Interpretation to introduce 'City Centre – means the City Centre Zone'.</p> <p>This confusion is then reinforced in Policy 15.2.3.2 where the 'heading' references Mixed Use Zones outside the central city, then conflicts with</p>	<p>Amend the objective as follows:</p> <p>15.1.1 Objective - Office parks and mixed use areas <u>outside the central city (except the Central City Mixed Use and Central City Mixed Use (South) Zones)</u>.</p> <p>a. Recognise the existing nature, scale and extent of commercial activity within the Commercial Office and Commercial Mixed Use Zones, but avoid the expansion of existing, or the development of new, office parks and/or mixed use areas.</p> <p>b. <u>Mixed use zones located within a 15min walking distance of close to the City Centre Zone transition into high density residential neighbourhoods that contribute to an improved</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>(b) which references increased opportunities within a 15 minute walking distance of the City Centre Zone (which would therefore include the Commercial Central City Mixed Use and Central City Mixed Use (South Frame) zones). If the aim is to deliberately exclude the Central City Mixed Use and South Frame Zones, this should be made clear, and Policy 15.2.7.1 'Diversity of Activities' amended to encourage a transition into good quality residential neighbourhoods.</p> <p>'Close' should be replaced by explicit reference to the respective zones (presumed to be the 15-minute walking distance in Policy 15.2.3.2(b)).</p> <p>Referencing a reduction in greenhouse gas emissions is superfluous in this context, given proximity and modal choice.</p>	<p><u>diversity of housing type, tenure and affordability</u> and support a reduction in greenhouse gas emissions.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				The intent and objectives of these amendments to the plan change do not seem to be achievable through the rules proposed. Kāinga Ora submits that it may be more appropriate to consider these zone changes and rules through a subsequent schedule 1 process.	
141.		Policy 15.2.3.2 – Mixed use	Support in part	<p>Amend 'outside the central city' as above.</p> <p>A 'high quality' residential neighbourhood is subjective and is referenced in terms of residential zone outcomes (Objective 14.2.4). Such is an inappropriately high threshold for residential development in a transitioning and Mixed Use zone. Contributing positively to quality and design is sufficient.</p> <p>Delete reference to 'reducing greenhouse gas emissions' as this would be immaterial at this scale, and the areas are zoned for mixed use which anticipates residential activity being</p>	<p>Amend as follows:</p> <p>15.2.3.2 Policy – Mixed use areas outside the central city (except the Central City Mixed Use and Central City Mixed Use (South) Zones)</p> <p>a. Recognise the existing nature, scale and extent of retail activities and offices <u>in mixed use zones outside the central city in Addington, New Brighton, off Mandeville Street and adjoining Blenheim Road</u>, while limiting their future growth and development to ensure commercial activity in the City is focussed within the network of commercial centres.</p> <p>b. <u>Support mixed use zones at</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>proximate to necessary facilities / employment thereby reducing trip journeys. Support for greater housing diversity and including 'alternative housing models' although noting that these are not well defined (Chapter 2 Interpretation).</p> <p>The greenway requirements in Appendix 15.15.12 and 15.15.13 are problematic to implement given the fragmented ownership of these areas. The provision of small parks and greenlinks is a matter for Council to facilitate through LGA processes and a more comprehensive place-making programme that will be vital in supporting a shift from industrial to mixed use neighbourhoods. If specific greenlinks are considered to be vital then the Council should use its designation powers to secure these spaces as a more efficient and effective method than the proposed comprehensive housing rules.</p>	<p><u>Sydenham, Addington, off Mandeville Street, and Philipstown located within a 15 minute walking distance of the City Centre Zone, to transition into high good quality residential neighbourhoods by:</u></p> <ul style="list-style-type: none"> i. <u>enabling comprehensively designed high-good-quality, high-density residential activity;</u> ii. <u>ensuring that the location, form and layout of residential development supports the objective of reducing greenhouse gas emissions and provides for greater housing diversity including alternative housing models;</u> iii. <u>requiring developments to achieve a high-good standard of on-site residential amenity to offset and improve the current low amenity industrial environment and mitigate potential conflicts between</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p><u>uses;</u></p> <p>iv. <u>encourage small-scale building conversions to residential use where they support sustainable re-use and provide high-good quality living space, and contribute to the visual interest of the area.</u></p> <p>c. Avoid Comprehensive Residential Development of sites within the Comprehensive Housing Precinct that are identified in Appendix 15.15.12 and 15.15.13 unless the relevant shared pedestrian/cycleway, greenway or road connection is provided.</p> <p>d. For sites identified within Appendix 15.15.12 and 15.15.13 encourage the connection to facilitate convenient and accessible through block connectivity.</p>
142.		Objective 15.2.4 – urban form	Support	No changes necessary.	Retain the objective as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
143.		Policy 15.2.4.1 – scale and form	Support in part	<p>The foundation of this policy is found within Policy 3 of the NPS – UD. That Policy requires at clause (a) within city centre zones, building heights and density of urban form to realise as much development capacity as possible. Accordingly, the current wording of clause (i) to (v) which seek to limit building height is not supported.</p> <p>For clause (b)(i) the duplication associated with the amendment can be removed.</p> <p>For clause(b)(ii) it is considered that the District Plan should be forward looking, hence the need for building heights to be commensurate with their 'anticipated' role.</p>	<p>1. Amend Clause (a) as follows:</p> <p>15.2.4.1 Policy – Scale and form of development</p> <p>a. Provide for development of a <u>significant</u> scale and form <u>massing that reinforces the City's City Centre Zone's distinctive sense of place and a legible urban form by enabling as much development capacity as possible to maximise the benefits of intensification, whilst managing building heights adjoining Cathedral Square, Victoria Street, New Regent High Street and the Arts Centre to account for recognised heritage and character values.</u> in the core of District Centres and Neighbourhood Centres, and of a lesser scale and form on the fringe of these centres.</p> <p>2. Delete Clause (a)(i)-(v).</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>1. Amend Clause (b) as follows:</p> <p>b. The scale and form of development in <u>other commercial</u> centres shall:</p> <p style="padding-left: 40px;">i. reflect the context, character and the anticipated scale of the zone and centre's function <u>by</u>:</p> <p style="padding-left: 40px;"><u>ii. providing for the tallest buildings and greatest scale of development in the city centre to reinforce its primacy for Greater Christchurch and enable as much development capacity as possible to maximise the benefits of intensification;...</u></p> <p>2. Retain the remaining parts of clause (b) as notified.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
144.		Policy 15.2.4.2 - design	Oppose	There is no basis within the MDMR Act nor NPS-UD that facilitates or provides support for the inclusion of these provisions. It is considered that the provisions introduced would function to limit or reduce potential development capacity. The provisions are not accompanied by a comprehensive s32, do not adequately recognise the functional requirements associated with commercial developments, and would not be the more appropriate in terms of achieving Objective 3.3.1 and 3.3.2 of the Plan.	Delete all inclusions introduced and retain existing Operative Plan Policy 15.2.4.2.
145.		Policy 15.2.4.6 – Strategic Infrastructure	Support in Part	This policy contains operative plan wordings using the term ‘avoiding’ in relation to noise sensitive activities and the Airport Noise Influence Area, we seek amendment to this wording to reflect management solutions are appropriate.	Amend policy 15.2.4.6 as follows: Provide for the effective development, operation, maintenance and upgrade of strategic infrastructure and avoid adverse effects of development on strategic infrastructure through managing the location of activities and the design of stormwater areas. This includes but is not limited to, managing noise sensitive activities within commercial zones

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					located within the 50-dB Ldn Air Noise Contour and within the Lyttelton Port Influences Overlay Area.
146.		Objective 15.2.5(a)(i)	Support in Part	This policy contains existing Operative Plan wording that's no longer appropriate "...and limiting the height of buildings to support an intensity of commercial activity across the zone".	<p>Amend Objective 15.2.5 as follows:</p> <ul style="list-style-type: none"> a. A range of commercial activities, community activities, cultural activities, residential activities and guest visitor accommodation are supported in the Central City to enhance its viability, vitality and the efficiency of resources, while encouraging activities in specific areas by: <ul style="list-style-type: none"> i. Defining the Commercial Central City Business City Centre Zone as the focus of retail activities and offices and limiting the height of buildings to support an intensity of commercial activity across the zone;

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
147.	Central City	Policy 15.2.6.3 - Amenity	Support in part	<p>Deletion of the operative clause (ii) is supported.</p> <p>Seek deletion or amendment of inserted clause (ii) which acts as a proxy to otherwise limit height contrary to the statutory requirement of Policy 3 of the NPS-UD.</p>	<ol style="list-style-type: none"> 1. Support the deletion of existing clause (a)(ii). 2. Delete the replacement Clause (a)(ii).
148.	Central City	Policy 15.2.6.4 – Residential intensification	Support in part	<p>Seek moderation of the qualifier 'high quality' to either good, or 'positively contributes'.</p>	<p>Amend Policy 15.2.6.4(a) as follows:</p> <p>Encourage the intensification of residential activity within the Commercial Central City Business City Centre Zone by enabling high-good quality residential development that positively contributes to supports a range of types of residential development typologies, tenures and prices, with an appropriate level of amenity including:...</p>
149.	Central City	Policy 15.2.6.5 – Pedestrian focus	Oppose	<p>Delete the PC14 amendment relating to 'wind generation'. It is not considered that the respective s32 analysis demonstrates that such limits/</p>	<p>Amend Policy 15.2.6.5(ii) as follows:</p> <p>ii. requiring development to support a</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				wind rules are the most efficient or effective method.	pedestrian focus through controls over building location and continuity, weather protection, height, wind generation , sunlight admission, and the location of parking areas;
150.	Central City Mixed Use Zone	Objective 15.2.7 – central city mixed use	Oppose	Delete insertion of reference to 'high quality' as inappropriate in this context.	15.2.7 Objective – Role of the Central City Mixed Use Zone a. The development of vibrant, high good quality urban areas where a diverse and compatible mix of activities can coexist in support of the Commercial Central City Business City Centre Zone and other areas within the Central City Central City .
151.	Central City Mixed Use Zone	Policy 15.2.7.1 – diversity of activities	Support in part	The Central City mixed use zone is well located within easy walking and cycling distance of the wide range of services and facilities on offer. As such the height limit is sought to reflect such proximity and not be tagged or limited to colocation with large faculties, as the whole of the zone is well-	<u>Amend Clause (a)(viii) as follows:</u> viii. opportunities for taller buildings to <u>accommodate residential activity and visitor accommodation, to support the vibrancy of the City Centre Zone, where co-located with the and the nearby large-scale community facilities, Te Kaha</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				located in close proximity to these facilities.	<u>and Parakiore.</u>
152.	Central City Mixed Use Zone	Policy 15.2.8.1 - usability, Policy 15.2.8.2 - amenity	Oppose	<p>The amenity provisions introduced are too fine grain to be set as policies, are unsubstantiated by s32 analysis, do not respond to a resource management issue, and would act as detriment to development. Kāinga Ora seek that these be deleted.</p> <p>Policy 15.2.8.2(viii) is not opposed, subject to the amendments sought above as to setting an appropriate urban design context, and not set at 'high quality'.</p>	<ol style="list-style-type: none"> 1. Retain Policy 15.2.8.1 as existing in the Operative Plan and delete all PC14 amendments. 2. Retain Policy 15.2.8.2 as existing in the Operative Plan and delete all PC14 amendments, with the exception of clause (viii) which is sought to be retained.
153.	Central City Mixed Use Zone	Policy 15.2.8.3 – residential development	Oppose	The requirements in the NPS-UD to facilitate differing housing typologies and provide intensification opportunities is disenabled by provisions seeking excessive private amenity space.	<p>Delete amendments seeking improved private amenity space, compensatory to the predominantly commercial nature of the Central City Mixed Use Zone.</p> <p>15.2.8.3 Policy Residential Development</p> <p>a. provide for ...</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>b. <u>Require a level of private amenity space for residents that is proportionate to the extent of residential activity proposed.</u> and which compensates for the predominantly commercial nature of the area, including consistent with the intended built form and mix of activities within that environment, through:...</p>
154.	Central City Mixed Use Zone (South Frame)	Policy 15.2.10.2 – residential development	Support	Policy amendments appropriately recognise area context.	Retain policy as notified
15.4 – Commercial Zone rules					
155.	Town Centre Zone Rules Local Centre Rules Neighbourhood Centre Zone	City Spine Transport Corridor 15.4.1.3(RD8) 15.5.1.3(RD8) 15.6.1.3(RD7)	Oppose	Delete the provision in its entirety. The provision is not justified in terms of s32, is not the most appropriate mechanism to secure increased road widths, or proxy road reserve planting and landscaping at the expense of developable area. Provision and Qualifying matter is not	Delete all City Spine Transport Corridor activity rules from the suite of commercial zones.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	Large Format Retail Zone Mixed Use Zone	15.8.1.3(RD3) 15.10.2.10		supported by Policy 4/ clause 3.32 of the NPS-UD. Inconsistency with design outcomes specified in Rule 15.4.2.3, including clause (i) Key Pedestrian Frontages as associated with Riccarton, Church Corner, Merivale and Papanui Centres. If road widening is required to facilitate rapid transit infrastructure then Council should use its designating powers.	
156.	Town Centre Zone Built Form Standards Local Centre Built Form Standards	15.4.2.1(a)(ii) 15.5.2.1(a)(i)	Oppose / cl16(b)	Delete erroneous reference to Local Centre in 15.4.2.1(a)(ii) Delete erroneous reference to Town Centre in 15.5.2.1(a)(i)	ii. 1,000m² GLFA where located in a Neighbourhood Local Centre identified in Policy 15.2.2.1, Table 15.1 ii. 4,000m² GLFA where located in a District Town Centre as identified in Policy 15.2.2.1, Table 15.1; or
157.	Town Centre Zone Built Form Standards	14.4.2.2 Maximum Building Height	Support in part	Increased development capacity is sought to be enabled specifically at Hornby,	1. Adopt Metropolitan Centre Zone Rules proposed in the Kāinga Ora submission Appendix 2 and amend

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought												
				<p>Riccarton and Papanui noting that the role and function of these centres is already straddling that associated with the role and function of Metropolitan Centres as set out within the National Planning Standards. The adoption of the Metropolitan Centre Rules Kāinga Ora seeks would take into account that role and function (including social amenity) would be anticipated to grow and diversify given the anticipated level of residential catchment growth. An appropriate height limit is accordingly 36m.</p> <p>For the remaining Town Centres, noting anticipated corridor growth and development as associated with Sydenham, Merivale and Church Corner (elevating these centres to Town Centres in the retail hierarchy) (refer submission to Table 15.1) a height limit of 22m is the more appropriate.</p>	<p>these rules as appropriate.</p> <p>2. Amend rule 14.4.2.2 as follows:</p> <p>a. The maximum height of any building shall be as follows:</p> <table><tr><th></th><th>Applicable to</th><th>Standard</th></tr><tr><td>i.</td><td>All sites in a District Town Centre (other than specified below)</td><td>220 metres</td></tr><tr><td>ii.</td><td><u>All sites in a Town Centre at Riccarton, or Hornby or Papanui</u></td><td><u>22 metres</u></td></tr><tr><td>iii.</td><td>...</td><td></td></tr></table>		Applicable to	Standard	i.	All sites in a District Town Centre (other than specified below)	220 metres	ii.	<u>All sites in a Town Centre at Riccarton, or Hornby or Papanui</u>	<u>22 metres</u>	iii.	...	
	Applicable to	Standard															
i.	All sites in a District Town Centre (other than specified below)	220 metres															
ii.	<u>All sites in a Town Centre at Riccarton, or Hornby or Papanui</u>	<u>22 metres</u>															
iii.	...																

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
158.	Town Centre Zone Built Form Standards	Sunlight and Outlook 15.4.2.5	Oppose in part	Refer submission point relating to amended Recession Planes as a Qualifying Matter and changes to Appendix 14.16.2.	Consequential amendments associated with Appendix 14.16.2. Adopt Metropolitan Centre Zone Rules proposed in the Kāinga Ora submission Appendix 2 and amend these rules as appropriate.
	Local Centre Zone Standards	15.5.2.5			
	Neighbourhood Centre Zone Standards	15.6.2.4			
	Large Format Zone	15.8.2.4			
	Commercial Office Zone	15.9.2.4			
	Mixed Use Zone	15.10.2.4			
	City Centre Zone	15.11.2.9			
	Central City Mixed Use Zone	15.12.2.6			

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
159.	Town Centre Zone Built Form Standards Local Centre Zone Standards Neighbourhood Centre Zone Standards Large Format Zone Mixed Use Zone City Centre – Mixed Use Zone	City Spine Transport Corridor 15.4.2.10 15.5.2.10 15.6.2.11 15.8.2.13 15.10.1.3 (RD5) 15.12.2.13 / 15.12.1.3(RD6)	Oppose	Delete the provision in its entirety. The provision is not justified in terms of s32, is not the most appropriate mechanism to secure increased road widths, or proxy road reserve planting and landscaping at the expense of developable area. Provision and Qualifying matter is not supported by Policy 4/ clause 3.32 of the NPS-UD.	Delete all City Spine Transport Corridor built form rules from the suite of commercial zones.						
160	Local Centre Zone Built Form Rules – Maximum Building Height	15.5.2.2		Support in part As identified in the submission point on Town Centre heights – Merivale, Church Corner and Sydenham are sought to be elevated to a ‘Town Centre’ zone and provided with a 22m height limit.	Replace the table in 15.5.2.2 as follows (with Merivale, Church Corner and Sydenham elevated in Table 15.1 to Town Centre zoning): <table><tr><th></th><th>Applicable to</th><th>Standard</th></tr><tr><td>ii</td><td>Ferrymead and all sites in a Local Centre (medium)</td><td>20 metres</td></tr></table>		Applicable to	Standard	ii	Ferrymead and all sites in a Local Centre (medium)	20 metres
	Applicable to	Standard									
ii	Ferrymead and all sites in a Local Centre (medium)	20 metres									

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought												
				<p>In the alternative, they are sought to be afforded a 22m height limit as Local Centre (Large).</p> <p>As sought above the remaining medium centres and Ferrymeed are sought to become ‘large’ Local Centres, with the ‘small’ Local Centres simply being ‘local centres’.</p> <p>In terms of heights, the new large centres are sought to have a consistent 22m height limit to provide for additional capacity and conformity with the proposed HRZ height limits adjoining these centres within this submission. The exception is New Brighton, given qualifying matters associated with appropriate natural hazards reduce intensification opportunities.</p> <p>All remaining Neighbourhood Centres are sought to have a standard height limit of 14m to provide a scale commensurate</p>	<table><tr><td></td><td><u>as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u></td><td></td></tr><tr><td>ii.</td><td><u>New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1</u></td><td><u>14metres</u></td></tr></table> <p>Or in the alternative:</p> <p>15.5.2.2 Maximum building height</p> <p>a. The maximum height of any building shall be as follows:</p> <table><tr><th></th><th>Applicable to</th><th>Standard</th></tr><tr><td>i</td><td><u>Merivale, Church Corner and Sydenham North (Colombo Street between Brougham Street and Moorhouse Avenue)</u></td><td><u>22 metres</u></td></tr></table>		<u>as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u>		ii.	<u>New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1</u>	<u>14metres</u>		Applicable to	Standard	i	<u>Merivale, Church Corner and Sydenham North (Colombo Street between Brougham Street and Moorhouse Avenue)</u>	<u>22 metres</u>
	<u>as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u>																
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ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought															
				with the surrounding MRZ areas and to differentiate from the 12m height limit applying to Neighbourhood Centres.	<table><tr><td>ii</td><td><u>Ferryhead and all sites in a Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u></td><td>20 metres</td></tr><tr><td>ii.</td><td>New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1</td><td>14 metres</td></tr><tr><td>i.</td><td>All sites in a District Centre</td><td>20 metres</td></tr><tr><td>ii.</td><td>Any building in a District Centre within 30 metres of an internal boundary with a residential zone</td><td>12 metres</td></tr><tr><td>iii. i.</td><td><u>All sites in a Neighbourhood Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1.</u></td><td><u>12 metres</u></td></tr></table>	ii	<u>Ferryhead and all sites in a Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u>	20 metres	ii.	New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1	14 metres	i.	All sites in a District Centre	20 metres	ii.	Any building in a District Centre within 30 metres of an internal boundary with a residential zone	12 metres	iii. i.	<u>All sites in a Neighbourhood Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1.</u>	<u>12 metres</u>
ii	<u>Ferryhead and all sites in a Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u>	20 metres																		
ii.	New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1	14 metres																		
i.	All sites in a District Centre	20 metres																		
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iii. i.	<u>All sites in a Neighbourhood Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1.</u>	<u>12 metres</u>																		

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought									
					<table><tr><td>iv.</td><td>Other locations</td><td>17 metres</td></tr><tr><td>ii.</td><td>All sites in a Neighbourhood Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1.</td><td>14 metres</td></tr><tr><td>iii.</td><td>All sites in a Neighbourhood Local Centre (large) as identified in Table 15.1 of Policy 15.2.2.1.</td><td>20 metres</td></tr></table>	iv.	Other locations	17 metres	ii.	All sites in a Neighbourhood Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1.	14 metres	iii.	All sites in a Neighbourhood Local Centre (large) as identified in Table 15.1 of Policy 15.2.2.1.	20 metres
iv.	Other locations	17 metres												
ii.	All sites in a Neighbourhood Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1.	14 metres												
iii.	All sites in a Neighbourhood Local Centre (large) as identified in Table 15.1 of Policy 15.2.2.1.	20 metres												
161.	Neighbourhood Centre Zone – Built Form Standards	15.6.2.1 - Height	Support in part	<p>The increase in height of buildings from 8m to 12m is supported.</p> <p>Within the Central City, an increased height to 32m is the more appropriate, given these areas are surrounded by HRZ.</p>	<p>Amend rule 15.6.2.1 as follows:</p> <p>15.6.2.1 Maximum Building Height</p> <p>a. The maximum height of any building shall be as follows:</p> <table><tr><th></th><th>Applicable to</th><th>Standard</th></tr><tr><td>i.</td><td>All sites unless specified below</td><td>8 <u>12</u> metres</td></tr><tr><td>ii.</td><td>For sites within the Central City</td><td></td></tr></table>		Applicable to	Standard	i.	All sites unless specified below	8 <u>12</u> metres	ii.	For sites within the Central City	
	Applicable to	Standard												
i.	All sites unless specified below	8 <u>12</u> metres												
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ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
					<table><tr><td><u>located:</u></td><td><u>20m</u></td></tr><tr><td>a. <u>To the east of Barbadoes Street</u></td><td><u>32m</u></td></tr><tr><td>b. <u>To the west of Barbadoes Street</u></td><td></td></tr></table>	<u>located:</u>	<u>20m</u>	a. <u>To the east of Barbadoes Street</u>	<u>32m</u>	b. <u>To the west of Barbadoes Street</u>	
<u>located:</u>	<u>20m</u>										
a. <u>To the east of Barbadoes Street</u>	<u>32m</u>										
b. <u>To the west of Barbadoes Street</u>											
162.	Mixed Use Zone	15.10.1.1 Activity rules	Support in Part	<p>Support the enablement of residential in P27, subject to deletion of the 'Comprehensive Housing Precinct'.</p> <p>The rule framework does not enable the suite of community activities that are inherent in good quality mixed use neighbourhoods. The rule framework must enable activities such as preschools, education, spiritual, health, community faculties, and convenience retail to support the emergence of a genuinely mixed use neighbourhood. The activity standards for these activities in the MRZ are equally</p>	<ol style="list-style-type: none">1. Amend P27 to delete clause (b) relating to the Comprehensive Housing Precinct.2. Add additional activity rules enabling a suite of community activities i.e. rules 14.5.1.1 P5-P13, P20.						

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>appropriate and set appropriate limits on activity size to ensure effects of larger facilities are able to be assessed.</p> <p>Such activities do not generally give rise to retail distribution effects, and will not give rise to reverse sensitivity effects given the clear change in outcomes sought for these areas and the enablement of residential activity throughout the mixed use zone.</p>	
163.	Mixed Use Zone	15.10.2.1 - Height	Support in part	<p>The insertion of (b) providing for higher intensity of residential development is supported. However a height limit of 22m is considered the more appropriate for consistency with the height limits proposed within this submission, and appropriate levels of enablement, along with the unnecessary need to differentiate between the heights of buildings depending on where they are located on the site.</p>	<p>Amend rule 15.10.2.1 as follows:</p> <p>Maximum building height</p> <ol style="list-style-type: none"> The maximum height of any building shall be 15 metres, <u>unless specified below.</u> <u>The maximum height of any Comprehensive Residential Development located within the Comprehensive Housing Precinct (shown on the</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>planning maps) shall be 21 22 metres, for buildings located adjacent to the street, or 12 metres for buildings located at the rear of the site.</p>
164.	Mixed Use Zone – Comprehensive Residential Development	<p>15.10.1.1(P27)</p> <p>15.10.1.3 (RD3 / RD4) Comprehensive Residential Development</p> <p>15.10.2.9 Minimum Standards for Comprehensive Residential Development.</p> <p>15.14.3.40 Assessment Matters Comprehensive Redevelopment</p> <p>15.10.1.5(NC3)</p> <p>Appendix 15.15.12 – Sydenham and Appendix 15.15.13. Appendix 15.15.14</p>	Oppose	<p>These provisions are overtly complicated, unworkable and provide inappropriate mechanisms to manage development and acquire public laneways (Appendix 15.15.12 – Sydenham and Appendix 15.15.13).</p> <p>Clarity needs to be improved in (P27) that those provisions apply to all MUZ except:</p> <ul style="list-style-type: none"> (i) Blenheim Road / Main South Road 15.10.1.4(D1); and (ii) Comprehensive Housing Precinct (15.10.1.3 (RD3) and (RD4). 	<p>Delete all existing provisions and provide a suite of workable and clear rules that encourage and enable large scale redevelopment.</p> <p>Remove statutory impediments in Appendix 15.15.12 – Sydenham and Appendix 15.15.13 requiring ‘Greenways’ and ‘Shared Pedestrian / Cycleways’ and seek to facilitate through more appropriate means – such as negotiated purchase.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Reference in 15.10.1.3(RD3) to 15.14.3.40(a)(iv) and (v) is incorrect, as these provisions do not exist.</p> <p>The respective matters identified in relation to 15.10.1.3(RD4) are overly excessive and broad.</p> <p>15.10.1.5(NC3) has the statutory function of deeming all Comprehensive Residential Development within the precinct identified for such (at Appendix 15.15.12 and 15.15.13) non-complying. This inconsistency and error needs to be corrected.</p> <p>The matters expressed in 15.14.3.40 are overly excessive and broad (effectively not restricting the matters to be assessed), lack certainty of achievement, and are absent a resource management purpose. Collectively these matters are the antithesis of the achievement of Objective 3.3.1</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>and Objective 3.3.2 and will disenable investment and redevelopment. Reference is sought to be made to a good quality living environment that positively contributes to local amenity as a high quality environment is contextually unobtainable in a transitioning Mixed Use Environment.</p> <p>The requirements in Appendix 15.15.12 – Sydenham and Appendix 15.15.13. Appendix 15.15.14 are not the most appropriate in terms of s32 of the Act, and will act to disenable redevelopment and the purpose of the Zone.</p>	
165.	Central City Zone	15.11.1.1(P18) – Small buildings	Support	Support the introduction of a permitted pathway for small buildings where the built form rules and activity standards are sufficient to deliver acceptable urban design outcomes and the need for a separate urban design assessment/ consent is able to be avoided.	Retain P18 as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
166.	Central City Zone	15.11.1.2(C1)	Oppose	<p>Additions to C1 are not in accordance with the statutory requirements of the NPS-UD, Sections 77G or 77H of the Resource Management Act, nor Objective 3.3.1 and 3.3.2 of the Plan. The provisions would act as proxies to otherwise reduce development capacity.</p> <p>The Operative Plan controlled activity status for urban design assessments is sought to be retained.</p>	Delete proposed PC14 amendments to the rule i.e. retain the Operative Plan provision.
167.	Central City Zone Central City Mixed Use Zone	Residential Activity 15.11.1.3(RD4) Matters (b) and (c) 15.12.1.3(RD)(b) and (c)	Oppose	<p>Additional controls are unnecessary and inappropriate. These matters are able to be addressed by existing matters (i.e 15.14.2.9(b) and 15.14.2.9(d).</p>	<p>Amend the rule by deleting clauses (b) and (c) as follows:</p> <p>a. Residential activity in the Commercial Central City Business City Centre and Central City Mixed Use Zones – Rule 15.134.2.9</p> <p>b. Glazing – 15.14.3.37</p> <p>c. Outlook spaces – 15.14.3.38.</p>
168.	Central City Zone	Buildings 15.11.1.3(RD5)	Oppose	<p>As a consequential amendment to the relief sought in this submission to delete various</p>	<p>Amend rule by deleting clauses (m) and (n) as follows:</p> <p>m. Upper floor setbacks, tower</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought			
				built form rules, the activity status rule also needs amending to remove reference to rule breaches with the built form rules on wind, upper floor setbacks and tower dimension.	dimension and site coverage – Rule 15.14.3.35 n. Wind – Rule 15.14.3.39			
169.	Central City Zone	Sunlight and Outlook for the street 15.11.2.3	Oppose	Acts as a proxy to limit development capacity in the Central City in a manner that is not founded in the NPS-UD Policy 3.	Delete rule			
170.	Central City Zone	Building Height – 15.11.2.11	Support in part	<p>There is an inconsistency between the definition of Building Base and the rule. The definition of Building Base is sought to be deleted, as it is internally inconsistent with provisions in the Plan and is uncertain in purpose.</p> <p>Building Base is defined as: <i>‘In respect to the City Centre and Central City Mixed Use Zones, means any part of any building that is below the maximum permitted height for that type of building in the zone’.</i></p>	<p>1. Amend definition of Building Base as:</p> <p>Building Base: In respect to the City Centre and Central City Mixed Use Zones, means any part of any building that is below the maximum permitted height for that type of building in the zone.</p> <p>2. Amend rule as follows:</p> <table><tr><td></td><td>Applicable to</td><td>Standard</td></tr></table>		Applicable to	Standard
	Applicable to	Standard						

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought									
					<table><tr><td>i.</td><td>All buildings, except as provided for in ii, and iii and iv below.</td><td>A. The maximum height shall be <u>90 metres</u>. B. The maximum height of the building base shall be 28 metres. in accordance with the Central City Maximum Building Height planning map</td></tr><tr><td>ii.</td><td>All buildings in the <u>heritage setting of New Regent Street as identified in Appendix 9.3.7.2.</u></td><td>The minimum and maximum height shall be 8 metres.</td></tr><tr><td>iii.</td><td>All buildings at the Arts Centre, being land bordered by Montreal Street,</td><td>The maximum height shall be 16 metres.</td></tr></table>	i.	All buildings, except as provided for in ii, and iii and iv below.	A. The maximum height shall be <u>90 metres</u> . B. The maximum height of the building base shall be 28 metres. in accordance with the Central City Maximum Building Height planning map	ii.	All buildings in the <u>heritage setting of New Regent Street as identified in Appendix 9.3.7.2.</u>	The minimum and maximum height shall be 8 metres.	iii.	All buildings at the Arts Centre, being land bordered by Montreal Street,	The maximum height shall be 16 metres.
i.	All buildings, except as provided for in ii, and iii and iv below.	A. The maximum height shall be <u>90 metres</u> . B. The maximum height of the building base shall be 28 metres. in accordance with the Central City Maximum Building Height planning map												
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					<table><tr><td></td><td>Worcester Street, Rolleston Avenue and Hereford Street.</td><td></td></tr><tr><td><u>iv</u></td><td><u>All buildings within the Cathedral Square Height Precinct</u></td><td>A. The maximum height shall be 45 metres: B. The maximum height of the building base shall be 28 metres.</td></tr><tr><td><u>v.</u></td><td><u>All buildings within the Victoria Street Height Precinct</u></td><td>A. The maximum height shall be 45 metres. B. The maximum height of the building base shall be 28 metres.</td></tr></table>		Worcester Street, Rolleston Avenue and Hereford Street.		<u>iv</u>	<u>All buildings within the Cathedral Square Height Precinct</u>	A. The maximum height shall be 45 metres: B. The maximum height of the building base shall be 28 metres.	<u>v.</u>	<u>All buildings within the Victoria Street Height Precinct</u>	A. The maximum height shall be 45 metres. B. The maximum height of the building base shall be 28 metres.
	Worcester Street, Rolleston Avenue and Hereford Street.													
<u>iv</u>	<u>All buildings within the Cathedral Square Height Precinct</u>	A. The maximum height shall be 45 metres: B. The maximum height of the building base shall be 28 metres.												
<u>v.</u>	<u>All buildings within the Victoria Street Height Precinct</u>	A. The maximum height shall be 45 metres. B. The maximum height of the building base shall be 28 metres.												

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<div> <div>vi. <u>All buildings in the Central City Heritage Qualifying Matter and Precinct, including the following areas:</u></div> <div>...</div> <div>The maximum height shall be 28 metres.</div> </div>
171.	Central City Zone	<p>Maximum Road Wall Height - 15.11.2.12</p> <p>Building Tower Setbacks - 15.11.2.14</p> <p>Maximum building tower dimension and building tower coverage – 15.11.2.15</p> <p>15.11.2.16 Minimum building tower separation</p> <p>15.11.2.17 Wind</p>	Oppose	<p>These provisions, both individually and collectively act as proxies to restrict height and associated development capacity in the Central City Zone.</p> <p>The retention (and addition) of height rules in the City Centre zone simply does not give effect to the NPS-UD Policy 3 direction to “enable in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification.</p>	Delete all these provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>The proposed wind standards are inappropriate (as set between 4m/s to 6m/s more than 5% annually at ground level within 100m of a proposal.) The Technical data used in support of the provision identifies that measured wind levels already typically exceed these levels without development. There is no supporting s32 considering the benefits and costs associated with this provision.</p> <p><i>“Christchurch is a relatively windy city with a background mean wind speed of about 4 m/s (at 10 m above the ground). At the airport for example, the mean wind speed exceeds 4 m/s about 45% of the time, exceeds 6 m/s about 21% of time, and exceeds 8 m/s about 11% of the time”.¹</i></p>	
172.	Central City Mixed Use Zone	15.12.1.1(P16)(a)(iii)	Oppose	Delete as this matter is appropriately managed through	Amend rule by deleting clause (a)(iii).

¹ Technical Advice for Wind Assessments for Christchurch Cit. Meteorology Solutions (2022). [Section 2. Context]

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				screening and controls in Rule 15.12.2.5 'Screening'	
173.	Central City Mixed Use Zone	15.12.1.1(P16)(c)(iii)	Oppose	Requirement is seen as excessive within this context as these areas are not necessarily mutually exclusive.	Amend rule by deleting clause (c)(iii).
174.	Central City Mixed Use Zone	15.12.1.1(P16)(j)	Oppose	This requirement is seen as excessive within this context as a higher density of residential activity should be encouraged, with standards for outdoor and communal living space being used to provide appropriate levels of amenity.	Amend rule by deleting clause (j).
175.	Central City Mixed Use Zone	15.12.1.3(RD2) – Buildings	Oppose	Additional matters of discretion associated with Upper Floor Setbacks, and Glazing are unnecessary and not the more appropriate provisions.	Amend rule by deleting clauses (k) upper floor setbacks and (l) glazing.
176.	Central City Mixed Use Zone	15.12.1.3(RD4) – Four or more residential units	Oppose	Matters of discretion associated with Upper Floor Setbacks, and Glazing are unnecessary and not the more appropriate provisions. The matters in 15.5.1 are considered	Amend rule by deleting clauses (b) outdoor living space and (c) glazing.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				appropriately broad to ensure an appropriate balance between private, communal and public amenity.	
177.	Central City Mixed Use Zone	15.12.2.1 'Street scene, landscaping and trees'	Oppose	The proposed landscaping requirements are excessive and inappropriately reduce development opportunities. The operative plan rule is sought to be retained and PC14 amendments deleted.	Delete PC14 amendments and retain operative plan rule.
178.	Central City Mixed Use Zone	15.12.2.2	Support in part	<p>The maximum height of 32m is supported as being appropriately enabling within a proximate distance to the City Centre Zone.</p> <p>The restrictions associated with the rule are opposed as being unnecessary, in conjunction with the absence of clarity in the definition associated with 'building base' as discussed in this submission.</p>	<p>Amend the rule as follows:</p> <p>15.12.2.2 Maximum building height</p> <p>a. The maximum height of any building shall be in accordance with the height specified Unless identified on the Central City Maximum Building Height planning map <u>the maximum height of any building shall be 32 metres.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>b. The maximum height of any building base shall be 17 metres.</p> <p>b. Any application arising from this rule shall not be limited or publicly notified.</p>
179.	Central City Mixed Use Zone	15.12.2.7 – Minimum setback from the boundary	Oppose	It is considered that the inserted requirements are unnecessary, and unduly constraining.	Delete PC14 amendments and retain operative plan rule.
180.	Central City Mixed Use Zone	15.12.2.9 – Minimum number of floors	Oppose	Whilst a minimum requirement of two floor levels is appropriate in the zone to increase intensity of development, the zone provides for a wide variety of uses, not all of which are appropriate in multi-storey buildings. As such single storey buildings may well be appropriate in a mixed use environment.	Delete proposed rule.
181.	Central City Mixed Use Zone	15.12.2.10 – Building Setbacks	Oppose	Requirements associated with internal setbacks between building towers is unnecessary.	Amend the rule by deleting clauses (b) and (c).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
182.	Central City Mixed Use Zone	15.12.2.11 – Building Tower Coverage	Oppose	Considered unnecessary and would inappropriate disenable development capacity for no sound resource management purpose.	Delete the rule.
183.	Central City Mixed Use Zone	15.12.2.12 – Glazing	Oppose	Considered unnecessary and would inappropriate disenable development capacity for no sound resource management purpose	Delete the rule.
184.	Central City Mixed Use Zone (South Frame)	15.12.1.1(P13)(a)(iii)	Oppose	Delete as this matter is appropriately managed through screening and controls in Rule 15.12.2.5 'Screening'	Amend the rule by deleting clause (a)(iii).
185.	Central City Mixed Use Zone (South Frame)	15.12.1.1(P13)(d)(iii)	Oppose	Requirement is seen as excessive within this context as these areas are not necessarily mutually exclusive.	Amend the rule by deleting clause (d)(iii).
	Central City Mixed Use Zone (South Frame)	15.12.1.1(P13)(f)(g)(j)	Oppose	Increasing the extent of setbacks is not more appropriate within this context, revert to the operative Plan rule.	<ol style="list-style-type: none"> 1. Amend the rule by retaining the operative Plan wording for clause (f). 2. Delete clauses (g) and (j).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Clause (j) is seen as excessive within this context as a higher density of residential activity should be encouraged, with standards for outdoor and communal living space being used.	
186.	Central City Mixed Use Zone – South Frame	15.13.1.3(RD4)	Oppose	Assessment matters for Glazing and Outdoor Space are excessive and appropriate matters are contained within Provision 15.14.2.10.	Amend the rule by deleting clauses (b) – glazing and (c) – outlook.
187.	Central City Mixed Use Zone – South Frame	15.13.1.3(RD5)	Oppose	Assessment matters for Upper floor setbacks and glazing are excessive.	Amend the rule by deleting clauses (l) – upper floor setbacks and (m) – glazing.
188.	Central City Mixed Use Zone – South Frame	15.13.2.1	Support in part	<p>The maximum height of 32m is supported as being appropriately enabling within a proximate distance to the City Centre Zone.</p> <p>The restrictions associated with is opposed as unnecessary, in conjunction with the absence of clarity in the definition associated with ‘building base’</p>	<p>Delete the rule and replace as follows:</p> <p><u>The maximum height of all buildings shall be 32m.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				as discussed in this submission. The provision as associated with notification is sought to be consistent with that associated with the Central City – Mixed Use zone.	Retain clause (b).
189.	Central City Mixed Use Zone – South Frame	15.13.2.4(f) 'Street scene, landscaping and trees'	Oppose	The requirement for a minimum area of tree canopy of 4m ² is excessive and inappropriately, it reduces development opportunities.	Amend the rule by deleting the PC14 amendments and retaining the Operative Plan rule wording.
190.	Central City Mixed Use Zone – South Frame	15.13.2.10 – Building Tower Setbacks 15.13.2.11 – Building Tower Coverage 15.13.2.12 – Glazing	Oppose	Considered unnecessary and would reduce development capacity for no sound resource management purpose.	Delete rules 15.13.2.10 – tower setbacks, 15.13.2.11 – tower coverage, and 15.13.2.12 -glazing.
191.	Assessment Matters	15.14.3.1	Oppose	Additional assessment matters set out in clause (b) are unnecessary as the key issues are already addressed in clause (a), or are matters to be deleted	Delete clause (b), with the exception of clause (v) (subject to the below amendment): v. <u>The individual or cumulative</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				as a consequential amendment in association with the submission seeking the deletion of street wall, wind, and tower rules.	<u>effects of shading, visual bulk and dominance, and reflected heat from glass on sites in adjoining residential zones or on the character, quality and use of public open space and in particular the Ōtākaro Avon River corridor, Earthquake Memorial, Victoria Square and Cathedral Square;</u>
192.	Assessment Matters	15.14.3.35 – Upper Floor Setbacks 15.14.3.36 – height in Central City Mixed Use Zone 15.14.3.37 Glazing 15.14.3.38 Outdoor Spaces 15.14.3.39 Wind 15.14.3.40 – Comprehensive Residential Development in the Mixed Use Zones 15.14.5.3 City Spine Transport Corridor	Oppose	Additional controls are unnecessary, subjective and overly broad. These matters are all addressed by Rule 15.14.2.6 'Urban Design'. Deletion of the assessment matters sought as a consequential amendment associated with the submission seeking the deletion of the upper floor setback rule.	Delete the following assessment matters: 15.14.3.35 – upper floor setbacks 15.14.3.36 – height in Central City Mixed Use Zone 15.14.3.37 Glazing 15.14.3.38 Outdoor Spaces 15.14.3.39 Wind 15.14.3.40 – Comprehensive Residential Development in the Mixed Use Zones 15.14.5.3 City Spine Transport Corridor

Appendix 2: Metropolitan Centre Zone Rules

The following Metropolitan Centre Zone Rules set out proposed amendments sought from Kāinga Ora to Plan Change 14, to incorporate rules to enable the classification of Hornby, Papanui and Riccarton as Metropolitan Centre Zones

Proposed changes in zoning are highlighted in dark blue.

MCZ - Metropolitan Centre Zone

The Christchurch Metropolitan Centres are commercial centres with a focal point as sub-regional centres of Papanui, Riccarton and Hornby. They have a planned urban built environment that reflects a high density built form with high-quality public spaces. The Metropolitan Centre Zone provides for a diverse range of commercial, retail, community and recreational activities and offers a variety of employment and living opportunities.

The Metropolitan Centre Zone implements the National Policy Statement on Urban Development, by enabling a built form and density that reflects demand for housing and business use in sub-regional centres.

Activities and buildings along identified active street frontages interact with the streets and public spaces and contribute to a vibrant and attractive metropolitan centre. New buildings and development are well designed and reflect the high-quality urban environment.

Objectives
<p>MCZ-O1 Purpose of the Metropolitan Centre Zone</p> <p>The Metropolitan Centre Zone:</p> <ol style="list-style-type: none"> 1. Is Christchurch's secondary commercial, civic and community centres; and 2. Accommodates a wide range of commercial, community, recreational and residential activities.
<p>MCZ-O2 Planned urban built environment of the Metropolitan Centre Zone</p> <p>The planned urban built environment of the Metropolitan Centre Zone is characterised by:</p> <ol style="list-style-type: none"> 1. A built form that is compact and reflects the high-density environment of the Metropolitan Centre; 2. A built environment that is versatile, well designed and of high quality and contributes to attractive and safe public spaces; and 3. An urban environment that is an attractive place to live, work and visit.
Policies
<p>MCZ-P1 Appropriate activities</p> <p>Enable activities that are compatible with the purpose of the Metropolitan Centre Zone.</p>
<p>MCZ-P2 Location of residential activity</p> <p>Enable residential activity where:</p> <ol style="list-style-type: none"> 1. It is located above ground floor; and 2. It provides for an ongoing active street frontage with a positive interface with the public space.
<p>MCZ-P3 Health and well-being for residential activity</p> <p>Ensure residential activity and residential units achieve a healthy urban built environment that provides for people's amenity and well-being in respect of:</p> <ol style="list-style-type: none"> 1. Access to sunlight, daylight and outdoor living space; and 2. Privacy and site design.

<p>MCZ-P4 Other activities</p> <p>Provide for other activities within the Metropolitan Centre Zone where:</p> <ol style="list-style-type: none"> 1. Any significant adverse effects, can be avoided, remedied or mitigated; and 2. The activity is consistent with the planned urban built environment and purpose of the zone.
<p>MCZ-P5 Inappropriate activities</p> <p>Avoid activities that are incompatible with the purpose of the Metropolitan Centre Zone.</p>
<p>MCZ-P6 Small scale built development</p> <p>Enable repairs, alterations and additions to existing buildings and structures, and the erection of smaller-scale buildings and structures, that achieve the planned urban built environment for the Metropolitan Centre Zone.</p>
<p>MCZ-P7 Larger scale built development</p> <p>Provide for high-density development that achieves a quality built form, taking into consideration the following design objectives and the planned urban built environment of the zone.</p> <ol style="list-style-type: none"> 1. Buildings are well-designed and contribute to a high-quality vibrant public realm through visual interest and aesthetic coherence achieved through façade design, materials, and active edges; 2. Buildings abut the street edge and define and enclose the streets, and define the edges of open space; 3. Street corners are legible and enhanced through architectural treatment and form and maximised activity; 4. Pedestrian amenity is maximised through good permeability and activation, which contributes to safety and walkability; 5. Servicing and parking are subservient to the built form to maximise an attractive and active pedestrian interface at the street edge; 6. Servicing plant is integrated within the architectural design, to avoid an 'add on' appearance and ensure a well-designed top to buildings; 7. Residential activity is provided with a high quality living environment, including access to privacy, outlook, and sun access; 8. Development responds to the positive contextual elements (existing and potential) including neighbouring buildings, elements such as trees and crossing points in the street
<p>MCZ-P8 Public space interface</p> <p>Where located along an active street frontage identified on the planning maps, require development to provide a positive interface with the public space through:</p> <ol style="list-style-type: none"> 1. Buildings that are built up to the front boundary of the site; 2. Continuous active street frontages; 3. Verandas or other forms of pedestrian shelter; 4. Transparent glazing on the ground floor that allows visibility into and out of commercial frontages and reflects whether it is a primary or secondary frontage; 5. Obvious and highlighted public entrances; and 6. Visually unobtrusive parking, storage and servicing areas, preferably within or to the rear of the building.
<p>MCZ-P9 Car parking and parking lots</p> <p>Only allow for ground level car parking and parking lots where:</p> <ol style="list-style-type: none"> 1. It is not located along a primary frontage identified on the planning maps; and

2. Any adverse effects on the amenity and quality of the streetscape and public open spaces can be minimised.

Rules
<p>MCZ-R1 New buildings and structures, and alterations, repairs and additions to existing buildings and structures</p> <p>1. Activity status: Permitted</p> <p>Where:</p> <ul style="list-style-type: none"> a. The gross floor area of the new building, structure or addition to an existing building or structure is no more than 450m²; and b. Compliance is achieved with: <ul style="list-style-type: none"> i. MCZ-S1; ii. MCZ-S2; iii. MCZ-S4; and iv. MCZ-S5. <p>Except that: MCZ-S1, MCZ-S4 and MCZ-S5 do not apply to alterations and repairs to existing buildings and structures.</p>
<p>2. Activity status: Restricted discretionary</p> <p>Where:</p> <ul style="list-style-type: none"> a. Compliance is not achieved with MCZ-R1-1.a. <p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> 1. The matters in MCZ-P7. <p>Notification:</p> <p>An application under this rule is precluded from being publicly and limited notified in accordance with sections 95A and 95B of the RMA.</p>
<p>3. Activity status: Restricted discretionary</p> <p>Where:</p> <ul style="list-style-type: none"> a. Compliance is not achieved with MCZ-R1-1.b. <p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> 1. The matters of discretion of the infringed standard. <p>Notification:</p> <p>An application under this rule where compliance is not achieved with MCZ-S2, MCZ-S3, MCZ-S4, or MCZ-S5 is precluded from being publicly</p>

	notified in accordance with section 95A of the RMA.
MCZ-R2	Construction activity 1. Activity status: Permitted
MCZ-R3	Retail activity 1. Activity status: Permitted
MCZ-R4	Commercial service activity 1. Activity status: Permitted
MCZ-R5	Office 1. Activity status: Permitted
MCZ-R6	Entertainment activity 1. Activity status: Permitted
MCZ-R7	Recreation activity 1. Activity status: Permitted
MCZ-R8	Gymnasium 1. Activity status: Permitted
MCZ-R9	Food and beverage outlet 1. Activity status: Permitted
MCZ-R10	Healthcare activity 1. Activity status: Permitted
MCZ-R11	Educational facility 1. Activity status: Permitted
MCZ-R12	Community facility 1. Activity status: Permitted
MCZ-R13	Visitor accommodation 1. Activity status: Permitted
MCZ-R14	Residential activity including Papakāinga/Kāinga Nohoanga 1. Activity status: Permitted Where: a. Compliance is achieved with: i. MCZ-S3.
	2. Activity status: Restricted discretionary

	<p>Where:</p> <p>a. Compliance is not achieved with MCZ-S3.</p> <p>Matters of discretion are restricted to</p> <p>1. The matters of discretion of the infringed standard.</p> <p>Notification:</p> <p>An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</p>
	<p>MCZ-R15 Social Housing Complex</p> <p>1. Activity status: Permitted</p>
	<p>MCZ-R16 Community corrections activities</p> <p>1. Activity status: Permitted</p>
	<p>MCZ-R17 Conservation activity</p> <p>1. Activity status: Permitted</p>
	<p>MCZ-R18 Customary harvesting</p> <p>1. Activity status: Permitted</p>
	<p>MCZ-R19 Large format retail activity</p> <p>1. Activity status: Permitted</p>
	<p>MCZ-R20 Supermarket</p> <p>1. Activity status: Permitted</p>
	<p>MCZ-R21 Emergency service facility</p> <p>1. Activity status: Restricted discretionary</p> <p>Matters of discretion are restricted to:</p> <p>1. The matters in MCZ-P4.</p> <p>Notification:</p> <p>An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</p>
	<p>MCZ-R22 Retirement village</p> <p>1. Activity status: Restricted discretionary</p> <p>Matters of discretion are restricted to:</p> <p>1. The matters in MCZ-P4.</p>
	<p>MCZ-R23 Parking lot</p> <p>1. Activity status: Restricted discretionary</p>

	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. The matters in MCZ-P9. <p>Notification: An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA</p>
	<p>MCZ-R24 Trade supplier</p> <ol style="list-style-type: none"> 1. Activity status: Discretionary
	<p>MCZ-R25 Drive-through services</p> <ol style="list-style-type: none"> 1. Activity status: Permitted
	<p>MCZ-R26 Any activity not otherwise listed as permitted, restricted discretionary, discretionary or non-complying</p> <ol style="list-style-type: none"> 1. Activity status: Discretionary
	<p>MCZ-R27 Industrial activity</p> <ol style="list-style-type: none"> 1. Activity status: Non-complying
	<p>MCZ-R28 Primary production</p> <ol style="list-style-type: none"> 1. Activity status: Non-complying
	<p>MCZ-R29 Rural activities other than primary production</p> <ol style="list-style-type: none"> 1. Activity status: Non-complying

Standards	
MCZ-S1 Height	
<ol style="list-style-type: none"> 1. All buildings and structures must not exceed a maximum height above ground level of 53m. 	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. The location, design and appearance of the building or structure; 2. Loss of sunlight to adjacent public space; 3. Shading to surrounding buildings; 4. Shading and loss of privacy for any adjacent residential activity; 5. Wind effects on the safety and amenity of the adjacent public space; 6. The planned urban built environment; and 7. Whether an increase in building height results from a response to natural hazard mitigation.
MCZ-S2 Active street frontages	
<ol style="list-style-type: none"> 1. Along building lines identified on the planning maps all buildings must be built up to and oriented towards the identified building line and provide a veranda that: 	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. Whether the building promotes a positive interface with the street, community safety and visual interest; 2. Whether the building incorporates landscaping or other means to provide

<ul style="list-style-type: none"> a. Extends along the entire length of the building frontage; b. Provides continuous shelter with any adjoining veranda; and c. Has a minimum setback of 500mm from any kerb face. <p>2. For sites with primary street frontage controls identified in the planning maps:</p> <ul style="list-style-type: none"> a. At least 55% of the ground floor building frontage must be display windows or transparent glazing; and b. The principal public entrance to the building must be located on the front boundary. <p>3. For sites with secondary street frontage controls identified in the planning maps at least 35% of the ground floor building frontage must be display windows or transparent glazing.</p>	<p>increased amenity, shade and weather protection; and</p> <p>3. Whether topographical or other site constraints make compliance with the standard impractical.</p>
MCZ-S3 Location of residential units	
<p>1. All residential units must be located above ground floor.</p>	<p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> 1. The amenity and quality of the streetscape; 2. Whether the location of the residential units promote on the an active frontage, community safety and visual interest at the pedestrian level; and 3. Whether the design could facilitate conversion to commercial use so as not to foreclose future options.
MCZ-S4 Location of parking	
<p>1. Any on-site ground level car parking must be located within or at the rear of the building that it serves.</p>	<p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> 1. The amenity and quality of the streetscape.

MCZ-S5 Service areas and outdoor storage	
<p>1. Any on-site service area, including rubbish collection areas, and area for the outdoor storage of goods or materials must:</p> <ul style="list-style-type: none"> a. Be located to the rear of the building; and b. Without preventing the provision of a gate or entry point to the site, be fully screened by a 1.8m high fence or landscaping where it is visible from the road or any other public space. 	<p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> 1. The amenity and quality of the streetscape or public space; and 2. The service and storage needs of the activity.

Appendix 3: Maps

The following maps set out the height amendments sought from Kāinga Ora to Plan Change 14.

Noting that changes to the Residential Suburban and Residential Transition Zone and including the Lyttleton Port Residential Zone has not been shown here.

834

Christchurch City Council

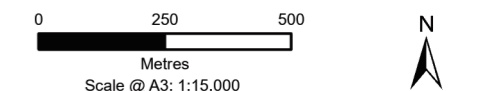
Plan Change 14

Kāinga Ora Submission

Riccarton

- Kāinga Ora Proposed HVC
- Height Variation Control - 36m
- Kāinga Ora Proposed Zoning
- Metropolitan Centre Zone
- High density residential zone
- Medium density residential zone
- PC14 Zoning
- Central City Mixed Use Zone
- High density residential zone
- Large format retail zone
- Local centre zone
- Medium density residential zone
- Mixed use zone
- Neighbourhood centre zone
- Town centre zone
- Transport
- Specific Purpose
- Industrial General
- Industrial Heavy
- Residential Guest Accommodation
- Residential Medium Density
- Residential Suburban
- Residential Suburban Density Transition
- Open Space Community Parks
- Open Space Metropolitan Facilities
- Open Space Natural
- Open Space Water and Margins
- Commercial Office

This map contains data derived in part or wholly from sources other than Kāinga Ora, and therefore, no representations or warranties are made by Kāinga Ora as to the accuracy or completeness of this information. Contains information sourced from Hastings District Council, Hawkes Bay Regional Council, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS. Map intended for distribution as an A3 PDF document.



Revision	1.0
Status	FINAL
Author	JH
Verifier	LB
Date	12/05/2023

Project	Christchurch City Council PC14 Submissions
Client	Kāinga Ora
Discipline	GIS
Drawing No.	GIS-7774461-CCPC14-01



834

Christchurch City Council

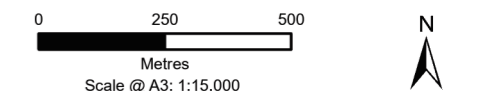
Plan Change 14

Kāinga Ora Submission

Hornby

- Kāinga Ora Proposed HVC
- Height Variation Control - 36m
- Kāinga Ora Proposed Zoning
- Metropolitan Centre Zone
- High density residential zone
- Medium density residential zone
- PC14 Zoning
- Future Urban Zone
- High density residential zone
- Large format retail zone
- Local centre zone
- Medium density residential zone
- Mixed use zone
- Neighbourhood centre zone
- Town centre zone
- Transport
- Specific Purpose
- Industrial General
- Industrial Heavy
- Industrial Park
- Rural Quarry
- Rural Quarry or Open Space Community Parks (Templeton)
- Rural Urban Fringe
- Residential Guest Accommodation
- Residential Suburban
- Residential Suburban Density Transition
- Open Space Community Parks
- Open Space Metropolitan Facilities
- Open Space Water and Margins
- Residential New Neighbourhood
- Precinct
- Brownfield Precinct

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Verifier	LB
Date	12/05/2023

Project	Christchurch City Council PC14 Submissions
Client	Kāinga Ora
Discipline	GIS
Drawing No.	GIS-7774461-CCPC14-04





12th May 2023

Attn: Mark Stevenson
Planning Manager
Christchurch City Council
Po Box 73016
Christchurch

Submission lodged via email: engagement@ccc.govt.nz

**KĀINGA ORA – HOMES AND COMMUNITIES SUBMISSION ON A NOTIFIED
PROPOSAL FOR PLAN CHANGE 14 UNDER CLAUSE 6 OF SCHEDULE 1 OF THE
RESOURCE MANAGEMENT ACT 1991**

This is a submission on Plan Change 14 – Housing and Business Choice (“PC14”) from Christchurch City Council (“the Council” on the Operative Christchurch District Plan (“the Plan”).

Kāinga Ora does not consider it can gain an advantage in trade competition through this submission. In any event, Kāinga Ora is directly affected by an effect of the subject matter of the submission that:

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

The specific provisions of the proposal that this submission relates to:

PC14 in its entirety.

This document and the appendices attached is Kāinga Ora submission on PC14.

The Kāinga Ora submission is:

1. Kāinga Ora Homes and Communities (“Kāinga Ora”) is a Crown Entity and is required to give effect to Government policies. Kāinga Ora has a statutory objective that requires it to contribute to sustainable, inclusive, and thriving communities that:
 - a) Provide people with good quality, affordable housing choices that meet diverse needs; and
 - b) Support good access to jobs, amenities and services; and
 - c) Otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
2. Because of these statutory objectives, Kāinga Ora has interests beyond its role as a public housing provider. This includes a role as a landowner and developer of residential housing and as an enabler of quality urban developments through increasing the availability of build-ready land across the Canterbury Region, including Christchurch City.
3. Kāinga Ora therefore has an interest in both PC13 and PC14 and how they:
 - a) Gives effect to the National Policy Statement on Urban Development (“**NPS-UD**”) and The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (“**the Housing Supply Act**”);
 - b) Minimises barriers that constrain the ability to deliver housing development across public housing, affordable housing, affordable rental, and market housing; and
 - c) Provides for the provision of services and infrastructure and how this may impact on the existing and planned communities, including Kāinga Ora housing developments.
4. Kāinga Ora supports the general direction and intent of Plan Change 14, especially to the extent that this suite of plan changes is more enabling of residential and business development capacity compared to the Christchurch City Council Operative District Plan.

In particular, Kāinga Ora supports:

- a) The recognition of the need for well-functioning urban environments (consistent with the direction set out in the National Policy Statement on Urban Development 2020 (“**NPS-UD**”);
- b) The provision of medium density housing in most existing residential areas across the city, which is consistent with the requirements of the Resource Management (Enabling Housing Supply) Amendment Act 2021 (“**the Amendment Act**”);
- c) The recognition of the need to provide sufficient development capacity to meet long term demands for housing and business land;
- d) The need to manage significant risks from natural hazards;
- e) The promotion of a compact urban form and residential intensification in Christchurch City;
- f) The provision for enabling medium to high density residential development within a walkable catchment of the City Centre and larger Commercial Centres; and
- g) The provision of a range of commercial and mixed-use environments which will provide for and support urban development across Christchurch City.

5. The Kāinga Ora submission seeks amendments to PC14 in the following topic areas:

Qualifying Matters

- a) Kāinga Ora could support the qualifying matters, subject to amendments and clarifications as sought in the submission with the exception of: Low Public Transport Accessibility, Key Transport Corridors, Sunlight Access, Residential Heritage Areas, Character Areas, the Christchurch International Airport Noise Influence Area, Industrial Interfaces, and Open Space Areas which are opposed in full by Kāinga Ora for the reasons included in **Appendix 1**.
- b) Kāinga Ora considers that qualifying matters need to be expressed more clearly across PC13 and PC14 to assist with plan administration and interpretation. For example, having some of the Heritage Area provisions being contained in PC14 and following an IPI process i.e. the built form standards. Whilst other Heritage Area provisions are being progressed through a separate PC13, and following a first schedule process i.e. Heritage Area policies has created efficiency issues.

- c) Kāinga Ora opposes the proposed introduction of certain new qualifying matters through the IPI process because doing so in this instance (having regard to the nature of the particular qualifying matters concerned) goes beyond the scope of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. The concerns about the use of the IPI process for this purpose was highlighted in the recent Environment Court's decision of *Waikanae Land Company Limited v Heritage New Zealand Pouhere Tāonga [2023] NZEnvC 056*. As noted in that case, if a Council wishes to implement other changes to its district plan, then there is the usual First Schedule process that can be adopted, with that process containing the appropriate safeguard of a full appeal to the Environment Court.

Residential Heights

- d) Kāinga Ora supports the application of a Medium Density Residential Zone (MRZ) across all relevant residential zones. It also supports the introduction of High Density Residential Zone (HRZ) around the edge of the City Centre and where located in close proximity to larger commercial centres. The extent of HRZ is sought to be increased in the Riccarton area given the scale of the Riccarton commercial centre and proximity to the University of Canterbury activity hub. In addition to the increased spatial extent of HRZ being sought, Kāinga Ora submits that the heights and centre hierarchy be simplified, with greater enablement of taller buildings provided.
- e) Further to this, Kāinga Ora seeks that a Height Variation Control overlay of 36m be applied 1.20km from the edge of the City Centre Zone and the three Metropolitan Centre Zones as sought below.

Metropolitan Centre Zoning

- f) Kāinga Ora seeks the introduction of a new 'Metropolitan Centre Zone (MCZ) in the Plan to replace the Riccarton, Papanui, and Hornby Town Centre Zones to recognise the broader catchment these centre serve, both currently and to account for future growth of the residential catchment. The existing size, scale and function of these centres are such that they merit the application of a MCZ classification, with appropriate objectives, policies and rules framework. A MCZ chapter is sought and is attached in **Appendix 2**. Further, recent and proposed investment in public and active transport modes along the corridors in which these activity centres are located, support the case for a zoning classification reflective of their relative position within the centres hierarchy.

Industrial Interface, Industrial General, and Commercial Mixed Use proposals

- g) Kāinga Ora submits that the Industrial Interfaces qualifying matter and associated policies, and rules are deleted, and that the purported effects are managed, where necessary through noise controls and acoustic and ventilation requirements as opposed to the proposed density controls.
- h) In reviewing the locations that the Industrial Interface qualifying matter applies in the preparation of this submission, Kāinga Ora notes that the current function of many industrial general zone areas, that are located in primarily residential areas, would no longer meet a definition of 'industrial activity'. Kāinga Ora question if this zoning may no longer be appropriate for these locations and if an application of a commercial mixed use zone may be more appropriate; as has been proposed in PC14 for Sydenham.
- i) Similarly, in relation to the rules that have been proposed in commercial mixed use zone boundary changes in areas adjacent to the central city i.e. Sydenham and Phillipstown, Kāinga Ora express concern that the approach taken will not achieve the outcomes sought. Kāinga Ora proposes that the existing zoning remains and a schedule 1 process is followed, including structure planning and use of appropriate planning methods. This may also provide the Council with opportunities to support these changes through the Long Term Plan.

General Feedback

- j) Kāinga Ora submits that changes to policies, rules and matters of discretion are necessary to better reflect the requirements and intent of the 'the Housing Supply Act' and NPS-UD. Kāinga Ora considers that PC14 is not currently appropriately framed to recognise that as the character of planned urban areas evolves to deliver a more intensive and compact urban form, amenity values will change. Amendments are sought to ensure this is reflected more consistently throughout the provisions, in language that is consistent with the NPS-UD.
- k) The Kāinga Ora submission seeks changes to rules to address errors, to align with Schedule 3A of the Housing Supply Act, or to reduce duplication where the standards introduced via Schedule 3A overlap with District Plan provisions that are not proposed to be deleted.

- l) The Kāinga Ora submission seeks amendments to objectives, policies, rules and matters for discretion / assessment criteria - for improved clarity, effectiveness and focus on the specific resource management issue / effect to be addressed. Further, The scope and extent of assessment matters provide such broad discretion that they undermine the 'Housing Supply Act's' intent of a restricted discretionary activity status.
 - m) The submission seeks such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission above and in **Appendix 1**.
6. The changes requested are made to:
- a) Ensure that Kāinga Ora can carry out its statutory obligations;
 - b) Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991;
 - c) Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development;
 - d) Provide clarity for all plan users; and
 - e) Allow Kāinga Ora to fulfil its urban development functions as required under the Kāinga Ora–Homes and Communities Act 2019.
7. The Kāinga Ora submission points and changes sought can be found within Table 1 of Appendix 1 which forms the bulk of the submission.
8. A Metropolitan Centre Zone chapter is sought and included in **Appendix 2**.
9. Mapping changes sought are included in **Appendix 3**.

Kāinga Ora seeks the following decision from Christchurch City Council:

That the specific amendments, additions or retentions which are sought as specifically outlined in this letter and **Appendix 1-3**, are accepted and adopted into PC14, including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Kāinga Ora wishes to be heard in support of their submission.

Kāinga Ora seeks to work collaboratively with the Council and wishes to discuss its

submission on PC14 to address the matters raised in its submission.

A handwritten signature in black ink, appearing to be 'BL', written over a horizontal dotted line.

Brendon Liggett

Development Planning Manager

Kāinga Ora – Homes and Communities

ADDRESS FOR SERVICE: *Kāinga Ora – Homes and Communities, PO Box 74598, Greenlane, Auckland 1051. Email: developmentplanning@kaingaora.govt.nz*

Appendix 1: Decisions sought on PC14

The following table sets out the amendments sought to the PC14 and also identifies those provisions that Kāinga Ora supports.

Proposed changes are shown as ~~strikethrough~~ for deletion and underlined for proposed additional text.

Table 1

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
Zone Boundaries/ Mapping					
1.		Planning maps	Support in Part	<p>Kāinga Ora support the implementation of a Medium Density Residential Zone (MRZ) over all relevant residential zones. As set out in this submission, Kāinga Ora oppose the Public Transport Accessibility Qualifying Matter (QM) and the Airport Noise Influence Area QM and therefore seek as a consequence of deleting these QMs that the RS and RSDT zoned areas within these QMs be rezoned to MRZ.</p> <p>Kāinga Ora note some ambiguity in the provisions as to whether the land that is subject to the Tsunami Risk QM is intended to be zoned MRZ or RS/ RSDT. Whilst agreeing that a high risk of natural hazards is a legitimate QM, our</p>	<ol style="list-style-type: none"> 1. Retain MRZ over areas where MRZ is proposed in PC14 as notified unless otherwise changed by this submission. 2. Rezone to MRZ areas that are proposed as RS/ RSDT zones under the Public Transport Accessibility and Airport Noise Influence Area QMs. 3. Rezone Lyttelton to MRZ. 4. Rezone Papanui, Riccarton and Hornby Key Activity Centres to Metropolitan Centre Zone (MCZ) from Town Centre Zone and Large Format Retail Zone. 5. Rezone to HRZ areas that are proposed as MRZ within a Local Centre Intensification Precinct and remove the precinct. 6. Retain HRZ over areas where HRZ is proposed in PC14 as notified unless otherwise changed by this submission.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>submission raises concerns with whether the costs and benefits of this QM strike an appropriate balance, and question the appropriateness of using a threshold of a 1:500 year event plus a 1m rise in sea levels as the mapping base. Use of a lower density RS/ RSDT zoning should only be used where the risk of hazards is proven to be high and with a high return period.</p> <p>The areas subject to the 'Local Centre Intensification Precinct' are sought to be rezoned from MRZ to HRZ and the precinct overlay deleted. These areas are ideally located adjacent to medium-sized commercial centres that provide residential activities with easy access to a wide range of services and are also generally well serviced by public transport. As such, a HRZ is considered to be more appropriate and better aligned</p>	<p>7. Remove the Large Local Centre Intensification Precinct and replace with HDZ.</p> <p>8. Extend the boundary of HRZ in the Riccarton area as shown in the maps attached to this submission in Appendix 3.</p> <p>9. Delete the various height/ intensification precincts and replace with a single 'Height Variation Control' precinct to reflect the 36m height limit sought in the submission for the HRZ adjacent to the City Centre, Hornby, Riccarton, and Papanui centres as shown in the maps attached to this submission within Appendix 3.</p> <p>Generally these are:</p> <ul style="list-style-type: none"> - 22m HDZ 1.20km from the edge of the new MCZ and the CCZ. - 36m Height Variation Overlay 400m from the edge of the new MCZ and CCZ.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>with NPS-UD and National Planning Standard outcomes.</p> <p>Kāinga Ora submits that Metropolitan Centres be employed within the centres hierarchy. Kāinga Ora seeks that this covers the existing key activity areas for Riccarton, Papanui, and Hornby.</p> <p>Kāinga Ora support the inclusion of a HRZ in appropriate locations close to the City Centre, Metropolitan and larger suburban commercial centres. The zone boundaries for the HRZ is supported, with the only exception being in the Riccarton area where an extension of the HRZ boundaries are sought to better recognise the proximity of this area to a wide range of commercial services, university activity node, high frequency public transport, cycle ways, and the relief sought in the submission opposing the</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Riccarton Bush, Industrial Interface, Airport Influence Density Precinct, and Piko/Shands heritage area and character area QMs. Noting also the recommendation that Kāinga Ora has suggested in relation to amendments to the Industrial General Zoning at 247 Riccarton Road and 37 Euston Street.</p> <p>Kāinga Ora seeks to rationalise and simplify the height limits applicable to the HRZ, depending on the size of the adjacent commercial centre. Consequential amendments are therefore required to the various height/ intensification precincts to reflect the outcomes sought in the submission.</p>	
Chapter 3 - Strategic Directions					

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
2.	3.3	Objective 3.3.3 – Ngāi Tahu mana whenua	Support in Part	<p>The proposed amendment to clause (a)(ii) is supported.</p> <p>This objective is sought to also include explicit reference to enabling the ability of mana whenua to establish Papakāinga/Kāinga Nohoanga as an important tool in meeting their well-being and prosperity as sought in the amendment.</p>	<p>1. Amend clause (a)(ii) as follows:</p> <p>Ngāi Tahu mana whenua's aspirations to actively participate <u>priorities for their well-being and prosperity are recognised and provided for</u> in the revitalisation of Ōtautahi, <u>including the provision of Papakāinga/Kāinga Nohoanga are recognised</u>; and</p>
3.	3.3	Objective 3.3.4 – Housing bottom lines and choice	Support	Support the proposed reference to Papakāinga/Kāinga Nohoanga as a new clause (b)(ii).	Retain clause (b)(ii) as notified.
4.	3.3	Objective 3.3.7 – Well functioning urban environment	Support in Part	<p>Clause (a) implements legislative requirements and is supported. The balance of the objective is likewise supported, with the exception of clause (a)(i)(A) which confuses urban form with landscape outcomes and adds little meaningful value to the objective.</p> <p>Clause (a)(E)(iii) relating to mana whenua must include</p>	<p>2. Retain the objective as notified, except for:</p> <p>Delete clause (a)(i)(A) Contrasting building clusters within the cityscape and the wider perspective of the Te Poho-o-Tamatea/the Port Hills and Canterbury plains; and</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>explicit reference to Papakāinga/Kāinga Nohoanga.</p> <p>It is noted that the clause numbering/ formatting is unclear.</p>	<p>Amend clause (a)(E)(iii) as follows:</p> <ol style="list-style-type: none"> 1. The cultural traditions and norms of Ngāi Tahu mana whenua, <u>including the provision of Papakāinga/Kāinga Nohoanga</u> 2. Update clause numbering.
5.	3.3	Objective 3.3.8 – Urban growth, form and design	Support in Part	<p>In line with our submission raising concerns that the proposed character area QM does not meet s32 requirements, in the event that the character area provisions are deleted, then existing clause (a)(ii) is also sought to be deleted.</p> <p>Similarly in line with our submission raising consistency of heights in local centres, and in line with concerns of the public transport access qualifying matter clause (a)(iv.)(A) is sought to be amended. The other amendments sought in PC14 to this objective are supported.</p>	<ol style="list-style-type: none"> 1. Retain objective as notified, except for the deletion of existing clause (a)(ii): Has its areas of special character and amenity value identified and their specifically recognised values appropriately managed; and 2. Amend clause (a)(iv.)(A) as follows: <u>in and around the Central City, Key Activity Centres (as identified in the</u> <u>Canterbury Regional Policy Statement), Town Centre, and larger Local neighbourhood</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<u>centres, and nodes of core public transport routes; and</u>
6.	3.3	Objective 3.3.10 – Natural and cultural environment	Oppose	In line with our submission seeking the deletion of the tree canopy financial contribution rules, the related proposed reference to tree canopy in the strategic objectives is also opposed.	Delete proposed clause (a)(ii)(E): Tree canopy cover in areas of residential activity that maintains and enhances the city's biodiversity and amenity, sequesters carbon, reduces stormwater runoff, and mitigates heat island effects; and
7.	3.3	Objective 3.3.13 - Infrastructure	Oppose	In line with our submission seeking the deletion of the Airport Influence Density Precinct and our concern that the Qualifying Matter does not meet s32 requirements, amend Clause (b.)(iii.)	Delete clause (b.)(iii.).
Chapter 6 – Qualifying Matters					
8.	Sites of Ecological Significance	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards	Support	Kāinga Ora support the Sites of Ecological Significance, the Outstanding and Significant Natural Features, and the Sites of Cultural Significance qualifying matters, noting these	<ol style="list-style-type: none"> 1. Retain the Sites of Ecological Significance qualifying matter. 2. Retain the Outstanding and Significant Natural Features qualifying matter.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	<ul style="list-style-type: none"> Outstanding Natural Features and Landscapes Sites of Cultural Significance (Wāhi Tapu / Wāhi Taonga, Ngā Tūranga Tūpuna, Ngā Wai and Belfast Silent File) 	<p>and/or intensification enabled under Policy 3.</p> <p>9.1.4.1.1 P1 Indigenous vegetation clearance.</p> <p>9.1.4.1.3 RD3 – RD6 Indigenous vegetation clearance.</p> <p>9.1.4.1.5 NC1 and NC3 Indigenous vegetation clearance.</p> <p>8.5.1.3 RD11 Subdivision of land.</p> <p>8.9.2.3 RD5 Earthworks.</p> <p>9.2.4.1 Table 1(a) – (d), (i), (o) – (s) Outstanding natural features and landscapes.</p> <p>9.5.4.1.3 RD3 – RD6 Wāhi Tapu / Wāhi Taonga.</p>		<p>are all relevant matters of national significance in Section 6.</p> <p>It is also noted that there is very little overlap between Sites of Ecological Significance and Outstanding Natural Features and Landscapes with existing residential zones.</p>	<p>3. Retain the Sites of Cultural Significance qualifying matter.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		8.5.1.3 RD11 Subdivision of land. 8.9.2.3 RD5 Earthworks.			
9.	Slope Hazard Areas	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3. 5.6.1 Slope Instability Management Area	Support	Kāinga Ora support the management of significant risks from natural hazards as a qualifying matter (in appropriate circumstances), noting that it is a matter of national significance in Section 6. As slope hazards are less dynamic and have greater certainty as to their risk over time than flooding (submitted on below) and are not subject to constant change through hazard mitigation works, Kāinga Ora supports the Slope Hazard Areas qualifying matter.	Retain the Slope Hazard Areas qualifying matter.
10.	High Flood Hazard Management Area	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards	Support in Part	Kāinga Ora supports a risk-based approach to the management of natural hazards, however, opposes the inclusion of further hazard	1. Amend the provisions to remove / delete the mapped Hazard Management Areas from within the District Plan and instead hold this information in non-statutory GIS maps.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	Coastal Hazard Management Areas	and/or intensification enabled under Policy 3.		areas within the maps as part of the District Plan.	2. Reduce the Tsunami Management Area to a 1:100 year hazard.
		5.4.5 Flood Ponding Management Areas		Including Flood Hazard Areas in the District Plan ignores the dynamic nature of such hazards. Kāinga Ora accepts that it is appropriate to include rules in relation to these hazards but seeks that the rules are not linked to static maps.	3. Amend and make consequential changes to give effect to this submission.
		5.4.6 High Flood Hazard Management Areas			
		5.2.2.5.1 Managing development in Qualifying Matter Coastal Hazard Management Areas 5.4A.1 – 5.4A.6 Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area.		Other councils across the country adopt a set of non-statutory hazard overlay maps which operate as interactive maps on the respective Council's 'Geo Maps' website – a separate mapping viewer to the statutory maps. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 process under the RMA. Kāinga Ora notes that there is no formal requirement for hazard	
	Tsunami Management Area	5.2.2.5.2 Managing development within the Qualifying Matter Tsunami Management Area			
		5.4A.1 – 5.4A.6 Rules – Qualifying Matter Coastal Hazard Management Areas			

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		and Qualifying Matter Tsunami Management Area		<p>maps to be included within a district plan.</p> <p>Kāinga Ora also has concerns that the proposed policy approach relating to the Tsunami Management Area is too conservative, noting that Policy 24 of the NZCPS requires identification of areas in the coastal environment that are potentially affected by coastal hazards (including tsunami) over at least 100 years.</p> <p>Kāinga Ora also considers that the Council's intent to retain Residential Suburban / Residential Suburban Density Transition zoning in the Tsunami Management Area is disproportionate based on the modelled return period.</p>	
11.	Historic Heritage, Residential Heritage Areas, and Residential	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium	Support Historic Heritage.	Kāinga Ora generally supports the protection of areas of historic heritage where the requirements of Section 6 of the Resource Management Act	Delete the Residential Heritage Area qualifying matter and all proposed provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	Heritage Area Interface.	<p>Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.3.2.3 Building height - Residential Heritage Areas.</p> <p>14.5.3.2.7 Number of Residential Units Per Site - Residential Heritage Areas.</p> <p>14.5.3.2.8b, 8c Setbacks - Residential Heritage Areas.</p> <p>14.5.3.2.9 Building Coverage - Residential Heritage Areas.</p> <p>14.5.3.2.10c Outdoor living space - Residential Heritage Areas.</p>	Oppose Residential Heritage Areas.	<p>1991 ('RMA' or 'the Act') are met. However, Kāinga Ora opposes the new proposed Heritage Areas ('HAs') that are sought to be introduced under PC13 and PC14 in their entirety.</p> <p>Kāinga Ora does not consider that the proposed HAs meet the requirements of Section 6 of RMA to the extent that they should be accorded 'historic heritage' status of 'national' significance.</p> <p>Therefore, if these areas are considered to manage character (s7 RMA), rather than protect heritage, Kāinga Ora considers that a more nuanced assessment of costs and benefits applies to areas with a high proportion of Kāinga Ora housing, such as the proposed Piko/Shands character and heritage areas (i.e. the benefits of providing a greater number of houses for the most vulnerable members of society,</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>particularly in an area that has historically been used for social housing, are greater than retaining the character associated with existing housing per se, and therefore the character or heritage values of such locations must be carefully weighed to test the heritage values are existent and sufficiently so that they outweigh the social costs of lost development opportunity. We do not believe this test has been met.</p> <p>A more nuanced assessment of costs and benefits is likewise required for heritage areas in locations that are otherwise ideally located for further intensification, such as the heritage areas within and adjacent to the central city/ Four Avenues. Piko/ Shands is located in close proximity to both Riccarton and Church Corner commercial centres as well as an emerging high frequency public transport</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>corridor along Riccarton Road and a new major cycle way network. Were it not for the heritage and character area overlays, the Piko/ Shands area would merit a High Density zoning/ height limits.</p> <p>The imposition (costs) of character controls in locations that would otherwise suit high density housing must therefore be greater than the costs applying to character areas more generally. It follows that the benefits of such regulation and the identification of these areas as Qualifying Matters must therefore be greater than the benefits generally in order to justify additional regulation.</p> <p>It is further noted that having some of the Heritage Area provisions being contained in PC14 and following an IPI process i.e. the built form standards, and other Heritage Area provisions being progressed through a separate</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>PC13, and following a first schedule process i.e. Heritage Area policies has created efficiency issues.</p> <p>Consistency is sought with the Kāinga Ora submission on Plan Change 13 ("PC13"), which Kāinga Ora opposed the approach of establishing 'Historic Heritage Areas' in its entirety.</p> <p>Kāinga Ora is seeking the spatial application of residential zones to be applied across the City, regardless of the nature and extent of the current and proposed 'Heritage Areas' set out by Council in PC13. Kāinga Ora seeks the deletion of any proposed changes in PC14 that seek amendments to historic heritage and special character, consistent with the relief sought in PC13.</p> <p>Kāinga Ora considers that the proposed changes across PC13 and PC14 are not</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				qualifying matters, as the assessments in its view, do not meet the requirements under s6, s77I, s77J, s77K, and/or s77L of the RMA.	
12.	Significant and Other Trees (excluding those not identified as Qualifying Matters).	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>9.4.4.1.1 P1 – P12 Tree pruning, felling, earthworks.</p> <p>9.4.4.1.2 C1 Tree maintenance.</p> <p>9.4.4.1.3 RD1 – RD8 Tree pruning, felling, earthworks.</p> <p>9.4.4.1.4 D1 – D2 Tree pruning, felling 9.4.7.1 Appendix – Schedules of significant trees.</p>	Support in Part	<p>Kāinga Ora support the Significant and Other Trees qualifying matter.</p> <p>The rules in Chapter 9 of the District Plan sufficiently recognise and provide for the management of notable trees. Such rules provide a suitable framework for considering new buildings in proximity to notable trees, or their removal.</p> <p>Rule 9.4.4.1.1 P12 triggers the need for resource consent for earthworks within 5m of a street tree, however consent is always granted provided the works are undertaken by, or under the supervision of, a works arborist. The relief sought would reduce costs and the reliance on the resource consent process and is therefore more consistent</p>	<ol style="list-style-type: none"> 1. Retain Significant and Other Tree Qualifying Matter. 2. Amend Rule 9.4.4.1.1 P12 as follows: <p>Rule 9.4.4.1.1 P12 - Activities shall be undertaken by, or under the supervision of, a works arborist. employed or contracted by the Council or a network utility operator.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				with Objective 3.3.2.	
13.	Waterbody setbacks	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>6.6.4 City and Settlement Water Body Setbacks 6.6.4.1 – 6.6.4.4 Activities within water body setbacks</p>	Support in Part	<p>Section 6 seeks the preservation of rivers and their margins and their protection from inappropriate subdivision, use and development. Similarly, Section 6 also recognises and provides for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga.</p> <p>Kāinga Ora is supportive of these Section 6 matters being identified as a qualifying matter. However, where the identified waterbodies do not meet a Section 6 threshold, such as for 'Environmental Asset Waterways' and 'Network Waterways' use of waterway setbacks as a qualifying matter, Council needs to demonstrate why development that is otherwise permitted under</p>	Remove 'Environmental Asset Waterways' and 'Network Waterways' as qualifying matter, unless a site by site assessment has been undertaken that demonstrates why development that is otherwise permitted under MDRS is inappropriate.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>MDRS is inappropriate, for every specific waterway (and adjacent site) where a qualifying matter is proposed.</p> <p>The existing provisions in Chapter 6.6 of the District Plan are sufficient.</p>	
14.	Public Open Space areas; and Ōtākaro Avon River Corridor.	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>18.4 to 18.96.1A Qualifying matters</p> <p>13.14 Specific Purpose (Ōtākaro Avon River Corridor) Zone – All provisions, including Appendix 13.14.6.2 specifying alternative zone provisions applicable to privately owned properties within the zone</p>	Oppose	<p>Kāinga Ora considers this qualifying matter is unnecessary and seek that it is deleted.</p> <p>While the use of areas for open space purposes is identified as a qualifying matter under RMA s77O(f), the areas zoned Open Space are owned by CCC and many are administered under the Reserves Act 1977. Council ownership, and Open Space zoning, makes it unlikely that these areas will be developed for medium density housing and such development would also be contrary to the purposes for which these sites were reserved. Further, the Housing Supply Act only requires CCC</p>	Delete the Open Space (recreation zone) qualifying matter and any relevant provisions proposed in its entirety.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>15.4.3.2.1 Maximum building height;</p> <p>Appendix 15.15.1 Town Centre Zone (Belfast/Northwood) Outline Development Plan</p>		<p>to incorporate MDRS into every relevant residential zone (not Open Space Zone).</p> <p>The s77O(f) matter is noted as being relevant for other councils where their District Plan does not include an Open Space zone and instead reserves often have a residential zoning.</p> <p>As with the Open Space Zones, Kāinga Ora note that the Ōtākaro 'red zone' area has been subject to detailed place-based assessment, with large-scale residential development not anticipated in this area.</p>	
15.	Residential Character Areas	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.3.1.1 P4 Conversion to two residential units –</p>	Oppose in Part	<p>Kāinga Ora support, in principle, the management of character as a qualifying matter. However, Kāinga Ora does not consider appropriate justification has been provided for the proposed new or extended 'character areas' set out in PC13 and PC14 to demonstrate that they contain specific characteristics that</p>	<ol style="list-style-type: none"> 1. Delete all new or extended character areas as qualifying matters and undertake further analysis to determine the exact values of the resources that the Council seeks to manage in the District Plan. 2. For existing character areas retain the controlled activity status for new buildings that exists in the Operative Plan - Rule 14.5.3.1.2 C1.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>Character Area Overlays</p> <p>14.5.3.1.2 C1 Character Area Overlays – new residential units to rear</p> <p>14.5.3.1.3, RD6, RD14 Area-specific rules and character overlays.</p> <p>14.5.3.2.3 Building height – Character Area Overlays.</p> <p>14.5.3.2.5 – 14.5.3.2.14 Built form rules – Character Area Overlays.</p> <p>14.15.27 Matters of discretion - Character Area Overlays.</p> <p>14.8.1.1 P18 – Conversion to two residential units –Lyttelton Character Area.</p> <p>14.8.3.1.1 P5 – Minor residential unit in Lyttelton Character Area or Lyttelton Residential Heritage Area.</p>		<p>make the level of development provided by the MDRS or policy 3 inappropriate in the area. Further, they blur the line between the protection of historic heritage values as set out under s6(f) of the RMA, and amenity values as set out under section 7 of the RMA. This is especially the case where both character and heritage area overlays apply to the same geographic area.</p> <p>Kāinga Ora questions the planning method and assessment undertaken to determine the proposed provisions.</p> <p>Kāinga Ora considers that any such provisions and values identified should be ‘managed’ rather than ‘protected’ in the District Plan. Kāinga Ora seeks the provisions as proposed are deleted and that further analysis is undertaken to determine the exact values of the resources that the Council</p>	<p>14.5.3.2.3 Building height – Character Area Overlays, and</p> <p>14.5.3.2.5 – 14.5.3.2.14 Built form rules – Character Area Overlays.</p> <p>3. In the event that the Character Area qualifying matter remains, explicit provision is sought for the ability to develop Papakāinga/Kāinga Nohoanga, noting that local Rūnanga have purchased the former Lyttelton West School Site.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>14.8.3.1.2 C3 – New residential unit to rear Lyttelton Character Area.</p> <p>14.8.3.1.3 RD3 – Lyttelton Character Overlay – new buildings, alterations etc.</p> <p>14.8.3.1.3. RD5-RD7, RD9 – not meeting Lyttelton Character Area or Residential Heritage Area built form rules</p> <p>14.8.3.1.3 RD8, RD10 –not meeting Lyttelton Character Area built form rules.</p> <p>14.8.3.1.3 RD11 - Lyttelton Character Area or Lyttelton Residential Heritage Area – not meeting minor residential units rules.</p> <p>14.8.3.2.2 –14.8.3.2.6 Built form rules – Lyttelton Character Area or Lyttelton Residential Heritage Area.</p> <p>14.8.3.2.7 – 14.8.3.2.12 -Built form rules – Lyttelton Character Area only.</p>		seeks to manage in the District Plan.	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
16.	Electricity Transmission Corridors.	<p>6.1A Qualifying matters.</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.4.1.5 NC6 – NC7 National Grid transmission and distribution lines.</p> <p>14.5.1.5 NC2 – NC3 National Grid transmission and distribution lines.</p> <p>14.7.1.5 NC2 National Grid transmission and distribution lines.</p> <p>14.12.1.5 NC1 – NC2 National Grid transmission and distribution lines.</p>	Support	Kāinga Ora support this qualifying matter noting that the qualifying matter only relates to the National Grid Transmission Lines (nationally significant infrastructure) in accordance with s771(e) and no other lesser category of line.	Retain Electricity Transmission Corridors qualifying matter only to the extent of the corridor as defined in the NES ET.
17.	Airport Noise Influence Area	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the</p>	Oppose in Part	Kāinga Ora seeks that the Airport Noise Influence Area qualifying matter be deleted thus allowing all existing	Delete this qualifying matter and all proposed provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>Safe or efficient operation of nationally significant infrastructure (Christchurch Airport)</p> <p>14.4.1 – 14.4.4, 14.13, 14.14 Low Density Residential Airport Influence Zone and Airport Influence Density Precinct.</p>		<p>residential zoned land within the Airport Noise Influence Area to be zoned Medium Density Residential as per the direction in the Act.</p> <p>While Kāinga Ora agrees that it is appropriate to protect strategic infrastructure (including Christchurch International Airport) from reverse sensitivity effects, it does not consider that restricting density under the Airport Noise Influence Area is necessary to avoid reverse sensitivity effects. Further, Kāinga Ora considers that the health, safety and amenity of existing and future residents living within the Airport Noise Influence Area would be appropriately maintained if the land was zoned Medium Density Residential. Any new buildings and additions to existing buildings located within the 55 dB Ldn air noise contour or the 55 dB Ldn engine testing contour would continue to be</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				subject to the acoustic insulation standards set out at Rule 6.1.7.2.2 (Activities near Christchurch Airport) in the District Plan as required by Policy 6.1.2.1.5 b. ii. (Airport noise).	
18.	Lyttelton Port Influence Overlay	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.8.3.1.1 – 14.8.3.1.5 Area-specific rules - Lyttelton Port Influences Overlay</p>	Support	<p>Kāinga Ora support the Lyttelton Port Influence Overlay qualifying matter noting that the qualifying matter only relates to nationally significant infrastructure in accordance with s771(e).</p> <p>Kāinga Ora does not oppose the noise insulation standards.</p> <p>Kāinga Ora notes that the geographic area covered by the Port Influence Overlay is small and overlaps with a proposed Heritage Area. Furthermore, the Port is obliged to pay for the acoustic insulation of existing dwellings within the contour (Rule 13.8.4.2.7), so the scale, plus the costs and benefits, are markedly different between the</p>	Retain Lyttelton Port qualifying matter.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Port Influence Overlay and the Airport Noise Influence Area qualifying matter.	
19.	NZ Rail Network Interface Sites.	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>6.1.7 Activities near infrastructure.</p> <p>14.4.1.3 RD28 and 14.4.2.7 Setback from rail corridor.</p> <p>14.5.1.3 RD12 and 14.5.2.7 Setback from rail corridor.</p> <p>14.8.1.3 RD16 and 14.8.2.4 Setback from rail corridor.</p>	Oppose	Kāinga Ora considers that the standard internal boundary setback for zones is appropriate.	Delete NZ Rail Network Interface Sites qualifying matter.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		14.12.1.3 RD13 and 14.12.2.5 Setback from rail corridor.			
20.	Radio Communication Pathways for the Justice and Emergency Services Precinct.	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>6.12 Radio communication Pathway Protection Corridors.</p>	Neutral	Kāinga Ora recognise the need to maintain radio communication for emergency services, and does not provide any further feedback.	Note: Table 1 in Chapter 6.1A references an abbreviation rather than the qualifying matter rule reference.
21.	Vacuum Sewer Wastewater Constraint Areas	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>8.9A Waste water constraint areas</p>	Support in Part	<p>Kāinga Ora recognise the need to ensure sufficient infrastructure is available to service developments.</p> <p>The Restricted Discretionary Activity status and the relevant matters of discretion are generally considered appropriate, however an additional matter of discretion that provides a consenting pathway for intensification in</p>	<p>Amend as follows:</p> <p>The Council's discretion shall be limited to the following matters:</p> <p><u>c. The ability to connect into any nearby non-vacuum wastewater system.</u></p> <p><u>d. The extent to which alternative waste water solutions are available that do not adversely affect the</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				these areas where infrastructure constraints can be addressed by alternative means is required.	<u>function of the Council's waste water systems.</u>
22.	Sunlight Access	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.2.6 – Height in relation to boundary,</p> <p>14.6.2.2 – Height in relation to Boundary, 14.15.2 – Diagram D.</p>	Oppose	Kāinga Ora oppose 'Sunlight Access' being a qualifying matter and considers this to be inconsistent with the requirements of Section 77L.	Delete the Sunlight Access qualifying matter and all associated provisions.
23.	Low Public Transport Accessibility.	<p>14.1 Introduction,</p> <p>14.2 Objectives and Policies,</p> <p>14.3 How to interpret and apply the rules, 14.4 Rules - Residential Suburban Zone and Residential Suburban Density Transition Zone, 14.7</p>	Oppose	Kāinga Ora opposes the 'Low Public Transport Accessibility' being a qualifying matter and considers this to be inconsistent with the requirements of Section 77L.	<ol style="list-style-type: none"> 1. Delete the Low Public Transport Accessibility Qualifying Matter and all associated provisions. 2. Rezone all areas subject to this QM to MRZ.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		Rules - Residential Hills Zone, 14.8 Rules - Residential Banks Peninsula Zone, 14.15 Rules - Matters of control and discretion, 14.16 Rules - Appendices – all as they apply to areas that are zoned Residential Suburban or Residential Hills, or in Lyttelton zoned Residential Banks Peninsula.		Kāinga Ora is particularly concerned to note the large areas with inadequate services in the eastern parts of the District, where the lack of such services has the potential to exacerbate existing social inequalities.	
24.	Industrial Interface	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>8.6.15 North Halswell – additional standards 8.7.13 North Halswell – additional matters – Medium and High Density Residential Zones in North Halswell 8.8.17 North Halswell – additional matters of discretion.</p>	Oppose	<p>Kāinga Ora considers that effects from industrial activities should first be mitigated at the source.</p> <p>The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p>	Delete the Industrial Interface Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be appropriate with the benefits of the QM not outweighing the costs.	
25.	Riccarton Bush Interface	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.2.3 Medium Density Residential Zone – Building height.</p> <p>14.4.2.3 Residential Suburban Zone – Building height.</p>	Oppose	<p>Kāinga Ora considers that the existing long-established Operative Plan rules requiring a 10m building and earthworks setback from boundaries with the Bush are appropriate for managing potential interface issues/ impacts on tree health. The retention of the existing setback is quite different from the proposed QM which extends across roads and goes some distance from the Bush itself.</p> <p>The area around Riccarton Bush is ideally located for supporting a High Density</p>	<ol style="list-style-type: none"> 1. Delete the Riccarton Bush Interface Qualifying Matter and all associated provisions. 2. The existing tree setbacks in Chapter 9.4 are retained.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Residential Zone given its close proximity to a Metropolitan centre, cycleways, high frequency bus routes, and the large university activity hub.	
26.	Key Transport Corridors – City Spine	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.2.18 – Spine Road setbacks.</p> <p>14.6.2.17 - Spine road setbacks.</p> <p>15.4.2.10 – spine corridor setbacks.</p> <p>15.5.2.10 Setback from corridor.</p>	Oppose	<p>Kāinga Ora oppose the ‘City Spine’ being a qualifying matter and considers this to be inconsistent with the requirements of Section 77L.</p> <p>The associated rules require buildings and outdoor living spaces to be set back from spine road corridors in both residential and commercial zones. In commercial zones there is a direct conflict in urban design outcomes (and rules) where the Key Pedestrian Frontage rules require buildings to be built up to the road boundary in order to deliver good urban design outcomes and facilitates a continuous street edge (often with veranda cover for pedestrians).</p>	Delete the Key Transport Corridors – City Spine Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		15.6.2.11 Setback from corridor. 15.8.2.13 Setback from corridor. 15.10.2.10 Setback from corridor. 15.12.2.13 Setback from corridor. 15.14.5.3 Matters of Discretion.		<p>It is understood that the intention of the rule is to enable road widening in the future to accommodate public rapid transit. If Council's intention is to acquire land in the future to facilitate public works then it should use the designation powers available to it.</p> <p>Given the highly developed nature of these existing corridors with lengthy sections of commercial property built to the road boundary, it is unclear how any corridor-long road widening will occur without major land acquisition and demolition.</p>	
27.	Sites of historic heritage items and their settings (City Centre Zone) - Cathedral Square, New Regent Street, the Arts Centre.	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.	Support	Kāinga Ora support the management of Historic Heritage as a qualifying matter, noting that Cathedral Square, New Regent Street and the Arts Centre contain individually listed heritage items and are within identified heritage settings. This is a matter of	Retain sites of historic heritage items and their settings (City Centre Zone) - Cathedral Square, New Regent Street, the Arts Centre.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		15.11.1.2 C2 Works at 100 Cathedral Square 15.11.1.3 RD9 Works at 100 Cathedral Square 15.11.1.3 RD11 buildings on New Regent Street, the Arts Centre, and in the Central City Heritage Qualifying Matter and Precinct 15.11.2.11 Building height in area-specific precincts		national significance in Section 6.	
28.	Belfast/Northwood Outline Development Plan Features	15.4.3.2.1 Maximum building height; Appendix 15.15.1 Town Centre Zone (Belfast/Northwood) Outline Development Plan.	Neutral	Kāinga Ora does not have a view on this site-specific qualifying matter.	
Chapter 5 – Natural Hazards					
29.	5.5	Policy 5.2.2.5.1 – Managing development in Qualifying Matter Coastal Hazard Management Areas	Support in Part	Kāinga Ora support the management of significant risks from natural hazards as a qualifying matter (in appropriate circumstances), noting that it is a matter of national significance in Section 6.	Amend the policy as follows: Within the following Qualifying Matters, development, subdivision and land use that would provide for intensification of any site shall be avoided, unless the risk is from coastal inundation and a site specific assessment demonstrates the

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Kāinga Ora generally supports the risk based approach to the management of natural hazards but considers that the avoidance of intensification should be reserved to high risk from coastal inundation.</p> <p>Rule 5.4A.4 D1 requires resource consent for new buildings, other than accessory buildings, extensions etc, in areas shown on the planning maps as Qualifying Matter Coastal Hazard Medium Risk Management Area as a Discretionary Activity. Even with a site specific assessment however, Policy 5.2.2.5.1 seeks to avoid this.</p>	<p>risk is medium, low or very low based on thresholds defined in Table 5.2.2.5.1a below:</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
30.	5.5	Policy 5.2.2.5.2 - Managing development within Qualifying Matter Tsunami Management Area	Support in Part	<p>Kāinga Ora considers that the Council's intent to retain Residential Suburban / Residential Suburban Density Transition zoning in the Tsunami Management Area is disproportionate based on the modelled return period. This may be appropriate for 1:100 or 1:200, especially if such areas are also covered by high flood and/or coastal inundation risk overlays.</p> <p>Kāinga Ora seeks changes to the wording of Policy 5.2.2.5.2 to provide certainty of the outcomes intended, noting that the rule allows for up to four residential units to be constructed on these sites (Rule 14.4.1.1 P4, P5 and P6) so there is a disconnect between the use of the term 'avoid' and what the provisions would allow for as a permitted activity.</p>	<ol style="list-style-type: none"> Amend Policy 5.2.2.5.2 as follows: Within the Tsunami Management Area Qualifying Matter, avoid discourage development, subdivision and land use that would provide for intensification of any site, unless the risk to life and property is acceptable. Alternatively the Policy framework could be retained if the geographic extent of the QM matter is better aligned with a 1:100 return period or covers an area reflective of the Tsunami Inundation area identified by the Greater Christchurch Partnership as part of its consultation on the Greater Christchurch Spatial Plan.
31.	5.4	Flood hazard provisions	Support in Part	Kāinga Ora seek that spatial identification of flood hazard	<ol style="list-style-type: none"> Amend the provisions to remove / delete the mapped Hazard

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				management areas are made available through a set of non-statutory maps, which would operate as interactive maps on the Council's GIS website – thereby operating as a separate mapping viewer to the statutory District Plan maps. This approach is different to that of the traditional means of displaying hazard overlays on district plan maps and reflects that these maps do not have regulatory effect. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 Resource Management Act 1991 process. Kāinga Ora notes that this is an approach taken by other Councils around the country.	<p>Management Areas from within the District Plan and instead hold this information in non-statutory GIS maps.</p> <ol style="list-style-type: none"> 2. Delete all references to maps within the District Plan. 3. Undertake any consequential amendments to zones, overlays, precincts, and qualifying matters to reflect the relief sought in the submission.
32.	5.4.1.3	Exemptions for daylight recession planes in the Flood Management Area	Support in Part	Kāinga Ora seeks for the applicable daylight recession planes in all residential zones to	Amend rules as follows:

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				be determined as if the ground level at the relevant boundary was the minimum floor level set in the activity specific standards in Rule 5.4.1.1, or natural ground level, whichever is higher.	<p>5.4.1.3 a. For P1 and P2 in Rule 5.4.1.1, the applicable daylight recession plane in residential zones (other than in the Medium Density Residential Zone and High Density Residential Zone) shall be determined as if the ground level at the relevant boundary was the minimum floor level set in the activity specific standards in Rule 5.4.1.1, or natural ground level, whichever is higher.</p> <p>5.4.1.3b. For P3 and P4 in Rule 5.4.1.1, the applicable daylight recession plane in residential zones (other than in the Medium Density Residential Zone and High Density Residential Zone) shall be determined as if the ground level at the relevant boundary was the minimum floor level specified in the Minimum Floor Level Certificate issued under Rule 5.4.1.2, or natural ground level, whichever is higher.</p> <p>5.4.1.3 c</p> <p>viii. Rule 14.5.2.6 Height in relation to boundary – Medium Density Residential Zone</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					ix. Rule 14.6.2.2 Height in relation to boundary – High Density Residential Zone
33.	5.4A	Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area	Oppose in Part	Kāinga Ora seek that spatial identification of coastal hazard management areas be made available through a set of non-statutory maps, which would operate as interactive maps on the Council's GIS website – thereby operating as a separate mapping viewer to the statutory District Plan maps. This approach is different to that of the traditional means of displaying hazard overlays on district plan maps and reflects that these maps do not have regulatory effect. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 Resource Management Act 1991 process. Kāinga Ora notes that this is an approach	<ol style="list-style-type: none"> 1. Delete all references in all rules in this section that refer to maps. 2. Include a rule to provide for a Controlled Activity to subdivide within the Tsunami Management Area. 3. Amend Rule 5.4A.5 NC3 as follows: <ol style="list-style-type: none"> a. Development, subdivision and land use that would provide for residential intensification of any site within the Qualifying Matter Tsunami Management Area except that permitted or controlled in Rules 14.4.1 and 14.4.2. 4. Any consequential amendments to zones, overlays, precincts, and qualifying matters to reflect the relief sought in the submission.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>taken by other Councils around the country.</p> <p>Rule 5.4A.5 NC3 makes development, subdivision and land use that would provide for residential intensification of any site within the Qualifying Matter Tsunami Management Area except that permitted or controlled in Rule 14.4.1 a non-complying activity.</p> <p>Rule 14.4.2 deals with controlled activities so the rule outlined above needs to be amended to reference Rule 14.4.2.</p> <p>There is no applicable rules in the subdivision chapter for the Tsunami Management Area.</p> <p>Rule 14.4.1 provides for up to four residential units to be constructed as a permitted activity. If this level of intensification is provided for, then having a non-complying</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				activity status and an avoid policy seems nonsensical.	
Chapter 6 – General Rules and Procedures					
6.10A – Tree Canopy Cover and Financial Contributions					
34.	6.10A	6.10A Rules 8.3, 8.5.1 and 8.7.12 - Subdivision; Rules 14.4.2 – 14.11.2 – Residential Built Form Standards. 14.6.1.3 RD13. 14.6.2.7 - Landscaping and tree cover.	Oppose	Kāinga Ora welcomes the Council's recognition of trees as a key element in successful urban environments. Kāinga Ora strongly support the Council increasing its prioritisation of the need to renew streetscapes, especially in areas where intensification has and will continue to occur. Such renewals should include kerb and channel replacement, undergrounding of overhead wires, and street tree planting. Kāinga Ora has substantial concerns with the 20% tree canopy cover target and considers it fundamentally	Delete Section 6.10A and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>unachievable in medium and high density environments on private land. Kāinga Ora consider the requirements to achieve 20% tree canopy cover is inconsistent with the spatial outcome requirements set out in the NPS-UD, and the Medium Density Residential Standard (MDRS) provisions of the Housing Supply Act.</p> <p>Kāinga Ora considers that the proposed financial contribution calculator is complicated and flawed, a simpler formula would be to require 1 tree to be planted per 100m² of site area, as an easier compliance threshold than a trigger of 10% of future canopy cover.</p> <p>It also has concerns with the reliance on Financial Contributions. Given that Council already own extensive areas of park and open space land (including several thousand hectares of land on</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>the Port Hills and Red Zone), in addition to extensive road reserve and local park areas, and given that Council takes Development Contributions for new parkland as part of any new development, the need for the land component to form part of the financial contributions appears to be particularly hard to justify.</p> <p>The need to provide rapid canopy cover potentially creates a perverse incentive to plant faster growing exotic species rather than natives. The proposed Financial Contribution could therefore result in a decline in biodiversity by driving developers to plant exotics over natives, with attendant adverse biodiversity outcomes, which is contrary of the desire in the Urban Forest Plan to seek diversity in tree species.</p>	
Chapter 8 – Subdivision, Development and Earthworks					

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
35.		Policy 8.2.2.1 – Recovery activities	Support in Part	<p>PC14 seeks to delete this policy which provides for a range of intensification opportunities in the RS and RSDT zones.</p> <p>Deletion of this policy may well be appropriate if MRZ is properly implemented across all relevant residential zones and the Kāinga Ora submission opposing the Public Transport and Airport Noise Influence Area QMs is confirmed i.e. the only areas which retain low density RS/ RSDT/ RHZ zoning are those subject to a high risk of natural hazards.</p>	Delete the policy as notified.
36.		Policy 8.2.3.2 – Connections to infrastructure	Support	<p>PC14 proposes an additional clause (g) relating to development in the vacuum sewer area. This policy provides for development in the area if connection is able to be made to a part of the waste water system that is not part of the vacuum sewer, or if sufficient capacity can be demonstrated (which could be for example through -on-site</p>	Retain Clause (g) as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				holding tanks and off-peak pumping into the network).	
37.		<p>Tree Canopy and Financial Contribution provisions:</p> <p>Objective 8.2.6 and associated policies;</p> <p>Clause 8.3.1(e)-(f) – how to apply to the rules</p> <p>Clause 8.3.3(b) – financial contributions</p> <p>Clause 8.3.7 – consent notices</p> <p>Clause 8.7.12 – Assessment matters</p>	Oppose	In line with our submission seeking the deletion of the tree canopy financial contribution rules, the related proposed references to tree canopy in the subdivision chapter policies and rules is also opposed.	Delete the provisions relating to the tree canopy financial contribution and associated tree canopy rules.
38.		8.4.1.1 - Notification	Support	Support clause (a)(i) that any controlled or restricted discretionary subdivision application shall not be publicly or limited notified.	Retain 8.4.1.1 as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
39.		8.5.1.2 – Controlled activities – C8 and C9	Support	Support controlled activity status for the creation of vacant allotments (C8) or allotments containing an existing or consented dwelling (C9), where these allotments comply with density standards.	Retain C8 and C9 as notified
40.		8.5.1.3 – Restricted discretionary activities – RD2(c) and RD2A	Support	Support restricted discretionary activity status where the proposed allotments do not comply with C8 or C9.	Retain RD2(c) and RD2A as notified.
41.		8.6.1 – minimum dimensions	Oppose	<p>Support the use of a minimum dimension for the creation of vacant sections. However, Kāinga Ora recommends an 8m x 15m minimum shape factor for MRZ and HRZ sites as this is demonstrated as practicable to construct a permitted medium density residential dwelling.</p> <p>The rule needs clarification that the minimum sizes apply to the creation of vacant lots, rather</p>	<p>Amend clause 8.63.1(c) as follows:</p> <p><u>The creation of vacant allotments that do not contain an existing or consented residential unit Allotments</u> in the Medium Density (including MRZ Hills), and High Density Residential Zones, shall have <u>accommodate</u> a <u>minimum dimension shape factor</u> of <u>10m 8m x 15m. Within the Medium Density Residential (Residential Hills Precinct) Zone the allotment shall have a minimum dimension of 17m x 12m.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>than lots with an existing or consented dwelling.</p> <p>Similarly clarity needs to be retained that is explicit that the minimum net site provisions shall not apply to sites used exclusively for access, reserves, or infrastructure, or which are wholly subject to a designation.</p>	<p><u>This shape factor shall be located outside of:</u></p> <ol style="list-style-type: none"> <u>1. Land which may be subject to instability or is otherwise geotechnically unsuitable;</u> <u>2. Any existing or proposed easement areas required for access or services purposes;</u> <u>3. Network Utilities, including private and public lines.</u>
42.		<p>Table 1 – Minimum net site area</p> <p>Clause (a) and (c)</p> <p>Table 6 – Allotments with existing or proposed buildings</p>	Oppose	Kāinga Ora opposes both Table 1 and Table 6 and consider that the minimum shape factor provision proposed above is more appropriate	Delete Table 1 and Table 6.
44.		<p>8.9.2.1 – Earthworks</p> <p>Table 9</p>	Support in Part	<p>Earthworks are permitted through rule 8.9.2.31(P1), provided they comply with the volumes specified in Table 9.</p> <p>Table 9(d) in the Operative Plan limits earthworks to no more</p>	Amend Table 9(d) so the maximum volume is <u>50m³250m³/ site net fill above existing ground level</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>than 20m³ in all residential zones. Whilst these volumes do not include earthworks associated with a Building Consent i.e foundation construction, they are invariably triggered through the formation of driveways and landscaping. In practice, a 20m³ limit is frequently triggered for low density suburban development let alone medium density outcomes. As an example a standard driveway for a single dwelling is 4m wide by say 30m long = 120m². To build the driveway requires existing earth to be removed to a depth of 20cm, and then replaced with basecourse prior to being gravelled or asphalted. There is no change to existing ground levels. The cut is 24m³ (120m² x 0.2m depth), with fill being the same, resulting in 48m³.</p> <p>The rule threshold is considered to be unrealistically low, such that it generates numerous consents that are</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>invariably granted. The key effects that need to be controlled with earthworks are erosion and sediment control during construction (although the scale of such works means that they are generally completed within a couple of days and therefore do not generated significant risks of sediment discharge), and permanent changes to finished ground levels that would result in overlooking of neighbouring properties i.e. forming raised mounds or terraces.</p> <p>It is therefore sought that the rule be amended so the volume is net fill above existing ground levels. It is noted that filling within Flood Management Areas is separately controlled in Chapter 5.</p>	
Chapter 12 - Papakāinga/ Kāinga Nohoanga Zone and Chapter 8 subdivision					
45.	12.4.1 and 12.5.1	Activity status tables and built form rules	Support in Part	Kāinga Ora seek that the Papakāinga Zone be retained	Amend the Papakāinga/Kāinga Nohoanga Zone activity table and built

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				as a specific zone, given its unique policy outcomes and function. We seek that the MRZ built form rules however apply to the Papakāinga Zone. The activity status tables and built form standards are sought to therefore be amended to align with MRZ outcomes i.e. the Papakāinga Zone rules controlling matters such as height, boundary setbacks etc should simply align with those in the MRZ.	form standards to align with the built form rules in the MRZ.
46.	Chapter 8	Subdivision provisions relating to the Papakāinga/ Kāinga Nohoanga Zone	Oppose	The suite of subdivision provisions relating to minimum site sizes for the Papakāinga/ Kāinga Nohoanga Zone are sought to also be amended to align with MRZ outcomes.	Amend the subdivision standards for the Papakāinga/ Kāinga Nohoanga Zone to align with MRZ outcomes.
Residential Zone Introduction and Policy Framework – 14.1-14.2					
47.	Residential	14.1(e) Introduction to residential policies	Support in Part	Helpful statement for plan interpretation	<p>Retain statement.</p> <p>Amend reference at the end of the statement to "...subclause g f"</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
48.	Residential	14.2.1 – Objective - housing supply	Support	Support amendments given that Christchurch has moved beyond the immediate earthquake recovery period. Support recognition that the community's housing needs may change, and that provision needs to take into account future needs.	Retain the objective
49.	Residential	Policy 14.2.1.1 – Policy – Housing distribution and density	Support in Part	<p>Support the amendments to clause (a)(ii) and (iii) that clearly state the expectation that high density residential development will be established in both the Central City and in and near identified commercial centres.</p> <p>By amending clause (iii) to now reference high density, the policy is now silent on the locations and expectation of medium density development. Given that the introduction of MRZ across most of the City, there is a need for a clear statement in the policy regarding what is now the normative housing density.</p>	<p>Retain clauses (a)(ii) and (iii).</p> <p>Add a new clause (a)(iv) as follows (with consequential renumbering of subsequent clauses):</p> <p><u>(iv) medium density residential development is established across the majority of the City unless precluded by a qualifying matter.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
50.	Residential	Table 14.2.1.1a – Zone descriptions	Support	The proposed MRZ and HRZ descriptions align with the National Planning Standards descriptions.	Retain zone descriptions
51.	Residential	Policy 14.2.1.2 and 14.2.1.3	Support	Support deletion of these two policies as their original policy direction regarding the location of new medium density areas no longer aligns with the direction in the Enabling Act.	Support the deletion of these two policies.
52.	Residential	Objective 14.2.2 and associated policies 14.2.2.1-14.2.2.4 – short term recovery	Oppose	<p>Given that Christchurch is now some 12 years post-earthquake there may no longer be a need for these policies and associated mechanisms such as the 'Enhanced development mechanism' (EDM) and the 'Community Housing Redevelopment Mechanism'(CHRM).</p> <p>The housing opportunities and more enabling built form standards now provided through the MRZ and HRZ may make this suite of policies and short-term recovery tools unnecessary, however if the</p>	Delete Objective 14.2.2 and associated policies 14.2.2.1-14.2.2.4 and the associated EDM and CHRM in the event that the Public Transport accessibility QM is removed, and the Tsunami Hazard QM reduced to 1:100 year hazard.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				QM are retained and large parts of the city retain RS or RSDT then the EDM and CHRM are sought to remain as important tools.	
53.	Residential	Objective 14.2.3 and associated policies 14.2.3.1-14.2.3.5 - MDRS	Support	The objective and associated policies align with the policies mandated in the Enabling Act.	<p>Retain the objective and associated policies.</p> <p><i>Note that sequentially Policy 5 (14.2.3.3) should come at the end i.e. the policy 'batting order' should be 1 to 5 rather than the current arrangement of 1,2, 5, 3, 4.</i></p>
54.	Residential	Policy 14.2.2.2 b. iv. (Recovery housing higher density comprehensive redevelopment)	Oppose	Provided the Airport Noise Influence Area qualifying matter is deleted, the reference in Policy 14.2.2.2 b. iv. to Christchurch International Airport is unnecessary given the relevant land will be zoned for medium density residential development.	<p>14.2.2.2 Policy - Recovery housing higher density comprehensive redevelopment</p> <p>a. Enable and incentivise higher density comprehensive development of suitably sized and located sites within existing residential areas, through an Enhanced development mechanism which provides:...</p> <p>iv. Christchurch International Airport, arterial traffic routes, and railway lines.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
55.	Residential	Policy 14.2.3.6 – Framework for building heights	Oppose	<p>The policy does not provide a framework or rationale for the proposed heights and does not specify what the 'specific conditions' might be when taller buildings would be enabled.</p> <p>There is merit in having a policy that clearly articulates the building height hierarchy, with this hierarchy tied to proximity to commercial centres and the size / range of services provided in those centres.</p> <p>The requested amendments also reflect the Kāinga Ora position that Metropolitan Centres be employed within the centres hierarchy, as per the forward-looking aspects of the NPS-UD policies of 1, 3, and 6.</p> <p>These are sought to cover the existing key activity areas for Riccarton, Papanui, and Hornby. Furthermore, the higher density zoning around the city centre and metropolitan centres, are sought to extend</p>	<p>Delete policy and replace with the following:</p> <p>Enable building heights in accordance with the planned urban built character for medium and high density areas, whilst also enabling increased building heights under specific conditions.</p> <p><u>Encourage greater building height, bulk, form and appearance to achieve high density planned urban form when within the proximity of nearby commercial centres to deliver:</u></p> <p><u>a. At least 10 storey buildings within 1.2km of the Central City and the Metropolitan Centre zones in Hornby, Riccarton and Papanui;</u></p> <p><u>b. At least 6 storey buildings in proximity to town centres and medium and large local centres;</u></p> <p><u>c. At least 3-4 stories everywhere else in the MRZ.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				for 1.20 km, with a 400m Height Variation Overlay of 36m sought within 400m of the edge of these centres.	
56.	Residential	Policy 14.2.3.7 – management of increased building heights	Oppose	<p>The MDRS has the height rule as a restricted dictionary activity. MDRS Policy 5 explicitly seeks to ‘provide for developments not meeting permitted activity status, while encouraging high quality developments’.</p> <p>Taller buildings are therefore anticipated as being potentially appropriate subject to a site-specific assessment of effects. The policy needs to properly reflect that taller buildings are anticipated in appropriate locations and where the specific design properly manages the effects generated by the increase in height. As written this policy directly conflicts with Policy 5 of Sub clause 6 of Schedule 3A RMA.</p>	<p>Delete the policy and replace it with:</p> <p><u>Within medium and high density zoned areas, increased building heights are anticipated where:</u></p> <p>i. <u>The site has good accessibility to is public and active transport corridors, public open space, and a town or local commercial centre; and</u></p> <p>ii. <u>The design of the building appropriately manages potential shading, privacy, and visual dominance effects on the surrounding environment.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Taller residential buildings within 1.2km of the central city can only have a positive economic impact on the CBD by enabling more people to live within walking distance of the town centre. Given the large size of Christchurch, additional enablement of residential opportunities within 1.2km facilitates more people living near the centre i.e. it draws people in, rather than resulting in existing (or potential) CBD residents shifting out.	
57.	Residential	Policy 14.2.3.8 – fire fighting water capacity	Neutral		
58.	Residential	Objective 14.2.5 – high quality residential neighbourhoods	Support in Part	<p>Support the amendments to reference the planned urban character.</p> <p>References to ‘high’ quality in the title and the start of the objective will not always be appropriate or realistic. Use of language around ‘high standard’, ‘high level of amenity’, ‘spacious and</p>	<p>Amend the objective as follows:</p> <p>High Good quality, sustainable, residential neighbourhoods which are well designed, have a high level of amenity, enhance local character and reflect to reflect the planned urban character and the Ngāi Tahu heritage of Ōtautahi.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				attractive pedestrian circulation', 'high levels of glazing' can be used to set a bar that can be unrealistically high (or at least is very subjective). Kāinga Ora support high quality outcomes, however such language is subjective and is an easy stick that can be used by NIMBY opponents to higher density. Invariably multi-unit development involves the balancing of competing design outcomes (which are all perfectly valid), and it comes down to how these are balanced and prioritised – it often isn't possible to tick the optimal outcome across every matter.	
59.	Residential	Policy 14.2.5.1 – Neighbourhood character, amenity, and safety	Oppose	The matters subject to this policy are either captured in the MDRS policies which set the anticipated outcomes for MDRS, or are better articulated through proposed Policy 14.2.5.3 relating to	Delete policy.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>developments of 4 or more units.</p> <p>Policy direction for the remaining low density residential environments is provided through Policies 14.2.5.6-9.</p> <p>This policy therefore duplicates directions which are already better articulated elsewhere in the policy framework</p>	
60.	Residential	Policy 14.2.5.2 – high quality medium density residential developments	Support in Part	<p>Support the amendments to reference the planned urban character.</p> <p>References to ‘high’ quality in the title will not always be appropriate or realistic.</p>	<p>Amend policy as follows:</p> <p>14.2.5.2 Policy – High Good quality, medium density residential development</p> <p>Encourage innovative approaches to comprehensively designed, high good quality, medium density residential development, which is attractive to residents, responsive to housing demands, and provides a positive contribution to its environment (while acknowledging the need for increased densities and changes in residential</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>character) reflects the planned urban built character of an area, through:</p> <ul style="list-style-type: none"> i. consultative planning approaches to identifying particular areas for residential intensification and to defining high good quality, built and urban design outcomes for those areas; ii. encouraging and incentivising amalgamation and redevelopment across large-scale residential intensification areas; iii. providing design guidelines to assist developers to achieve high good quality, medium density development; iv. considering input from urban design experts into resource consent applications; v. promoting incorporation of low impact urban design elements, energy and water efficiency, and life-stage inclusive and adaptive design; and vi. recognising that built form standards may not always support the best design and efficient use of a site for medium density development, particularly for larger sites.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
61.	Residential	Policy 14.2.5.3 – quality large scale developments	Support in Part	<p>The policy is generally appropriate and captures the key design elements necessary to support the good design of more intensive residential complexes.</p> <p>As above, ‘good quality’ is considered to be a more appropriate term than ‘high quality’.</p>	<p>Amend the policy as follows:</p> <p>14.2.5.3 Policy – Good gQ quality large scale developments</p> <p>a. Residential developments of four or more residential units contribute to a high good quality residential environment through site layout, building and landscape design to achieve:</p> <ul style="list-style-type: none"> i. engagement with the street and other spaces; ii. minimisation of the visual bulk of buildings and provision of visual interest; iii. a high good level of internal and external residential amenity; iv. high good quality shared spaces, including communal living spaces and accessways that provide safe, direct access for pedestrians; v. a safe and secure environment; and

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					vi. public through connections for large sites with multiple public frontages.
62.	Residential	Policy 14.2.5.4 – On-site waste storage	Oppose	A policy is not necessary for this level of detail. The matters addressed by the policy are covered at an appropriate level in Policy 14.2.5.3 above.	Delete policy
63.	Residential	Policy 14.2.5.5 – Wind effects	Support in Part	While Kāinga Ora does not oppose the potential need for wind effects to be considered, the concern lays around appropriateness of Matters of Discretion, the proposed height limits triggering an assessment and technical expertise available to carry out these assessments or determine if assessments (or anticipated effects) are appropriate.	<ol style="list-style-type: none"> 1. Retain Policy 14.2.5.5, noting that Kāinga Ora has submitted on provisions relating to wind effects. 2. Move all provisions relating to wind to sit under the General Rules.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
64.	Residential	Objective 14.2.6 – Medium density residential zone	Oppose	The MDRS objective 2 and Policies 1-5 discussed above (objective 14.2.3 and associated policies 14.2.3.1-14.2.3.5) provide the policy framework for MDRS and as such this objective and associated policy are unnecessary	Delete the objective
65.	Residential	Policy 14.2.6.1 - MDRS	Oppose	As per comments on Objective 14.2.6	Delete the policy
66.	Residential	Policy 14.2.6.2 – local centre intensification precincts	Oppose	As discussed in the section on HRZ height limits, the proposed approach to heights and precincts is unnecessarily complicated. Local Centre Intensification Precincts are well-located for enabling more people to live in close proximity to a range of services. The area covered by this precinct is sought to be simply rezoned to HRZ, and as such this policy is no longer necessary and can be deleted.	<ol style="list-style-type: none"> 1. Delete the policy and associated Local Centre Intensification Precinct from the planning maps. 2. As sought elsewhere in this submission, rezone the land within the Local Centre intensification Precinct to HRZ.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
67.	Residential	Objective 14.2.7 and associated policies - HDRS	Neutral	It would thematically make more sense for these provisions to be located after the policies on MRZ, which would then lead into the policies on heights and design outcomes	Relocate the HRZ provisions so they are located after the suite of MRZ policies i.e. after Policy 14.2.3.5.
68.	Residential	Objective 14.2.7 and policies 14.2.7.1-14.2.7.3	Support	The objective and policies provide for higher density development in appropriate locations.	Retain the objective and policies.
69.	Residential	Policy 14.2.7.4 and Policy 14.2.7.5	Oppose	As set out elsewhere in this submission, the precinct approach is unnecessarily complicated. A simplified approach is sought through amendments to the HRZ height rules, with this rationalised approach to heights provided with appropriate policy support through Objective 14.2.7 and policies 14.2.7.1-14.2.7.3 (along with Policy 14.2.3.7 as sought to be amended above)	Delete the policies and the associated Large Local Centre Intensification Precincts and the High Density Residential Precincts.
70.	Residential	Policy 14.2.7.6 – High density development	Oppose	The requirement that sites be at least two stories in height may not be appropriate in a range of circumstances and is	Delete the policy.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>unnecessarily complex – there is significant theoretical capacity in these areas so maintaining design flexibility is more important than maintaining capacity.</p> <p>Whilst sites can be amalgamated, there is no requirement for amalgamation.</p> <p>It can be quite appropriate to locate building height and mass away from the road edge in high density environments, depending on site shape, size, orientation, and building design</p>	
71.	Residential	Objective 14.2.8 and policies 14.2.8.1 and 14.2.8.2 – Central City	Support	This Operative Plan objective and associated policies are proposed to be deleted in PC14. This deletion is supported as the policy direction is no longer appropriate, with the purpose of the HRZ near the central city better articulated through the proposed new replacement provisions in 14.2.8 and policies 14.2.8.1 and 14.2.8.2	Support the deletion of these provisions as shown in PC14 as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
72.	Residential	Objective 14.2.8 – Future urban zone Associated policies 14.2.8.1 to 14.2.8.7	Support in Part	<p>See comments elsewhere regarding zone labelling. The FUZ label has not been appropriately applied to existing greenfield urban zoned locations – existing urban zoned but unbuilt residential land are sought to be MRZ (unless appropriately justified QM apply). An example of just such an approach is the correct application of a HRZ around the emerging Halswell commercial centre where already zoned RNN land is yet to be built, but has a proposed HRZ applied. In the same way the balance of this RNN area is to have a MRZ applied rather than FUZ.</p> <p>Taking a consistent national view in the application of National Planning Standards, the FUZ zone label is only used in other District Plans for areas that are yet to have an operative urban zone. A FUZ is a 'holding zone' that identifies where medium to long term urban growth is anticipated.</p>	<ol style="list-style-type: none"> 1. Delete references to FUZ and relabel existing urban zoned but undeveloped residential land as MRZ (or HRZ if appropriately located proximate to a large commercial centre). 2. Retain the 14.2.8 section as it provides useful direction on how the build-out of greenfield residentially zoned areas is to occur. 3. Amend the objective as follows: 14.2.8 Objective – <u>Development of greenfield areas</u> Future Urban Zone Co-ordinated, sustainable and efficient use and development is enabled in the Future Urban Zone <u>greenfield growth areas</u>.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>The FUZ zone provisions are focussed on preventing rural activities from occurring that could prejudice future urbanisation e.g. quarries or intensive farming or lifestyle block subdivision. Invariably the plan frameworks require a further plan change process to be undertaken to activate or 'live zone' a residential zone that can then be developed.</p> <p>The associated policies that guide the build-out of greenfield areas remain appropriate.</p>	
73.	Residential	Policy 14.2.9.4 – Existing non-residential activities	Support in Part	<p>This existing Operative Plan policy has in practice created ambiguity when non-residential sites are proposed to be redeveloped for a different non-residential activity i.e. the reference to 'redevelopment' can be interpreted as only applying to the existing activity having new facilities, rather than enabling the site to be efficiently repurposed for a</p>	<p>Amend the policy as follows:</p> <p>Enable existing non-residential sites activities to continue to be used for a range of non-residential activities and support their redevelopment and expansion provided they do not:</p> <ul style="list-style-type: none"> i. have a significant adverse effect on the anticipated character and amenity of residential zones; or ii. are of a scale or activity that would undermine the role or

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>different type of non-residential activity.</p> <p>With neighbourhoods transitioning to medium density outcomes, it is important that residents have easy access to convenience retail and a range of community facilities. The adaption and repurposing of existing non-residential sites is a useful tool for enabling such provision as part of delivering good quality neighbourhoods.</p> <p>It is accepted that such changes need to be assessed on a case-by-case basis to ensure compatibility with a residential context, with the MRZ and HRZ description both anticipating that such zones will include compatible non-residential activities.</p>	<p><u>function of any nearby commercial centres. undermine the potential for residential development consistent with the zone descriptions in Table 14.2.1.1a.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
74.	Residential	Objective 14.2.12 and Policy 14.2.12.1 – compatibility with industrial activities	Oppose	<p>Kāinga Ora considers that at the interface of industrial and residential zones the onus for managing effects rest primarily with the industrial activity. The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p> <p>Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be appropriate with the benefits of the QM not outweighing the costs.</p>	Delete Objective 14.2.12 and Policy 14.2.12.1 and the Industrial Interface Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
75.	Residential	14.3 – how to apply the rules		Kāinga Ora notes that the relevant objectives and policies are still provided for within the Plan and therefore questions the relevance of these if the Community Housing redevelopment mechanism has been deleted.	<p>Consistent with this submission, Kāinga Ora supports the deletion of the Community Housing Redevelopment Mechanism, provided Plan Change 14 is amended consistent with the relief sought in this submission.</p> <p>Kāinga Ora notes that the relevant objectives and policies are still provided for within the Plan and therefore questions the relevance of these if the Community Housing redevelopment mechanism has been deleted.</p>
14.3 How to interpret and apply the rules					
76.	Residential	14.3 How to interpret and apply the rules – Clause f. xvi.	Oppose	The proposed deletion is consequential to the deletion of the Airport Noise Influence Area qualifying matter, amongst others deleted here and throughout the body of this submission.	<p>f. There are parts of residential zones where the permitted development, height and/or density directed by the MDRS or Policy 3 of the NPS-UD may be modified by qualifying matters. These are identified in detail in Chapter 6.1A and the Planning Maps, and include the following:</p> <p>i. Historic Heritage including heritage items, heritage settings, Residential</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>Heritage Area, Residential Heritage Area Interface</p> <p>ii. Riccarton Bush Interface Area</p> <p>iii. Heritage, Significant and other Trees</p> <p>iv. Sites of Ecological Significance</p> <p>v. Outstanding Natural Features and Landscapes</p> <p>vi. Sites of Cultural Significance</p> <p>vii. Residential Character Areas</p> <p>viii. High Flood Hazard Management Area</p> <p>ix. Flood Ponding Management Area</p> <p>x. Coastal Hazard High Risk Management Area and Coastal Hazard Medium Risk Management Area</p> <p>xi. Tsunami Management Area</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					xii. Slope Hazard xiii. Waterbody Setback xiv. Railway Building Setback xv. Electricity Transmission Corridor and Infrastructure xvi. Airport Noise Influence Area xvii. Waste Water Constraint Area xviii. Lyttelton Port Influence Area xix. Low Public Transport Accessibility Area xx. City Spine Transport Corridor xxi. Industrial Interface
14.4 Residential Suburban and RSDT Zone rules					
77.	Residential	14.4.2.2 – Tree and garden planting	Oppose	The proposed amendments to this rule duplicate and confuse the regulatory framework with	Delete the proposed amendments and retain the Operative Plan rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>the tree FC rule – essentially it introduces two rules to control the same matter.</p> <p>Kāinga Ora oppose the tree FC rule and this rule amendment for the reasons given in the submission on the tree FC rule.</p> <p>In the event that the tree FC rule is retained, this rule is sought to simply have an advice note directing Plan users to the FC rule and the additional tree canopy outcomes sought in that separate rule.</p>	
78.	Residential	14.4.2.3 - height	Oppose	<p>This rule introduces an 8m height limit if you're in the Riccarton Bush QM and under the Airport Noise Influence Area (which is why it has a RS zoning rather than MRZ).</p> <p>Kāinga Ora have opposed before the extent of the Airport Noise Influence Area and the Riccarton Bush QM and have sought the area around</p>	<ol style="list-style-type: none"> 1. Delete 8m Riccarton Bush height limit. 2. Delete 7m height rule in the Industrial Interface Qualifying matter area and apply relevant MRZ or HRZ heights.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Riccarton Bush is MRZ to the north and HRZ to the south, as such there is no need for an 8m height limit in the RS zone.</p> <p>Separately the height rule also introduces a 7m height limit in the industrial interface QM – which given that this is a rule being applied to the RS and RSDT zones this duplicates an existing situation. Kāinga Ora supports the deletion of this rule and application of relevant MRZ or HRZ zones and heights.</p>	
14.5 Medium Density Zone Rules					
79.	Residential	All controlled and RD rules re notification statements		<p>Consistent logic needs to be applied to the notification statements as follows:</p> <p>If the rule controls an internal occupant amenity matter or general street-scape outcomes then rule breaches should be non-notified as it is only the</p>	<p>1. Amend notification statements in both activity and built form rules to align with this logic.</p> <p>Non-notified:</p> <p>14.5.1.3 (RD1) – four or more units</p> <p>14.5.2.2 – landscaping</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>occupant who is affected or passers-by;</p> <p>If the rule it controls a neighbouring site interface matter then it should be open to an assessment re limited notification but should not be publicly notified. Ltd but not full;</p> <p>If it rule controls a matter that could impact on urban form at a neighbourhood scale e.g. height, then it should be open to a full s95 assessment.</p>	<p>14.5.2.5 – Outdoor Living Space</p> <p>14.5.2.8 – Outlook space</p> <p>14.5.2.9 – Fencing</p> <p>14.5.2.10 – Windows to street</p> <p>14.5.2.11 – Minimum unit size</p> <p>14.5.2.12 – Ground floor habitable space</p> <p>14.5.2.13 – Service and storage space</p> <p>14.5.2.15 – Garage and carports</p> <p>14.5.2.16 – Building reflectivity</p> <p>14.5.2.16 – mechanical ventilation</p> <p>14.5.2.18 – Spine road setbacks</p> <p>Open to limited but not public notification:</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
80.	Residential	Assessment matters	Oppose	The proposed assessment matters for both the '4 or more units' urban design rule and the built form rules are excessive and overlapping. Kāinga Ora seek that they are simplified and consolidated.	<ol style="list-style-type: none"> 1. For the 'non-notified' rules set out above, the matters for assessment are to be limited to the adequate provision of amenity for occupants and the delivery of a functional and attractive streetscape. 2. For the rules that potentially affect neighbouring sites set out above, additional matters relating to consideration of the amenity of neighbouring sites are appropriate. 3. For height, additional matters relating to urban form and proximity to services and public and active transport modes are appropriate, along with consideration of wind effects for buildings over 22m in height. 4. For the 4+ unit urban design rule, matters of discretion are sought to be as follows: <ol style="list-style-type: none"> a) <u>Whether the design of the development is in keeping with, or complements, the scale and character of development anticipated for the surrounding area and relevant significant natural, heritage and cultural features.</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>b) <u>The relationship of the development with adjoining streets or public open spaces including the provision of landscaping, and the orientation of glazing and pedestrian entrances;</u></p> <p>c) <u>Privacy and overlooking within the development and on adjoining sites, including the orientation of habitable room windows and balconies;</u></p> <p>d) <u>The provision of adequate outdoor living spaces, outdoor service spaces, waste and recycling bin storage including the management of amenity effects of these on occupants and adjacent streets or public open spaces;</u></p> <p><u>Where on-site car parking is provided, the design and location of car parking (including garaging) as viewed from streets or public open spaces</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
81.	Residential	14.5.1(P1) – Residential activity	support	<p>The proposed amendment to P1 to delete the limit on units with more than 6 bedrooms is supported. The definition of 'residential activity' includes emergency and refuge housing, and sheltered housing and so the amendment better enables such facilities to be established in the MRZ as a permitted activity where they provide accommodation for more than 6 residents.</p> <p>It is noted that boarding houses, student hostels, and retirement villages are separately defined and managed through separate rules.</p>	Retain rule as proposed.
82.	Residential	14.5.1(P3) – Elderly Persons Housing	Support in Part	Need to clarify – the Operative Plan P3 provides a permitted pathway for the conversion of Elderly Persons Housing to general tenure as a permitted activity. The provision of such a pathway is supported. PC14	<p>Either:</p> <ol style="list-style-type: none"> 1. Reinstate P3 so there is a clear permitted pathway; or 2. Include an advice note under P1 as follows:

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>proposes to delete this pathway.</p> <p>The PC14 amendment is ambiguous as to whether the deletion of P3 means that conversion of EPH is no longer permitted, OR is it proposed to be deleted because there is now no such thing as an EPH because MDRS now enables multi-units so it is now implicit that you can convert existing EPH as such conversion would simply fall within the ambit of P1?</p> <p>Given the number of EPH in the City it is important that there is an unambiguous position on how their conversion is to be treated.</p>	<p><u>Conversion of existing Elderly Persons Housing is permitted under P1.</u></p>
83.	Residential	Controlled		<p>PC14 deletes existing rules controlling non-compliance with tree and garden planting, ground floor habitable space, and service spaces. These are all existing Operative Plan rules rather than MDRS rules. Given</p>	<p>Retain controlled activity status Rule 14.5.1.2.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				that they are being retained as built form standards (apart from the overhang rule), the existing controlled activity status are sought to also be retained.	
84.		RD1 – urban design assessment	Support	Support retention of non-notified clause	Retain as notified
85.		RD27 – wind assessment	Oppose	<p>While Kāinga Ora does not oppose the potential need for wind assessments on tall buildings (above 6 storey), the concern lays around appropriateness of Matters of Discretion, the proposed height limits triggering an assessment and technical expertise available to carry out these assessments or determine if assessments (or anticipated effects) are appropriate.</p> <p>Kāinga Ora seeks that the rule provide a permitted pathway. Buildings may separately breach height rules but that is a separate matter (just as they will also invariably require</p>	<ol style="list-style-type: none"> 1. Delete the rule. 2. As an alternative relief in the event that a regulatory approach to wind modelling is retained, redraft the rule to provide for a permitted pathway (for wind effects) where compliance with the specified performance standards is met. 3. Kāinga Ora seeks that the provisions relating to wind effects are moved to sit under the General Rules.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				consent under RD2 for more than 3 units).	
86.		D11 – industrial interface QM	Oppose	<p>Kāinga Ora considers that at the interface of industrial and residential zones the onus for managing effects rest primarily with the industrial activity. The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p> <p>Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be appropriate with the benefits of</p>	Delete the Industrial Interface Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				the QM not outweighing the costs.	
87.		14.5.2.1 – servicing advice note	Support in Part	<p>Servicing constraints mean that whilst resource consent could be granted, Building Consent could be declined if services are not available. Infrastructure constraints need to be readily searchable via on-line tool that can be readily updated, given that CCC presumably know where capacity limits are.</p> <p>The general onus is on Council to address constraints within Council-controlled networks via LTP and DC processes to enable MDRS.</p>	<ol style="list-style-type: none"> 1. Retain the advice note. 2. Kāinga Ora seek that Council investigate the provision of an on-line publicly searchable tool to enable timely identification of site constraints.
88.		14.5.2.2 – Landscaping and tree canopy	Oppose	In accordance with our submission seeking deletion of the tree canopy financial contribution rule, the landscaping and tree canopy rule is sought to be deleted and	<p>Delete rule and replace with the following:</p> <p><u>14.5.2.2 landscaped area.</u></p> <p><u>(1) A residential unit at ground floor level must have a landscaped area of a minimum of 20% of a developed site</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>replaced with the MDRS standard.</p> <p>An additional clause is proposed for non-residential activities that aligns with the MDRS outcomes.</p>	<p><u>with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p> <p><u>2. The landscaped area may be located on any part of the development site, and does not need to be associated with each residential unit.</u></p> <p><u>3. Non-residential activities must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p>
89.		14.5.2.3(i)a - Height	Support	Rule implements MDRS as per Schedule 3A	Retain rule as notified
90.		14.5.2.3(i)b – Height in local centre intensification precincts	Oppose	<p>The Local Centre Intensification Precincts are all located in close proximity to large suburban commercial centres such as Barrington and Bishopdale Malls. These areas are well placed to be HRZ.</p> <p>The areas within this precinct are sought to be rezoned to</p>	Delete clause.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				HRZ and therefore this clause can be deleted.	
91.		14.5.2.3(iv) Industrial interface and (v) Riccarton Bush	Oppose	<p>Kāinga Ora considers that at the interface of industrial and residential zones the onus for managing effects rest primarily with the industrial activity. The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p> <p>Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be</p>	Delete 14.5.2.3(iv) and 14.5.2.3(v).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>appropriate with the benefits of the QM not outweighing the costs.</p> <p>The area around Riccarton Bush is ideally located for supporting a High Density Residential Zone given its close proximity to a large town centre, cycleways, high frequency bus routes, and the large university activity hub</p>	
92.		14.5.2.4 – Building Coverage	Support in Part	<p>The rule implements MDRS as per Schedule 3A.</p> <p>Kāinga Ora support additional exemptions for eaves and guttering, although it is sought that this be extended to 600mm which is a standard eave depth and better provides for weather tightness design solutions. Eaves do not have a significant impact on visual dominance, and setbacks from neighbours are controlled through separate</p>	<p>Amend rule as follows:</p> <ul style="list-style-type: none"> a. The maximum building coverage must not exceed 50% of the net site area. b. ... c. <u>Eaves and roof overhangs up to 300mm 600mm in width and guttering up to 200mm in width form the wall of a building shall not be included in the building coverage calculation.</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				rules on internal setbacks and height-to-boundary.	
93.		14.5.2.5 – Outdoor living space	Support	The rule implements MDRS as per Schedule 3A	Retain rule as notified.
94.		14.5.2.6 – Height to boundary	Oppose	The provision as proposed is inconsistent with the MDRS.	Delete and replace with MDRS provision.
95.		14.5.2.7 – Building setbacks	Support in Part	<p>Support clauses (a)(i) and (ii) as implements MDRS as per Schedule 3A.</p> <p>Support clause (iii) enabling eaves and gutters to project into the road boundary setback. Extend the eave exemption to 600mm to align with standard building practice, along with enabling deeper porches which have a strong functional benefit. Such projections have a minimal impact on streetscape amenity and can have benefits through providing greater</p>	<p>1. Retain clause (a)(i) and (ii) as notified.</p> <p>2. Amend clause(a)(iii) as follows:</p> <p>Only road boundary: Eaves, and roof overhangs, and porches to a maximum of 300mm 600mm in width measured from the wall of a building and guttering up to 200mm in width.</p> <p>3. Amend clause (a)(iv) as follows:</p> <p>All other accessory buildings or garages, including garages that internally access a residential unit.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
				<p>articulation in the street-facing facade.</p> <p>Clause (iv) – support reduction in setbacks for accessory buildings, subject to the limitations to height and length in the rule. A grammatical amendment would be helpful to clarify that accessory buildings do not need to have internal access to the dwelling</p>							
96.		14.5.2.8 – Outlook space	Support	The rule implements MDRS as per Schedule 3A. The minor amendment to clause (i)(i) is supported.	Retain the rule as notified.						
97.		14.5.2.9 - Fencing	Support in Part	<p>Support 2m height limit on internal boundary fencing.</p> <p>The proposed rules will result in a significant loss of occupant amenity where outdoor living is located between the unit and the street. Whilst such a layout is not generally preferred, for east-west streets, the units on the southern side of the street</p>	<p>Retain clause (iii) as notified.</p> <p>Delete clauses (i) and (ii) and replace with the following (Operative Plan rule and associated diagrams reinstated):</p> <table><tr><td></td><td>Fence type</td><td>standard</td></tr><tr><td>i</td><td>Where at least 50% of the fence structure is</td><td>1.8m</td></tr></table>		Fence type	standard	i	Where at least 50% of the fence structure is	1.8m
	Fence type	standard									
i	Where at least 50% of the fence structure is	1.8m									

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
				<p>will face north where it can often result in good design outcomes for the outdoor living to be located between the unit and the street to take advantage of the northern orientation.</p> <p>Retain the Operative Plan rules on road frontage fencing which are well understood by the design community and achieve an appropriate balance in occupant amenity and streetscape outcomes.</p>	<table><tr><td></td><td><u>visually transparent</u></td><td></td></tr><tr><td><u>ii</u></td><td><u>Where less than 50% of the fence structure is visually transparent</u></td><td><u>1.2m</u></td></tr></table>		<u>visually transparent</u>		<u>ii</u>	<u>Where less than 50% of the fence structure is visually transparent</u>	<u>1.2m</u>
	<u>visually transparent</u>										
<u>ii</u>	<u>Where less than 50% of the fence structure is visually transparent</u>	<u>1.2m</u>									
98.		14.5.2.10 – Windows to the street	Support in Part	<p>Clause (a) of the rule implements MDRS as per Schedule 3A.</p> <p>Clause (b) re excluding gables is supported.</p> <p>Clause (c) relating to units with large streetscene setbacks is also supported as the large setbacks mean that the streetscene outcomes sought by the rule are less relevant.</p>	<p>1. Retain clauses (a)-(d) as notified.</p> <p>2. Delete clause (e).</p>						

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Clause (d) to incentivise front doors and their contribution towards an attractive street façade is supported.</p> <p>Clause (e), whilst trying to be enabling, adds considerable (and unnecessary) complexity to the rule for little gain.</p>	
99.		14.5.2.11 – Minimum unit size	Support	No amendments are proposed to the Operative Plan rule on minimum unit sizes. This rule is well-established and appears to be working well.	Retain rule as notified.
100.		14.5.2.12 – Ground floor habitable room	Support in Part	<p>The Operative Plan includes a rule controlling ground floor habitable rooms which is well-established and appears to be working well.</p> <p>There are two key design outcomes sought, namely 1) the ground floor on the road frontage is habitable space rather than garaging in order to deliver positive streetscape outcomes; and 2) that at least 50% of the ground floor across</p>	<p>Amend the rule as follows:</p> <p>a. Any building that includes a residential unit shall:</p> <p>i. Where the residential unit fronts a road or public open space, unless built over a separate ground floor residential unit, have a habitable room located at ground floor level with a minimum internal dimension of 3 metres; and</p> <p>ii. Any residential unit shall have at least 50% of any ground floor area as habitable rooms.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>the site is habitable space, to avoid the ground floor of complexes being overly dominated by garaging and undercroft parking areas.</p> <p>The proposed rule is sought to be amended to better articulate these two outcomes and to avoid developments arranged as horizontally stacked low-rise apartments being unnecessarily penalised through a requirement for every unit to individually have ground floor space.</p> <p>As all MRZ now has a height limit of 11m or more, clause (b) requires amendment, noting that the outcomes of 50% habitable remains as a valid outcome for the small areas of MRZ that have a height of less than 11m through QMs.</p>	<p>a. <u>Where a residential unit fronts a road or public open space, it shall have a habitable room with a minimum internal dimension of 3 metres located at the ground floor level facing the frontage. This rule does not apply to upper-level units that are built over a separate ground floor residential unit; and</u></p> <p>b. <u>Where the permitted height limit is over 11m (refer to Rule 14.5.2.3),</u> a minimum of 50% of the ground floor area <u>across the site</u> shall be occupied by habitable spaces and/or indoor communal living space. This area may include pedestrian access to lifts, stairs, and foyers.</p> <p>c. This rule does not apply to residential units in a retirement village.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
101.		14.5.2.13 - storage	Support in Part	<p>The requirement for outdoor storage for bins and washing lines is an Operative Plan rule that appears to be working well.</p> <p>Clause (a) relating to outdoor storage is supported, although may be an unnecessary level of regulation if this matter is adequately covered by urban design assessment matters.</p> <p>Clause (b) is a new rule in PC14. It requires a minimum amount of internal storage to be provided. Whilst internal storage spaces are useful, this rule is considered to be an unnecessary level of regulation.</p> <p>It is noted that clause (a) only applies to 4 or more units, while clause (b) applies to all units i.e. it is unclear what the rationale is behind the different number of units that trigger the clauses.</p>	<ol style="list-style-type: none"> 1. Retain clause (a). 2. Delete clause (b). 3. Alternatively storage could be addressed as an assessment matter for developments of 4 or more units.
102.		14.5.2.14 – Water supply for fire fighting	Neutral		

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
103.		14.5.2.15 – Garage location	Support in Part	<p>The location of car parking can have a significant impact on streetscape quality. A requirement to recess garaging or carports behind the front building line is supported.</p> <p>It is noted that this rule is only triggered where there are 4 or more units. It also does not apply to surface car parking areas which can also have a significant adverse effect on streetscape. Recessing is only required along the street frontage i.e. the rule must not apply to the front face of units located internally within a site.</p>	<p>Amend the rule as follows:</p> <p>14.5.2.15 garaging and carport building and parking area location</p> <p><u>When developing four or more residential units on a single site, where a residential unit fronts towards a road, any garage, or carport shall be located at least 1.2 metres behind the front façade of a residential unit.</u></p>
104.		14.5.2.16 – Building reflectivity; and RD29	Oppose	<p>New rule that applies to the Residential Hills Precinct – Christchurch as had residential hill suburbs for over 100 years and these areas have not given rise to excessive glare issues from dwellings. Whilst rules controlling reflectivity can be appropriate in rural ONLs where the key outcome is to minimise the visibility of</p>	Delete rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>structures, such an outcome is not appropriate in residential suburbs where housing is an inherent part of the landscape.</p> <p>Requiring low light reflectance values means that buildings have to be finished in dark colours which can exacerbate urban heat island effects and require increased use of air conditioning to reduce unit heating in summer.</p>	
105.		<p>14.5.2.17 – Location of outdoor mechanical ventilation;</p> <p>And RD30</p>	Oppose	<p>New rule that requires a 3m setback if at ground level between a residential unit and the road or a shared accessway. Presumably it is visual effects that are the concern.</p> <p>The rule constitutes a level of design detail that is unnecessary to regulate. If mounted at ground level then even a short 1.2m high fence is sufficient to visually screen in a</p>	Delete the rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>similar manner to the proposed rule on bin storage.</p> <p>As drafted the rule applies to mechanical units on the ground, whereas they would be permitted if wall-mounted despite having a worse visual outcome. It also applies to mechanical units located adjacent to internal boundaries where the property next door (over the fence) has an accessway.</p>	
106.		14.5.2.18 – Spine Road setbacks	Oppose	<p>The new rule requires buildings and outdoor living spaces to be set back 4m from spine road corridors (where the corridor is less than 24m in width, which is the majority of the corridor given 20m road reserves are typical).</p> <p>It is understood that the intention of the rule is to enable road widening in the future to accommodate public rapid transit. If Council's intention is to acquire land in the future to</p>	<ol style="list-style-type: none"> 1. Delete the rule. 2. If land acquisition for public works is the intent, then Council should initiate a Notice of Requirement to designate the corridor.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>facilitate public works then it should use the designation powers available to it.</p> <p>Given the highly developed nature of these existing corridors with lengthy sections of commercial property built to the road boundary, it is unclear how any corridor-long road widening will occur without major land acquisition and demolition.</p>	
High Density Residential Zone					
107.		Controlled and Restricted Discretionary notification statements	Support in Part	<p>Consistent logic needs to be applied to the notification statements as follows:</p> <p>If the rule controls an internal occupant amenity matter or general street-scape outcomes then rule breaches are sought to be non-notified as it is only the occupant who is affected or passers-by;</p>	<p>Amend notification statements in both activity and built form rules to align with this logic.</p> <p>Non-notified:</p> <p>14.6.1.3 (RD2) – four or more units</p> <p>14.6.2.7 – landscaping</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>If the rule it controls a neighbouring site interface matter then it should be open to an assessment re limited notification but should not be publicly notified. Ltd but not full;</p> <p>If it rule controls a matter that could impact on urban form at a neighbourhood scale e.g. height, then it should be open to a full s95 assessment.</p>	<p>14.6.2.10 – Outdoor Living Space</p> <p>14.6.2.4 – Outlook space</p> <p>14.6.2.5 – Building separation</p> <p>14.6.2.6 – Fencing</p> <p>14.6.2.8 – Windows to street</p> <p>14.6.2.16 – Minimum unit size</p> <p>14.6.2.9 – Ground floor habitable space</p> <p>14.6.2.11 – Service and storage space</p> <p>14.6.2.14 – Garage and carports</p> <p>14.6.2.15 – mechanical ventilation</p> <p>14.6.2.17 – Spine road setbacks</p> <p>Open to limited but not public notification:</p> <p>14.6.2.12 – Building coverage</p> <p>14.6.2.2 – height to boundary</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					14.6.2.3 – internal boundary setbacks 14.6.2.13 – Water for Firefighting (FENZ only) Open to full s95 assessment: 14.6.2.1 – height
108.		Assessment matters	Oppose	The proposed assessment matters for both the '4 or more units' urban design rule and the built form rules are excessive and overlapping. Kāinga Ora seeks that they be simplified and consolidated.	<ol style="list-style-type: none"> 1. For the 'non-notified' rules set out above, the matters for assessment are sought to be limited to the adequate provision of amenity for occupants and the delivery of a functional and attractive streetscape. 2. For the rules that potentially affect neighbouring sites set out above, additional matters relating to consideration of the amenity of neighbouring sites are appropriate. 3. For height, additional matters relating to urban form and proximity to services and public and active transport modes are appropriate, along with consideration of wind effects for buildings over 22m in height.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>4. For the 4+ unit urban design rule, matters of discretion are sought to be as follows:</p> <p>e) <u>Whether the design of the development is in keeping with, or complements, the scale and character of development anticipated for the surrounding area and relevant significant natural, heritage and cultural features.</u></p> <p>f) <u>The relationship of the development with adjoining streets or public open spaces including the provision of landscaping, and the orientation of glazing and pedestrian entrances;</u></p> <p>g) <u>Privacy and overlooking within the development and on adjoining sites, including the orientation of habitable room windows and balconies;</u></p> <p>h) <u>The provision of adequate outdoor living spaces, outdoor</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p><u>service spaces, waste and recycling bin storage including the management of amenity effects of these on occupants and adjacent streets or public open spaces;</u></p> <p>i) <u>Where on-site car parking is provided, the design and location of car parking (including garaging) as viewed from streets or public open spaces.</u></p>
109.		RD2 and RD6 – urban design	Support in Part	<p>RD2 is the Operative Plan rule that requires an urban design assessment for more than 3 units. Clause (a)(i) of the rule implements MDRS as per Schedule 3A.</p> <p>Clause (a)(ii) and (iii) are unnecessary as the assessment of projects that do not comply with garage location and ground floor habitable space are addressed through proposed rule RD20.</p>	<p>Retain clauses (a)(i) and (b)</p> <p>Delete clauses (a)(ii) and (iii).</p> <p>Delete rule RD6</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Given that the purpose of this rule is to enable an urban design assessment, rather than consideration of any built form rule breaches, the retention of the clause (b) 'not limited or publicly notified' clause is supported.</p> <p>Proposed RD6 simply duplicates the assessment required under RD2(a)(i) and therefore is unnecessary and is sought to be deleted.</p>	
110.		RD7 and RD 8 – building heights 14.6.2.1 - Height	Oppose	<p>The approach to managing height is unnecessarily over-complicated and seeks to introduce additional built form rules relating to outdoor living space and internal boundary setbacks as an activity standard.</p> <p>Kāinga Ora seek that the Plan be simplified so that the MRZ has a single height limit rule as per the MDRS (subject to QMs). What is currently the MDRS Local Centre</p>	<ol style="list-style-type: none"> 1. Delete these two activity rules. Replace with: <u>Buildings that do not meet Rule 14.6.2.1 Building Height.</u> 2. Retain matter of discretion reference to 'Impacts on neighbouring property – Rule 14.15.3a'. 3. Delete references to: Town Centre Intensification Precinct; and replace with 'Height Variation Overlay'.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Intensification Precinct is sought to be rezoned to HRZ.</p> <p>The HRZ is sought to have two height limit areas – a 22m limit for the majority of the area taking in what are currently the MRZ Local intensification precinct, and the Large Local Centre Intensification Precinct. The extent of the HRZ is proportionate to the size of the centre so large centres support a greater walkable catchment. But the height enabled in the HRZ remains the same at 22m.</p> <p>HRZ is sought 0-1.20km from the edge of the MCZ and the CCZ.</p> <p>A 36m 'Height Variation Control' is sought to apply 0-400m from the edge of the Metropolitan Centre Zone (as sought within this submission) (Riccarton, Hornby and Papanui centres).</p>	<p>4. Subject to the relief sought above, further consequential changes may be necessary to fully incorporate the effects of the zone changes discussed in the reason related to Metropolitan Centres.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>A 36m 'Height Variation Control' is sought to replace the High Density Residential Precinct and 0-400m from the edge of the CCZ.</p> <p>Rules controlling boundary setback, height to boundary, outdoor living space, and landscaping are all covered by other built form rules. The PC14 height to boundary rule requires at least a 6m setback from boundaries for buildings over 12m.</p> <p>Tall buildings are anticipated in the HRZ and therefore are sought to be permitted up to the height limit. Such buildings will remain subject to an assessment of qualitative urban design outcomes as covered by the urban design assessment matters for 4+ units.</p> <p>Buildings that exceed the height limits are RD, and subject to additional assessment of the</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				built form matters of discretion for height breaches.	
111.	Residential	14.6.1.3 RD13	Oppose	In accordance with our submission seeking deletion of the tree canopy financial contribution rule, the landscaping and tree canopy rule is sought to be deleted and replaced with the MDRS standard.	Delete the rule.
112.		RD17	Support in Part	<p>While Kāinga Ora does not oppose the potential need for wind assessments on tall buildings (above 6 storey), the concern lays around appropriateness of Matters of Discretion, the proposed height limits triggering an assessment and technical expertise available to carry out these assessments or determine if assessments (or anticipated effects) are appropriate.</p> <p>The rule should provide a permitted pathway. Buildings may separately breach height</p>	<ol style="list-style-type: none"> 1. Delete the rule. 2. As an alternative relief in the event that a regulatory approach to wind modelling is retained, redraft the rule to provide for a permitted pathway (for wind effects) where compliance with the specified performance standards is met. 3. Kāinga Ora seek that the provisions relating to wind effects are relocated to within the General Rules.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				rules but that is a separate matter (just as they will also invariably require consent under RD2 for more than 3 units).	
113.		D1 and NC1 –education, spiritual, heath, pre-school activities	Support in Part	<p>The Operative Plan has restrictive rules controlling non-residential activities within the City Centre (Four Avenues) due to historic pressure to develop such areas for non-residential use.</p> <p>The HRZ now extends much further than the City Centre, however the restrictive ‘4 Aves’ rules have been carried over so they now apply throughout the HRZ.</p> <p>The HRZ includes areas in close proximity to the larger commercial centres where the provision of a range of community facilities is very appropriate and has long been anticipated and provided for in the District Plan. Easy accessibility to such services</p>	<ol style="list-style-type: none"> 1. Retain Rule D1 for education, spiritual, heath, pre-school activities located inside the Four Avenues. 2. Adopt the MRZ provisions/ activity status for such activities located in the HRZ outside the Four Avenues.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>and facilities is likewise a key element in delivering well-functioning urban environments and good quality high density residential neighbourhoods.</p> <p>Whilst retention of the existing restrictive approach to such facilities inside the Four Avenues may be appropriate, the existing framework in the Residential Medium Density Zone is considered to be more appropriate for the HRZ areas outside of the Four Avenues.</p>	
114.		Add new provisions for retail, office, and commercial service activity on the ground floor of apartment buildings		<p>It is common for apartment buildings to contain a small-scale commercial activity on the ground floor, often adjacent to the entrance foyer and as a means of buffering residential activity from what can be busy frontage roads. The provision of such services can likewise have significant convenience benefits for residents and is consistent with a good quality, high density neighbourhood. The ability to provide shared workspaces in</p>	<p>Add a new restricted discretionary and fully discretionary rule as follows:</p> <p><u>Retail, office, and commercial service activity</u></p> <p><u>a. Activity status: Restricted Discretionary</u></p> <p><u>Where:</u></p> <p><u>i. The retail, office, or commercial service activity is limited to the</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				apartment buildings is consistent with emerging remote working trends where people still seek companionship during the day whilst working remotely from their employer. Provided the scale of non-residential facilities is limited there is minimal potential for such to undermine the role and function of nearby commercial centres which typically cover several hectares.	<p><u>ground floor tenancy of an apartment building;</u></p> <p><u>ii. The gross floor area of the activity/activities does not exceed 200m²; and</u></p> <p><u>iii. The hours of operation are between:</u></p> <p><u>i. 7.00am and 9.00pm Monday to Friday; and</u></p> <p><u>ii. 8.00am and 7.00pm Saturday, Sunday, and public holidays.</u></p> <p><u>The Council's discretion shall be limited to the following matters:</u></p> <p><u>a. The design, appearance and siting of the activity;</u></p> <p><u>b. Noise and illumination;</u></p> <p><u>c. Signage.</u></p> <p><u>2. Activity status: Discretionary</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<u>Where compliance is not achieved with the matters specified in HRZ-RX(a)(i), (ii) and/or (iii).</u>
115.		14.6.2 – Built form standards note	Oppose	<p>The built form rules start with a new note that the standards apply “to all permitted activities and restricted discretionary RD2” i.e. 3+ units.</p> <p>This note is ambiguous as it implies that the built form standards do not apply to any non-residential activities or activities that breach other RD, D or NC rules.</p> <p>It is questionable whether the note is necessary, but if it is to be retained it would be better placed in the ‘how to use the rules’ section. Kāinga Ora seek that it simply state that in addition to being subject to the activity standards, all buildings are also subject to the built form rules.</p>	<p>1. Delete the note. 2. As an alternative relief, if the note is to be retained, then relocate it to the ‘how to use the rules’ section 14.3 as follows:</p> <p><u>In addition to being subject to the activity standards, all buildings are also subject to the built form standards.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
116.		14.6.2.1 - Height	Support in Part	See discussion under RD7 and RD8 above.	Amend clause (a) of the rule as follows: a. Buildings must not exceed 14.22 metres in height above ground level; b. <u>Buildings located in the Height Variation Control overlay must not exceed 36 metres in height above ground level;</u>
117.		14.6.2.2 – Height to boundary	Support in Part	Kāinga Ora supports the encouragement of perimeter block development and building mass at front edge. However there is some concern over if the 20m, or 60% element of the provision is appropriate. For example, the 20m length should be increased to better align with standard block sizes in the High Density Zone. Kāinga Ora is also concerned, while the intent of the rule will achieve desired development outcomes, its drafting could be simplified.	Redraft provisions to improve clarity for plan users and ensure that dimensions referred to in the provision reflects block sizes within the High Density Zone.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
118.		14.6.2.3 - Setbacks	Support in Part	<p>Support clauses (a) and (b)(i) as implements MDRS as per Schedule 3A.</p> <p>Support clause (b)(ii) – support reduction in setbacks for accessory buildings, subject to the limitations to height and length in the rule. A grammatical amendment would be helpful to clarify that accessory buildings do not need to have internal access to the dwelling.</p> <p>Support clause (b)(iii) enabling eaves and gutters to project into the road boundary setback. Extend the eave exemption to 600mm to align with standard building practice, along with enabling deeper porches which have a strong functional benefit. Such projections have a minimal impact on streetscape amenity and can have benefits through providing greater articulation in the street-facing facade.</p>	<p>Retain clause (a) and (b)(i) as notified.</p> <p>Amend clause (b)(ii) and (iii) as follows:</p> <p>(b) This standard does not apply to site boundaries:</p> <p>(i)...</p> <p>(ii) side and rear setbacks: for accessory buildings or garages, including garages that internally access a residential unit, where the accessory building or garage is less than 3 metres in height and the total length of the building does not exceed 10.1m; and</p> <p>(iii) front boundary setbacks: where eaves, and roof overhangs, and porches up to 300mm 600mm in width and guttering up to 200mm in width from the wall of a building intrude into the boundary setback.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
119.		14.6.2.4 - Outlook Space	Support	Support as implements MDRS as per Schedule 3A. Minor amendment to clarify clause (i) is also supported.	Retain rule as notified
120.		14.6.2.5 – Building separation	Support in Part	<p>It is understood that the intent of the rule is to manage built form within the site i.e. the rule is to ensure separation between two towers on the same site, rather than provide separation with buildings on neighbouring sites (as separation to neighbours is managed through a combination of height to boundary, internal boundary setbacks and outlook space rules).</p> <p>The outcome of having reasonable space between taller built elements on the same site is supported, subject to the rule being amended to make its application clear.</p> <p>The other option is to delete the rule and rely on separation being addressed in part through the outlook space rule, plus</p>	<p>Delete the rule and replace as follows:</p> <p><u>Any parts of a building located more than 12m above ground level shall be separated by at least 10m from any other buildings on the same site that are also located more than 12m above ground level.</u></p> <p><u>Or alternatively, delete the rule entirely.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought									
				urban design assessment matters, and therefore this rule is unnecessary.										
121.		14.6.2.6 - Fencing	Support in Part	<p>Support 2m height limit on internal boundary fencing.</p> <p>The proposed rules will result in a significant loss of occupant amenity where outdoor living is located between the unit and the street. Whilst such a layout is not generally preferred, for east-west streets, the units on the southern side of the street will face north where it can often result in good design outcomes for the outdoor living to be located between the unit and the street to take advantage of the northern orientation.</p> <p>Retain the Operative Plan rules on road frontage fencing which are well understood by the design community and achieve an appropriate balance in occupant amenity and streetscape outcomes.</p>	<p>Retain clause (iii) relating to internal boundaries as notified.</p> <p>Delete clauses (i) and (ii) and replace with the following (Operative Plan rule and associated diagrams reinstated):</p> <table><tr><td></td><td><u>Fence type</u></td><td><u>standard</u></td></tr><tr><td><u>i</u></td><td><u>Where at least 50% of the fence structure is visually transparent</u></td><td><u>1.8m</u></td></tr><tr><td><u>ii</u></td><td><u>Where less than 50% of the fence structure is visually transparent</u></td><td><u>1.2m</u></td></tr></table>		<u>Fence type</u>	<u>standard</u>	<u>i</u>	<u>Where at least 50% of the fence structure is visually transparent</u>	<u>1.8m</u>	<u>ii</u>	<u>Where less than 50% of the fence structure is visually transparent</u>	<u>1.2m</u>
	<u>Fence type</u>	<u>standard</u>												
<u>i</u>	<u>Where at least 50% of the fence structure is visually transparent</u>	<u>1.8m</u>												
<u>ii</u>	<u>Where less than 50% of the fence structure is visually transparent</u>	<u>1.2m</u>												

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
122.		14.6.2.7 - Landscaping and tree cover	Oppose	<p>In accordance with our submission seeking deletion of the tree canopy financial contribution rule, the landscaping and tree canopy rule is also sought to be deleted and replaced with the MDRS standard.</p> <p>An additional clause is proposed for non-residential activities that aligns with the MDRS outcomes.</p>	<p>Delete rule and replace with the following:</p> <p><u>14.5.2.2 landscaped area</u></p> <p><u>(1) A residential unit at ground floor level must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p> <p><u>2. The landscaped area may be located on any part of the development site, and does not need to be associated with each residential unit.</u></p> <p><u>3. Non-residential activities must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p>
123.		14.6.2.8 - Windows to street	Support in Part	<p>Clause (a) of the rule implements MDRS as per Schedule 3A.</p>	<p>Retain clause (a)-(d) as notified.</p> <p>Delete clause (e).</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Clause (b) re excluding gables is supported.</p> <p>Clause (c) relating to units with large streetscene setbacks is also supported as the large setbacks meant that the streetscene outcomes sought by the rule are less relevant.</p> <p>Clause (d) to incentivise front doors and their contribution towards an attractive street façade is supported.</p> <p>Clause (e), whilst trying to be enabling, adds considerable (and unnecessary) complexity to the rule for little gain.</p>	
124.		14.6.2.9 – Ground floor habitable rooms	Support in Part	<p>The Operative Plan includes a rule controlling ground floor habitable rooms which is well-established and appears to be working well.</p> <p>There are two key design outcomes sought, namely 1) the ground floor on the road</p>	<p>Amend the rule as follows:</p> <p>a. Any building that includes a residential unit shall:</p> <p>i. Where the residential unit fronts a road or public open space, unless built over a separate ground floor residential unit, have a habitable room located at ground floor level</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>frontage is habitable space rather than garaging in order to deliver positive streetscape outcomes; and 2) that at least 50% of the ground floor across the site is habitable space, to avoid the ground floor of complexes being overly dominated by garaging and undercroft parking areas.</p> <p>The proposed rule is sought to be amended to better articulate these two outcomes and to avoid developments arranged as horizontally stacked low-rise apartments being unnecessarily penalised through a requirement for every unit to individually have ground floor space.</p> <p>The outcome of 50% habitable at ground floor across a site is an appropriate outcome for HRZ.</p>	<p>with a minimum internal dimension of 3 metres; and</p> <p>ii. Any residential unit shall have at least 50% of any ground floor area as habitable rooms.</p> <p>a. <u>Where a residential unit fronts a road or public open space, it shall have a habitable room with a minimum internal dimension of 3 metres located at the ground floor level facing the frontage. This rule does not apply to upper-level units that are built over a separate ground floor residential unit; and</u></p> <p>b. have at least 50% of any ground floor area as habitable rooms, except on sites where at least 25% of the building footprint is more than 4 storeys, which shall have at least 30% of any ground floor area as habitable rooms.</p> <p><u>A minimum of 50% of the ground floor area across the site shall be occupied by habitable spaces and/or indoor communal living space. This area may include pedestrian access to lifts, stairs, and foyers.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
125.		14.6.2.10 - Outdoor living space	support	<p>Clauses (a) and (b) implement MDRS as per Schedule 3A</p> <p>Clause (c) provides a useful reduction for studio/ 1 bed units to 15m² (ground floor) or 6m² balcony if located above ground floor.</p>	Retain rule as notified.
126.		14.6.2.11 – Storage space	Support in Part	<p>The requirement for outdoor storage for bins and washing lines is an Operative Plan rule that appears to be working well.</p> <p>Clause (a) relating to outdoor storage is supported, although may be an unnecessary level of regulation if this matter is covered by urban design assessment matters.</p> <p>Clause (b) is a new rule in PC14. It requires a minimum amount of internal storage to be provided. Whilst internal storage spaces are useful, this rule is considered to be an unnecessary level of regulation.</p>	<ol style="list-style-type: none"> 1. Retain clause (a), noting that if outdoor storage is addressed as an urban design assessment matter then a separate rule may be unnecessary. 2. Delete clause (b).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				It is noted that clause (a) only applies to 4 or more units, while clause (b) applies to all units i.e. it is unclear what the rationale is behind the different number of units that trigger the clauses.	
127.		14.6.2.12 - Building coverage	Support in Part	<p>The rule implements MDRS as per Schedule 3A.</p> <p>Support additional exemption for eaves and guttering, although this is sought to be extended to 600mm which is a standard eave depth and better provides for weather tightness design solutions. Eaves do not have a significant impact on visual dominance, and setbacks from neighbours are controlled through separate rules on internal setbacks and height-to-boundary.</p> <p>Clause (a)(ii) seeks to enable greater site coverage in the HRZ. An increase to 60% is supported and is a useful tool in differentiating between MRZ</p>	<ol style="list-style-type: none"> 1. Amend as follows: <ol style="list-style-type: none"> a. <u>The maximum building coverage must not exceed 50 60% of the net site area;</u> <ol style="list-style-type: none"> i. <u>Any eaves and roof overhangs up to 300mm 600mm in width and guttering up to 200mm in width from the wall of a building shall not be included in the building coverage calculation.</u> 2. Delete Clause (a)(ii).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				and HRZ. The proposed clause is however unnecessarily complex, with outdoor space and landscaping both subject to other rules and noting that the proposed ground floor habitable space rule will also necessitate the provision of ground floor outdoor living spaces.	
128.		14.6.2.13 – water supply for fire fighting	Neutral		
129.		14.6.2.14 - Garaging	Oppose	<p>Whilst the equivalent rule in the MRZ requires garaging to be recessed behind the front façade, this rule requires garaging to be located behind the rear façade of a residential unit.</p> <p>This rule is unworkable for carparking levels in apartment buildings where such parking is invariably located beneath (or above) a residential unit rather than behind the unit's rear façade.</p>	<p>Delete the rule and replace as follows:</p> <p><u>14.6.2.14 garaging and carports</u></p> <p><u>Where a residential unit fronts towards a road, any garage or carport shall be located at least 1.2 metres behind the front façade of a residential unit.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>For smaller scale developments ie. 2-3 storey, having parking recessed behind the front façade provides an acceptable outcome, in combination with the urban design assessment matters for 4+ units.</p> <p>The rule wording sought in the equivalent rule in the MRZ is considered to be equally applicable.</p>	
130.		14.6.2.15 – Location of mechanical ventilation	Oppose	<p>New rule that requires a 3m setback if at ground level between a residential unit and the road or a shared accessway. Presumably it is visual effects that are the concern.</p> <p>Level of design detail that is unnecessary to regulate. If mounted at ground level then even a short 1.2m high fence is sufficient to visually screen in a similar manner to the proposed rule on bin storage.</p>	Delete the rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				As drafted the rule applies to mechanical units on the ground, whereas they would be permitted if wall-mounted despite having a worse visual outcome. It also applies to mechanical units located adjacent to internal boundaries where the property next door (over the fence) has an accessway.	
131.		14.6.2.16 - Minimum unit sizes	Support	No amendments are proposed to the Operative Plan rule on minimum unit sizes. This rule is well-established and appears to be working well.	Retain rule as notified.
132.		14.6.2.17 - Spine road setbacks	Oppose	<p>The new rule requires buildings and outdoor living spaces to be set back 4m from spine road corridors (where the corridor is less than 24m in width).</p> <p>It is understood that the intention of the rule is to enable road widening in the future to accommodate public rapid transit. If Council's intention is to acquire land in the future to</p>	<p>Delete the rule.</p> <p>If land acquisition for public works is the intent, then Council should initiate a Notice of Requirement to designate the corridor.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>facilitate public works then it should use the designation powers available to it.</p> <p>Given the highly developed nature of these existing corridors with lengthy sections of commercial property built to the road boundary, it is unclear how any corridor-long road widening will occur without major land acquisition and demolition.</p>	
14.7 – Residential Hills Zone					
133.				<p>The Residential Hills zone is an existing Operative Plan zone that covers the Port Hills Suburbs. PC14 as notified includes a QM on public transport accessibility. Areas that fall within this QM retain their existing low-density Operative Plan zoning.</p> <p>It would appear that the public transport QM is the only QM</p>	Delete zone and replace with MDZ.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				that is generating the need to retain the Residential Hills Zone. Given our submission that the public transport QM is not a valid QM and is sought to be deleted, a consequence is that the Residential Port Hills Zone is also sought to be deleted and replaced by MRZ	
14.12 – Future Urban Zone					
134.				See above discussion on Objective 14.2.8. The Future Urban Zone ('FUZ') is a relabelling of Residential New Neighbourhood Zone. This is the wrong label and not the intention of the National Planning Standards. FUZ are a mechanism for signalling rural areas that will be urbanised at some point in the future as a holding pattern, with the 'live' zone to be developed at a later date through a subsequent plan change process. RNN are existing well-established live	Delete the FUZ and replace with MDRZ. The associated rules relating to build-out of these areas/ compliance with ODPs, or any area-specific rules can equally be located at the end of the MDRZ provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				zones (albeit that some of them are still being built out). These areas are sought to simply be MDRZ unless there is a qualifying matter in play that would preclude MDRZ zoning.	
14.14 – Community Housing Redevelopment Mechanism					
136.	Chapter 14.14 – Community Housing Redevelopment Mechanism	Whole Chapter	Support	Kāinga Ora supports the deletion of the Community Housing Redevelopment Mechanism, provided Plan Change 14 is consistent with the MDRS and NPS-UD.	Kāinga Ora supports the deletion of the Community Housing Redevelopment Mechanism, provided Plan Change 14 is amended consistent with the relief sought in this submission.
Chapter 15 - Commercial					
137.		Related to the commercial chapter as a whole	Support in part	Kāinga Ora seeks that Metropolitan Centres are introduced within the centres hierarchy, as per the forward-looking aspects of the NPS-UD policies of 1, 3, and 6. These are sought to cover the existing key activity areas for Riccarton, Papanui, and Hornby. The size,	<ol style="list-style-type: none"> 1. Insert reference to Metropolitan Centres in all relevant provisions of the chapter. 2. Insert rules for metropolitan centre zone as attached in Appendix 2.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>scale, existing and future function of these centres are such that they merit the application of a Metropolitan Centre Zone classification, and thus an appropriate objective, policy and rules framework.</p> <p>Further, recent and proposed investment in public and active transport modes along the corridors in which these activity centres are located support the case for a zoning classification reflective of their relative position within the centres hierarchy.</p>	
Chapter 15.2 – Commercial Policy framework					
138.		Policy 15.2.2.1, Table 15.1 – Commercial zone titles	Support in part	<p>Support amendments to Table 15.1 of Policy 15.2.2.1 in so far as these reflect National Planning Standards nomenclature.</p> <p>Kāinga Ora</p>	<p>Realignment of Commercial Zone names with National Planning Standard (NPS) zone descriptions (Chapter 2 Interpretation). The allocation of centres to the NPS labelling appears generally appropriate if Metropolitan Centre is added.</p> <p>B. Town Centre: Key Activity Centre:</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>Retain reference to '<i>High Density Housing is contemplated ... and around larger local centres</i>'.</p> <p>C. Local Centres: Retain reference to '<i>High Density Housing is contemplated ... and around larger local centres</i>'.</p>
138.		Table 15.1 - Centre hierarchy		<p>The role and function of centres has a direct bearing on the associated geographic extent and zoning of high density residential zoning around the centre. The hierarchy needs to reflect both current condition and potential future state in the event that enabled development occurs.</p> <p>The centre hierarchy for Local Centres in particular is considered to be unnecessarily complex and it is sought that these be simplified, along with a commensurate simplification in the heights and zoning of the surrounding residential area.</p>	<ol style="list-style-type: none"> 1. Amend role and function of Church Corner, Sydenham and Merivale from 'Local Centre (Large)' to 'Town Centre'. 2. Consolidate all Local Centres into a simple category i.e. delete the distinction between 'small' and 'medium'. 3. Incorporate Metropolitan centres and relabel Riccarton, Hornby, Papanui Northlands as such and as shown within Appendix 3.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Church Corner, Sydenham and Merivale are evolving and will be establishing a substantial residential catchment through development enabled by PC14. In addition, these 'centres' are positioned within corridors identified as Mass Transit Network and Growth Corridors within the Greater Christchurch 'Huihui Mai' Consultation Plan for accommodating Growth to 2050. The corresponding Council s32 Report 'Commercial Appendix 2' identifies such centres as performing a greater role in intensification enablement and diversity of function.</p> <p>The large local centres should be town centres, with small and medium local centres merged into a single 'local centre' category.</p>	
139.		Policy 15.2.2.7 – Residential activity in centres	Support in part	Amend so that the provision also provides for residential activity within Neighbourhood centres. Rule 15.5.1.1.1(P19)	Amend Policy 15.2.2.7 as follows: Residential activity in district Town, and

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				provides for such above ground floor, or to the rear of the premises fronting the street.	Local <u>and neighbourhood</u> centres Residential activity in district town , <u>and</u> Local <u>and neighbourhood</u> neighbourhood centres
140.		Objective 15.2.3(b) – Mixed use areas	Support in part	<p>Kāinga Ora support the principle of providing for Mixed Use Zones proximate to the City Centre Zone to transition to higher density residential neighbourhoods.</p> <p>The application of the provision is unclear however. The 'Objective Heading' refers to mixed use <u>outside the central city</u>. Central City is defined (in the operative Plan) as that part of the City contained within the four avenues. Whereas the amendment to Chapter 2 Interpretation to introduce 'City Centre – means the City Centre Zone'.</p> <p>This confusion is then reinforced in Policy 15.2.3.2 where the 'heading' references Mixed Use Zones outside the central city, then conflicts with</p>	<p>Amend the objective as follows:</p> <p>15.1.1 Objective - Office parks and mixed use areas <u>outside the central city (except the Central City Mixed Use and Central City Mixed Use (South) Zones)</u>.</p> <p>a. Recognise the existing nature, scale and extent of commercial activity within the Commercial Office and Commercial Mixed Use Zones, but avoid the expansion of existing, or the development of new, office parks and/or mixed use areas.</p> <p>b. <u>Mixed use zones located within a 15min walking distance of close to the City Centre Zone transition into high density residential neighbourhoods that contribute to an improved</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>(b) which references increased opportunities within a 15 minute walking distance of the City Centre Zone (which would therefore include the Commercial Central City Mixed Use and Central City Mixed Use (South Frame) zones). If the aim is to deliberately exclude the Central City Mixed Use and South Frame Zones, this should be made clear, and Policy 15.2.7.1 'Diversity of Activities' amended to encourage a transition into good quality residential neighbourhoods.</p> <p>'Close' should be replaced by explicit reference to the respective zones (presumed to be the 15-minute walking distance in Policy 15.2.3.2(b)).</p> <p>Referencing a reduction in greenhouse gas emissions is superfluous in this context, given proximity and modal choice.</p>	<p><u>diversity of housing type, tenure and affordability</u> and support a reduction in greenhouse gas emissions.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				The intent and objectives of these amendments to the plan change do not seem to be achievable through the rules proposed. Kāinga Ora submits that it may be more appropriate to consider these zone changes and rules through a subsequent schedule 1 process.	
141.		Policy 15.2.3.2 – Mixed use	Support in part	<p>Amend 'outside the central city' as above.</p> <p>A 'high quality' residential neighbourhood is subjective and is referenced in terms of residential zone outcomes (Objective 14.2.4). Such is an inappropriately high threshold for residential development in a transitioning and Mixed Use zone. Contributing positively to quality and design is sufficient.</p> <p>Delete reference to 'reducing greenhouse gas emissions' as this would be immaterial at this scale, and the areas are zoned for mixed use which anticipates residential activity being</p>	<p>Amend as follows:</p> <p>15.2.3.2 Policy – Mixed use areas outside the central city (except the Central City Mixed Use and Central City Mixed Use (South) Zones)</p> <p>a. Recognise the existing nature, scale and extent of retail activities and offices <u>in mixed use zones outside the central city in Addington, New Brighton, off Mandeville Street and adjoining Blenheim Road</u>, while limiting their future growth and development to ensure commercial activity in the City is focussed within the network of commercial centres.</p> <p>b. <u>Support mixed use zones at</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>proximate to necessary facilities / employment thereby reducing trip journeys. Support for greater housing diversity and including 'alternative housing models' although noting that these are not well defined (Chapter 2 Interpretation).</p> <p>The greenway requirements in Appendix 15.15.12 and 15.15.13 are problematic to implement given the fragmented ownership of these areas. The provision of small parks and greenlinks is a matter for Council to facilitate through LGA processes and a more comprehensive place-making programme that will be vital in supporting a shift from industrial to mixed use neighbourhoods. If specific greenlinks are considered to be vital then the Council should use its designation powers to secure these spaces as a more efficient and effective method than the proposed comprehensive housing rules.</p>	<p><u>Sydenham, Addington, off Mandeville Street, and Philipstown located within a 15 minute walking distance of the City Centre Zone, to transition into high good quality residential neighbourhoods by:</u></p> <ul style="list-style-type: none"> i. <u>enabling comprehensively designed high-good-quality, high-density residential activity;</u> ii. <u>ensuring that the location, form and layout of residential development supports the objective of reducing greenhouse gas emissions and provides for greater housing diversity including alternative housing models;</u> iii. <u>requiring developments to achieve a high-good standard of on-site residential amenity to offset and improve the current low amenity industrial environment and mitigate potential conflicts between</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p><u>uses;</u></p> <p>iv. <u>encourage small-scale building conversions to residential use where they support sustainable re-use and provide high-good quality living space, and contribute to the visual interest of the area.</u></p> <p>c. Avoid Comprehensive Residential Development of sites within the Comprehensive Housing Precinct that are identified in Appendix 15.15.12 and 15.15.13 unless the relevant shared pedestrian/cycleway, greenway or road connection is provided.</p> <p>d. For sites identified within Appendix 15.15.12 and 15.15.13 encourage the connection to facilitate convenient and accessible through block connectivity.</p>
142.		Objective 15.2.4 – urban form	Support	No changes necessary.	Retain the objective as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
143.		Policy 15.2.4.1 – scale and form	Support in part	<p>The foundation of this policy is found within Policy 3 of the NPS – UD. That Policy requires at clause (a) within city centre zones, building heights and density of urban form to realise as much development capacity as possible. Accordingly, the current wording of clause (i) to (v) which seek to limit building height is not supported.</p> <p>For clause (b)(i) the duplication associated with the amendment can be removed.</p> <p>For clause(b)(ii) it is considered that the District Plan should be forward looking, hence the need for building heights to be commensurate with their 'anticipated' role.</p>	<p>1. Amend Clause (a) as follows:</p> <p>15.2.4.1 Policy – Scale and form of development</p> <p>a. Provide for development of a <u>significant</u> scale and form <u>massing that reinforces the City's City Centre Zone's distinctive sense of place and a legible urban form by enabling as much development capacity as possible to maximise the benefits of intensification, whilst managing building heights adjoining Cathedral Square, Victoria Street, New Regent High Street and the Arts Centre to account for recognised heritage and character values.</u> in the core of District Centres and Neighbourhood Centres, and of a lesser scale and form on the fringe of these centres.</p> <p>2. Delete Clause (a)(i)-(v).</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>1. Amend Clause (b) as follows:</p> <p>b. The scale and form of development in <u>other commercial</u> centres shall:</p> <p style="padding-left: 40px;">i. reflect the context, character and the anticipated scale of the zone and centre's function <u>by</u>:</p> <p style="padding-left: 40px;"><u>ii. providing for the tallest buildings and greatest scale of development in the city centre to reinforce its primacy for Greater Christchurch and enable as much development capacity as possible to maximise the benefits of intensification;...</u></p> <p>2. Retain the remaining parts of clause (b) as notified.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
144.		Policy 15.2.4.2 - design	Oppose	There is no basis within the MDMR Act nor NPS-UD that facilitates or provides support for the inclusion of these provisions. It is considered that the provisions introduced would function to limit or reduce potential development capacity. The provisions are not accompanied by a comprehensive s32, do not adequately recognise the functional requirements associated with commercial developments, and would not be the more appropriate in terms of achieving Objective 3.3.1 and 3.3.2 of the Plan.	Delete all inclusions introduced and retain existing Operative Plan Policy 15.2.4.2.
145.		Policy 15.2.4.6 – Strategic Infrastructure	Support in Part	This policy contains operative plan wordings using the term ‘avoiding’ in relation to noise sensitive activities and the Airport Noise Influence Area, we seek amendment to this wording to reflect management solutions are appropriate.	Amend policy 15.2.4.6 as follows: Provide for the effective development, operation, maintenance and upgrade of strategic infrastructure and avoid adverse effects of development on strategic infrastructure through managing the location of activities and the design of stormwater areas. This includes but is not limited to, managing noise sensitive activities within commercial zones

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					located within the 50-dB Ldn Air Noise Contour and within the Lyttelton Port Influences Overlay Area.
146.		Objective 15.2.5(a)(i)	Support in Part	This policy contains existing Operative Plan wording that's no longer appropriate "...and limiting the height of buildings to support an intensity of commercial activity across the zone".	<p>Amend Objective 15.2.5 as follows:</p> <ul style="list-style-type: none"> a. A range of commercial activities, community activities, cultural activities, residential activities and guest visitor accommodation are supported in the Central City to enhance its viability, vitality and the efficiency of resources, while encouraging activities in specific areas by: <ul style="list-style-type: none"> i. Defining the Commercial Central City Business City Centre Zone as the focus of retail activities and offices and limiting the height of buildings to support an intensity of commercial activity across the zone;

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
147.	Central City	Policy 15.2.6.3 - Amenity	Support in part	<p>Deletion of the operative clause (ii) is supported.</p> <p>Seek deletion or amendment of inserted clause (ii) which acts as a proxy to otherwise limit height contrary to the statutory requirement of Policy 3 of the NPS-UD.</p>	<ol style="list-style-type: none"> 1. Support the deletion of existing clause (a)(ii). 2. Delete the replacement Clause (a)(ii).
148.	Central City	Policy 15.2.6.4 – Residential intensification	Support in part	<p>Seek moderation of the qualifier 'high quality' to either good, or 'positively contributes'.</p>	<p>Amend Policy 15.2.6.4(a) as follows:</p> <p>Encourage the intensification of residential activity within the Commercial Central City Business City Centre Zone by enabling high-good quality residential development that positively contributes to supports a range of types of residential development typologies, tenures and prices, with an appropriate level of amenity including:...</p>
149.	Central City	Policy 15.2.6.5 – Pedestrian focus	Oppose	<p>Delete the PC14 amendment relating to 'wind generation'. It is not considered that the respective s32 analysis demonstrates that such limits/</p>	<p>Amend Policy 15.2.6.5(ii) as follows:</p> <p>ii. requiring development to support a</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				wind rules are the most efficient or effective method.	pedestrian focus through controls over building location and continuity, weather protection, height, wind generation , sunlight admission, and the location of parking areas;
150.	Central City Mixed Use Zone	Objective 15.2.7 – central city mixed use	Oppose	Delete insertion of reference to 'high quality' as inappropriate in this context.	15.2.7 Objective – Role of the Central City Mixed Use Zone a. The development of vibrant, high good quality urban areas where a diverse and compatible mix of activities can coexist in support of the Commercial Central City Business City Centre Zone and other areas within the Central City Central City .
151.	Central City Mixed Use Zone	Policy 15.2.7.1 – diversity of activities	Support in part	The Central City mixed use zone is well located within easy walking and cycling distance of the wide range of services and facilities on offer. As such the height limit is sought to reflect such proximity and not be tagged or limited to colocation with large faculties, as the whole of the zone is well-	<u>Amend Clause (a)(viii) as follows:</u> viii. opportunities for taller buildings to accommodate residential activity and visitor accommodation, to support the vibrancy of the City Centre Zone, where co-located with the and the nearby large-scale community facilities, Te Kaha

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				located in close proximity to these facilities.	<u>and Parakiore.</u>
152.	Central City Mixed Use Zone	Policy 15.2.8.1 - usability, Policy 15.2.8.2 - amenity	Oppose	<p>The amenity provisions introduced are too fine grain to be set as policies, are unsubstantiated by s32 analysis, do not respond to a resource management issue, and would act as detriment to development. Kāinga Ora seek that these be deleted.</p> <p>Policy 15.2.8.2(viii) is not opposed, subject to the amendments sought above as to setting an appropriate urban design context, and not set at 'high quality'.</p>	<ol style="list-style-type: none"> 1. Retain Policy 15.2.8.1 as existing in the Operative Plan and delete all PC14 amendments. 2. Retain Policy 15.2.8.2 as existing in the Operative Plan and delete all PC14 amendments, with the exception of clause (viii) which is sought to be retained.
153.	Central City Mixed Use Zone	Policy 15.2.8.3 – residential development	Oppose	The requirements in the NPS-UD to facilitate differing housing typologies and provide intensification opportunities is disenabled by provisions seeking excessive private amenity space.	<p>Delete amendments seeking improved private amenity space, compensatory to the predominantly commercial nature of the Central City Mixed Use Zone.</p> <p>15.2.8.3 Policy Residential Development</p> <p>a. provide for ...</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>b. <u>Require a level of private amenity space for residents that is proportionate to the extent of residential activity proposed.</u> and which compensates for the predominantly commercial nature of the area, including consistent with the intended built form and mix of activities within that environment, through:...</p>
154.	Central City Mixed Use Zone (South Frame)	Policy 15.2.10.2 – residential development	Support	Policy amendments appropriately recognise area context.	Retain policy as notified
15.4 – Commercial Zone rules					
155.	Town Centre Zone Rules Local Centre Rules Neighbourhood Centre Zone	City Spine Transport Corridor 15.4.1.3(RD8) 15.5.1.3(RD8) 15.6.1.3(RD7)	Oppose	Delete the provision in its entirety. The provision is not justified in terms of s32, is not the most appropriate mechanism to secure increased road widths, or proxy road reserve planting and landscaping at the expense of developable area. Provision and Qualifying matter is not	Delete all City Spine Transport Corridor activity rules from the suite of commercial zones.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	Large Format Retail Zone Mixed Use Zone	15.8.1.3(RD3) 15.10.2.10		supported by Policy 4/ clause 3.32 of the NPS-UD. Inconsistency with design outcomes specified in Rule 15.4.2.3, including clause (i) Key Pedestrian Frontages as associated with Riccarton, Church Corner, Merivale and Papanui Centres. If road widening is required to facilitate rapid transit infrastructure then Council should use its designating powers.	
156.	Town Centre Zone Built Form Standards Local Centre Built Form Standards	15.4.2.1(a)(ii) 15.5.2.1(a)(i)	Oppose / cl16(b)	Delete erroneous reference to Local Centre in 15.4.2.1(a)(ii) Delete erroneous reference to Town Centre in 15.5.2.1(a)(i)	ii. 1,000m² GLFA where located in a Neighbourhood Local Centre identified in Policy 15.2.2.1, Table 15.1 ii. 4,000m² GLFA where located in a District Town Centre as identified in Policy 15.2.2.1, Table 15.1; or
157.	Town Centre Zone Built Form Standards	14.4.2.2 Maximum Building Height	Support in part	Increased development capacity is sought to be enabled specifically at Hornby,	1. Adopt Metropolitan Centre Zone Rules proposed in the Kāinga Ora submission Appendix 2 and amend

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought												
				<p>Riccarton and Papanui noting that the role and function of these centres is already straddling that associated with the role and function of Metropolitan Centres as set out within the National Planning Standards. The adoption of the Metropolitan Centre Rules Kāinga Ora seeks would take into account that role and function (including social amenity) would be anticipated to grow and diversify given the anticipated level of residential catchment growth. An appropriate height limit is accordingly 36m.</p> <p>For the remaining Town Centres, noting anticipated corridor growth and development as associated with Sydenham, Merivale and Church Corner (elevating these centres to Town Centres in the retail hierarchy) (refer submission to Table 15.1) a height limit of 22m is the more appropriate.</p>	<p>these rules as appropriate.</p> <p>2. Amend rule 14.4.2.2 as follows:</p> <p>a. The maximum height of any building shall be as follows:</p> <table><tr><th></th><th>Applicable to</th><th>Standard</th></tr><tr><td>i.</td><td>All sites in a District Town Centre (other than specified below)</td><td>220 metres</td></tr><tr><td>ii.</td><td><u>All sites in a Town Centre at Riccarton, or Hornby or Papanui</u></td><td><u>22 metres</u></td></tr><tr><td>iii.</td><td>...</td><td></td></tr></table>		Applicable to	Standard	i.	All sites in a District Town Centre (other than specified below)	220 metres	ii.	<u>All sites in a Town Centre at Riccarton, or Hornby or Papanui</u>	<u>22 metres</u>	iii.	...	
	Applicable to	Standard															
i.	All sites in a District Town Centre (other than specified below)	220 metres															
ii.	<u>All sites in a Town Centre at Riccarton, or Hornby or Papanui</u>	<u>22 metres</u>															
iii.	...																

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
158.	Town Centre Zone Built Form Standards	Sunlight and Outlook 15.4.2.5	Oppose in part	Refer submission point relating to amended Recession Planes as a Qualifying Matter and changes to Appendix 14.16.2.	Consequential amendments associated with Appendix 14.16.2. Adopt Metropolitan Centre Zone Rules proposed in the Kāinga Ora submission Appendix 2 and amend these rules as appropriate.
	Local Centre Zone Standards	15.5.2.5			
	Neighbourhood Centre Zone Standards	15.6.2.4			
	Large Format Zone	15.8.2.4			
	Commercial Office Zone	15.9.2.4			
	Mixed Use Zone	15.10.2.4			
	City Centre Zone	15.11.2.9			
	Central City Mixed Use Zone	15.12.2.6			

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
159.	Town Centre Zone Built Form Standards Local Centre Zone Standards Neighbourhood Centre Zone Standards Large Format Zone Mixed Use Zone City Centre – Mixed Use Zone	City Spine Transport Corridor 15.4.2.10 15.5.2.10 15.6.2.11 15.8.2.13 15.10.1.3 (RD5) 15.12.2.13 / 15.12.1.3(RD6)	Oppose	Delete the provision in its entirety. The provision is not justified in terms of s32, is not the most appropriate mechanism to secure increased road widths, or proxy road reserve planting and landscaping at the expense of developable area. Provision and Qualifying matter is not supported by Policy 4/ clause 3.32 of the NPS-UD.	Delete all City Spine Transport Corridor built form rules from the suite of commercial zones.						
160	Local Centre Zone Built Form Rules – Maximum Building Height	15.5.2.2		Support in part As identified in the submission point on Town Centre heights – Merivale, Church Corner and Sydenham are sought to be elevated to a ‘Town Centre’ zone and provided with a 22m height limit.	Replace the table in 15.5.2.2 as follows (with Merivale, Church Corner and Sydenham elevated in Table 15.1 to Town Centre zoning): <table><tr><th></th><th>Applicable to</th><th>Standard</th></tr><tr><td>ii</td><td>Ferrymead and all sites in a Local Centre (medium)</td><td>20 metres</td></tr></table>		Applicable to	Standard	ii	Ferrymead and all sites in a Local Centre (medium)	20 metres
	Applicable to	Standard									
ii	Ferrymead and all sites in a Local Centre (medium)	20 metres									

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought												
				<p>In the alternative, they are sought to be afforded a 22m height limit as Local Centre (Large).</p> <p>As sought above the remaining medium centres and Ferrymeed are sought to become ‘large’ Local Centres, with the ‘small’ Local Centres simply being ‘local centres’.</p> <p>In terms of heights, the new large centres are sought to have a consistent 22m height limit to provide for additional capacity and conformity with the proposed HRZ height limits adjoining these centres within this submission. The exception is New Brighton, given qualifying matters associated with appropriate natural hazards reduce intensification opportunities.</p> <p>All remaining Neighbourhood Centres are sought to have a standard height limit of 14m to provide a scale commensurate</p>	<table><tr><td></td><td><u>as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u></td><td></td></tr><tr><td>ii.</td><td><u>New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1</u></td><td><u>14metres</u></td></tr></table> <p>Or in the alternative:</p> <p>15.5.2.2 Maximum building height</p> <p>a. The maximum height of any building shall be as follows:</p> <table><tr><th></th><th>Applicable to</th><th>Standard</th></tr><tr><td>i</td><td><u>Merivale, Church Corner and Sydenham North (Colombo Street between Brougham Street and Moorhouse Avenue)</u></td><td><u>22 metres</u></td></tr></table>		<u>as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u>		ii.	<u>New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1</u>	<u>14metres</u>		Applicable to	Standard	i	<u>Merivale, Church Corner and Sydenham North (Colombo Street between Brougham Street and Moorhouse Avenue)</u>	<u>22 metres</u>
	<u>as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u>																
ii.	<u>New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1</u>	<u>14metres</u>															
	Applicable to	Standard															
i	<u>Merivale, Church Corner and Sydenham North (Colombo Street between Brougham Street and Moorhouse Avenue)</u>	<u>22 metres</u>															

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought															
				with the surrounding MRZ areas and to differentiate from the 12m height limit applying to Neighbourhood Centres.	<table><tr><td>ii</td><td><u>Ferryhead and all sites in a Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u></td><td>20 metres</td></tr><tr><td>ii.</td><td>New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1</td><td>14 metres</td></tr><tr><td>i.</td><td>All sites in a District Centre</td><td>20 metres</td></tr><tr><td>ii.</td><td>Any building in a District Centre within 30 metres of an internal boundary with a residential zone</td><td>12 metres</td></tr><tr><td>iii. i.</td><td><u>All sites in a Neighbourhood Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1.</u></td><td><u>12 metres</u></td></tr></table>	ii	<u>Ferryhead and all sites in a Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u>	20 metres	ii.	New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1	14 metres	i.	All sites in a District Centre	20 metres	ii.	Any building in a District Centre within 30 metres of an internal boundary with a residential zone	12 metres	iii. i.	<u>All sites in a Neighbourhood Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1.</u>	<u>12 metres</u>
ii	<u>Ferryhead and all sites in a Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u>	20 metres																		
ii.	New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1	14 metres																		
i.	All sites in a District Centre	20 metres																		
ii.	Any building in a District Centre within 30 metres of an internal boundary with a residential zone	12 metres																		
iii. i.	<u>All sites in a Neighbourhood Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1.</u>	<u>12 metres</u>																		

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought									
					<table><tr><td>iv.</td><td>Other locations</td><td>17 metres</td></tr><tr><td>ii.</td><td>All sites in a Neighbourhood Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1.</td><td>14 metres</td></tr><tr><td>iii.</td><td>All sites in a Neighbourhood Local Centre (large) as identified in Table 15.1 of Policy 15.2.2.1.</td><td>20 metres</td></tr></table>	iv.	Other locations	17 metres	ii.	All sites in a Neighbourhood Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1.	14 metres	iii.	All sites in a Neighbourhood Local Centre (large) as identified in Table 15.1 of Policy 15.2.2.1.	20 metres
iv.	Other locations	17 metres												
ii.	All sites in a Neighbourhood Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1.	14 metres												
iii.	All sites in a Neighbourhood Local Centre (large) as identified in Table 15.1 of Policy 15.2.2.1.	20 metres												
161.	Neighbourhood Centre Zone – Built Form Standards	15.6.2.1 - Height	Support in part	<p>The increase in height of buildings from 8m to 12m is supported.</p> <p>Within the Central City, an increased height to 32m is the more appropriate, given these areas are surrounded by HRZ.</p>	<p>Amend rule 15.6.2.1 as follows:</p> <p>15.6.2.1 Maximum Building Height</p> <p>a. The maximum height of any building shall be as follows:</p> <table><tr><th></th><th>Applicable to</th><th>Standard</th></tr><tr><td>i.</td><td>All sites unless specified below</td><td>8 <u>12</u> metres</td></tr><tr><td>ii.</td><td>For sites within the Central City</td><td></td></tr></table>		Applicable to	Standard	i.	All sites unless specified below	8 <u>12</u> metres	ii.	For sites within the Central City	
	Applicable to	Standard												
i.	All sites unless specified below	8 <u>12</u> metres												
ii.	For sites within the Central City													

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
					<table><tr><td><u>located:</u></td><td><u>20m</u></td></tr><tr><td>a. <u>To the east of Barbadoes Street</u></td><td><u>32m</u></td></tr><tr><td>b. <u>To the west of Barbadoes Street</u></td><td></td></tr></table>	<u>located:</u>	<u>20m</u>	a. <u>To the east of Barbadoes Street</u>	<u>32m</u>	b. <u>To the west of Barbadoes Street</u>	
<u>located:</u>	<u>20m</u>										
a. <u>To the east of Barbadoes Street</u>	<u>32m</u>										
b. <u>To the west of Barbadoes Street</u>											
162.	Mixed Use Zone	15.10.1.1 Activity rules	Support in Part	<p>Support the enablement of residential in P27, subject to deletion of the 'Comprehensive Housing Precinct'.</p> <p>The rule framework does not enable the suite of community activities that are inherent in good quality mixed use neighbourhoods. The rule framework must enable activities such as preschools, education, spiritual, health, community faculties, and convenience retail to support the emergence of a genuinely mixed use neighbourhood. The activity standards for these activities in the MRZ are equally</p>	<ol style="list-style-type: none">1. Amend P27 to delete clause (b) relating to the Comprehensive Housing Precinct.2. Add additional activity rules enabling a suite of community activities i.e. rules 14.5.1.1 P5-P13, P20.						

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>appropriate and set appropriate limits on activity size to ensure effects of larger facilities are able to be assessed.</p> <p>Such activities do not generally give rise to retail distribution effects, and will not give rise to reverse sensitivity effects given the clear change in outcomes sought for these areas and the enablement of residential activity throughout the mixed use zone.</p>	
163.	Mixed Use Zone	15.10.2.1 - Height	Support in part	<p>The insertion of (b) providing for higher intensity of residential development is supported. However a height limit of 22m is considered the more appropriate for consistency with the height limits proposed within this submission, and appropriate levels of enablement, along with the unnecessary need to differentiate between the heights of buildings depending on where they are located on the site.</p>	<p>Amend rule 15.10.2.1 as follows:</p> <p>Maximum building height</p> <ol style="list-style-type: none"> The maximum height of any building shall be 15 metres, <u>unless specified below.</u> <u>The maximum height of any Comprehensive Residential Development located within the Comprehensive Housing Precinct (shown on the</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>planning maps) shall be 21 22 metres, for buildings located adjacent to the street, or 12 metres for buildings located at the rear of the site.</p>
164.	Mixed Use Zone – Comprehensive Residential Development	<p>15.10.1.1(P27)</p> <p>15.10.1.3 (RD3 / RD4) Comprehensive Residential Development</p> <p>15.10.2.9 Minimum Standards for Comprehensive Residential Development.</p> <p>15.14.3.40 Assessment Matters Comprehensive Redevelopment</p> <p>15.10.1.5(NC3)</p> <p>Appendix 15.15.12 – Sydenham and Appendix 15.15.13. Appendix 15.15.14</p>	Oppose	<p>These provisions are overtly complicated, unworkable and provide inappropriate mechanisms to manage development and acquire public laneways (Appendix 15.15.12 – Sydenham and Appendix 15.15.13).</p> <p>Clarity needs to be improved in (P27) that those provisions apply to all MUZ except:</p> <ul style="list-style-type: none"> (i) Blenheim Road / Main South Road 15.10.1.4(D1); and (ii) Comprehensive Housing Precinct (15.10.1.3 (RD3) and (RD4). 	<p>Delete all existing provisions and provide a suite of workable and clear rules that encourage and enable large scale redevelopment.</p> <p>Remove statutory impediments in Appendix 15.15.12 – Sydenham and Appendix 15.15.13 requiring ‘Greenways’ and ‘Shared Pedestrian / Cycleways’ and seek to facilitate through more appropriate means – such as negotiated purchase.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Reference in 15.10.1.3(RD3) to 15.14.3.40(a)(iv) and (v) is incorrect, as these provisions do not exist.</p> <p>The respective matters identified in relation to 15.10.1.3(RD4) are overly excessive and broad.</p> <p>15.10.1.5(NC3) has the statutory function of deeming all Comprehensive Residential Development within the precinct identified for such (at Appendix 15.15.12 and 15.15.13) non-complying. This inconsistency and error needs to be corrected.</p> <p>The matters expressed in 15.14.3.40 are overly excessive and broad (effectively not restricting the matters to be assessed), lack certainty of achievement, and are absent a resource management purpose. Collectively these matters are the antithesis of the achievement of Objective 3.3.1</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>and Objective 3.3.2 and will disenable investment and redevelopment. Reference is sought to be made to a good quality living environment that positively contributes to local amenity as a high quality environment is contextually unobtainable in a transitioning Mixed Use Environment.</p> <p>The requirements in Appendix 15.15.12 – Sydenham and Appendix 15.15.13. Appendix 15.15.14 are not the most appropriate in terms of s32 of the Act, and will act to disenable redevelopment and the purpose of the Zone.</p>	
165.	Central City Zone	15.11.1.1(P18) – Small buildings	Support	Support the introduction of a permitted pathway for small buildings where the built form rules and activity standards are sufficient to deliver acceptable urban design outcomes and the need for a separate urban design assessment/ consent is able to be avoided.	Retain P18 as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
166.	Central City Zone	15.11.1.2(C1)	Oppose	<p>Additions to C1 are not in accordance with the statutory requirements of the NPS-UD, Sections 77G or 77H of the Resource Management Act, nor Objective 3.3.1 and 3.3.2 of the Plan. The provisions would act as proxies to otherwise reduce development capacity.</p> <p>The Operative Plan controlled activity status for urban design assessments is sought to be retained.</p>	Delete proposed PC14 amendments to the rule i.e. retain the Operative Plan provision.
167.	Central City Zone Central City Mixed Use Zone	Residential Activity 15.11.1.3(RD4) Matters (b) and (c) 15.12.1.3(RD)(b) and (c)	Oppose	<p>Additional controls are unnecessary and inappropriate. These matters are able to be addressed by existing matters (i.e 15.14.2.9(b) and 15.14.2.9(d).</p>	<p>Amend the rule by deleting clauses (b) and (c) as follows:</p> <p>a. Residential activity in the Commercial Central City Business City Centre and Central City Mixed Use Zones – Rule 15.134.2.9</p> <p>b. Glazing – 15.14.3.37</p> <p>c. Outlook spaces – 15.14.3.38.</p>
168.	Central City Zone	Buildings 15.11.1.3(RD5)	Oppose	<p>As a consequential amendment to the relief sought in this submission to delete various</p>	<p>Amend rule by deleting clauses (m) and (n) as follows:</p> <p>m. Upper floor setbacks, tower</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought			
				built form rules, the activity status rule also needs amending to remove reference to rule breaches with the built form rules on wind, upper floor setbacks and tower dimension.	dimension and site coverage – Rule 15.14.3.35 n. Wind – Rule 15.14.3.39			
169.	Central City Zone	Sunlight and Outlook for the street 15.11.2.3	Oppose	Acts as a proxy to limit development capacity in the Central City in a manner that is not founded in the NPS-UD Policy 3.	Delete rule			
170.	Central City Zone	Building Height – 15.11.2.11	Support in part	<p>There is an inconsistency between the definition of Building Base and the rule. The definition of Building Base is sought to be deleted, as it is internally inconsistent with provisions in the Plan and is uncertain in purpose.</p> <p>Building Base is defined as: <i>‘In respect to the City Centre and Central City Mixed Use Zones, means any part of any building that is below the maximum permitted height for that type of building in the zone’.</i></p>	<p>1. Amend definition of Building Base as:</p> <p>Building Base: In respect to the City Centre and Central City Mixed Use Zones, means any part of any building that is below the maximum permitted height for that type of building in the zone.</p> <p>2. Amend rule as follows:</p> <table><tr><td></td><td>Applicable to</td><td>Standard</td></tr></table>		Applicable to	Standard
	Applicable to	Standard						

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought									
					<table><tr><td>i.</td><td>All buildings, except as provided for in ii, and iii and iv below.</td><td>A. The maximum height shall be <u>90 metres</u>. B. The maximum height of the building base shall be 28 metres. in accordance with the Central City Maximum Building Height planning map</td></tr><tr><td>ii.</td><td>All buildings in the <u>heritage setting of New Regent Street as identified in Appendix 9.3.7.2.</u></td><td>The minimum and maximum height shall be 8 metres.</td></tr><tr><td>iii.</td><td>All buildings at the Arts Centre, being land bordered by Montreal Street,</td><td>The maximum height shall be 16 metres.</td></tr></table>	i.	All buildings, except as provided for in ii, and iii and iv below.	A. The maximum height shall be <u>90 metres</u> . B. The maximum height of the building base shall be 28 metres. in accordance with the Central City Maximum Building Height planning map	ii.	All buildings in the <u>heritage setting of New Regent Street as identified in Appendix 9.3.7.2.</u>	The minimum and maximum height shall be 8 metres.	iii.	All buildings at the Arts Centre, being land bordered by Montreal Street,	The maximum height shall be 16 metres.
i.	All buildings, except as provided for in ii, and iii and iv below.	A. The maximum height shall be <u>90 metres</u> . B. The maximum height of the building base shall be 28 metres. in accordance with the Central City Maximum Building Height planning map												
ii.	All buildings in the <u>heritage setting of New Regent Street as identified in Appendix 9.3.7.2.</u>	The minimum and maximum height shall be 8 metres.												
iii.	All buildings at the Arts Centre, being land bordered by Montreal Street,	The maximum height shall be 16 metres.												

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought									
					<table><tr><td></td><td>Worcester Street, Rolleston Avenue and Hereford Street.</td><td></td></tr><tr><td><u>iv</u></td><td><u>All buildings within the Cathedral Square Height Precinct</u></td><td>A. The maximum height shall be 45 metres: B. The maximum height of the building base shall be 28 metres.</td></tr><tr><td><u>v.</u></td><td><u>All buildings within the Victoria Street Height Precinct</u></td><td>A. The maximum height shall be 45 metres. B. The maximum height of the building base shall be 28 metres.</td></tr></table>		Worcester Street, Rolleston Avenue and Hereford Street.		<u>iv</u>	<u>All buildings within the Cathedral Square Height Precinct</u>	A. The maximum height shall be 45 metres: B. The maximum height of the building base shall be 28 metres.	<u>v.</u>	<u>All buildings within the Victoria Street Height Precinct</u>	A. The maximum height shall be 45 metres. B. The maximum height of the building base shall be 28 metres.
	Worcester Street, Rolleston Avenue and Hereford Street.													
<u>iv</u>	<u>All buildings within the Cathedral Square Height Precinct</u>	A. The maximum height shall be 45 metres: B. The maximum height of the building base shall be 28 metres.												
<u>v.</u>	<u>All buildings within the Victoria Street Height Precinct</u>	A. The maximum height shall be 45 metres. B. The maximum height of the building base shall be 28 metres.												

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<div> <div>vi. <u>All buildings in the Central City Heritage Qualifying Matter and Precinct, including the following areas:</u></div> <div>...</div> <div>The maximum height shall be 28 metres.</div> </div>
171.	Central City Zone	Maximum Road Wall Height - 15.11.2.12 Building Tower Setbacks - 15.11.2.14 Maximum building tower dimension and building tower coverage – 15.11.2.15 15.11.2.16 Minimum building tower separation 15.11.2.17 Wind	Oppose	<p>These provisions, both individually and collectively act as proxies to restrict height and associated development capacity in the Central City Zone.</p> <p>The retention (and addition) of height rules in the City Centre zone simply does not give effect to the NPS-UD Policy 3 direction to “enable in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification.</p>	Delete all these provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>The proposed wind standards are inappropriate (as set between 4m/s to 6m/s more than 5% annually at ground level within 100m of a proposal.) The Technical data used in support of the provision identifies that measured wind levels already typically exceed these levels without development. There is no supporting s32 considering the benefits and costs associated with this provision.</p> <p><i>“Christchurch is a relatively windy city with a background mean wind speed of about 4 m/s (at 10 m above the ground). At the airport for example, the mean wind speed exceeds 4 m/s about 45% of the time, exceeds 6 m/s about 21% of time, and exceeds 8 m/s about 11% of the time”.¹</i></p>	
172.	Central City Mixed Use Zone	15.12.1.1(P16)(a)(iii)	Oppose	Delete as this matter is appropriately managed through	Amend rule by deleting clause (a)(iii).

¹ Technical Advice for Wind Assessments for Christchurch Cit. Meteorology Solutions (2022). [Section 2. Context]

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				screening and controls in Rule 15.12.2.5 'Screening'	
173.	Central City Mixed Use Zone	15.12.1.1(P16)(c)(iii)	Oppose	Requirement is seen as excessive within this context as these areas are not necessarily mutually exclusive.	Amend rule by deleting clause (c)(iii).
174.	Central City Mixed Use Zone	15.12.1.1(P16)(j)	Oppose	This requirement is seen as excessive within this context as a higher density of residential activity should be encouraged, with standards for outdoor and communal living space being used to provide appropriate levels of amenity.	Amend rule by deleting clause (j).
175.	Central City Mixed Use Zone	15.12.1.3(RD2) – Buildings	Oppose	Additional matters of discretion associated with Upper Floor Setbacks, and Glazing are unnecessary and not the more appropriate provisions.	Amend rule by deleting clauses (k) upper floor setbacks and (l) glazing.
176.	Central City Mixed Use Zone	15.12.1.3(RD4) – Four or more residential units	Oppose	Matters of discretion associated with Upper Floor Setbacks, and Glazing are unnecessary and not the more appropriate provisions. The matters in 15.5.1 are considered	Amend rule by deleting clauses (b) outdoor living space and (c) glazing.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				appropriately broad to ensure an appropriate balance between private, communal and public amenity.	
177.	Central City Mixed Use Zone	15.12.2.1 'Street scene, landscaping and trees'	Oppose	The proposed landscaping requirements are excessive and inappropriately reduce development opportunities. The operative plan rule is sought to be retained and PC14 amendments deleted.	Delete PC14 amendments and retain operative plan rule.
178.	Central City Mixed Use Zone	15.12.2.2	Support in part	<p>The maximum height of 32m is supported as being appropriately enabling within a proximate distance to the City Centre Zone.</p> <p>The restrictions associated with the rule are opposed as being unnecessary, in conjunction with the absence of clarity in the definition associated with 'building base' as discussed in this submission.</p>	<p>Amend the rule as follows:</p> <p>15.12.2.2 Maximum building height</p> <p>a. The maximum height of any building shall be in accordance with the height specified Unless identified on the Central City Maximum Building Height planning map <u>the maximum height of any building shall be 32 metres.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>b. The maximum height of any building base shall be 17 metres.</p> <p>b. Any application arising from this rule shall not be limited or publicly notified.</p>
179.	Central City Mixed Use Zone	15.12.2.7 – Minimum setback from the boundary	Oppose	It is considered that the inserted requirements are unnecessary, and unduly constraining.	Delete PC14 amendments and retain operative plan rule.
180.	Central City Mixed Use Zone	15.12.2.9 – Minimum number of floors	Oppose	Whilst a minimum requirement of two floor levels is appropriate in the zone to increase intensity of development, the zone provides for a wide variety of uses, not all of which are appropriate in multi-storey buildings. As such single storey buildings may well be appropriate in a mixed use environment.	Delete proposed rule.
181.	Central City Mixed Use Zone	15.12.2.10 – Building Setbacks	Oppose	Requirements associated with internal setbacks between building towers is unnecessary.	Amend the rule by deleting clauses (b) and (c).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
182.	Central City Mixed Use Zone	15.12.2.11 – Building Tower Coverage	Oppose	Considered unnecessary and would inappropriate disenable development capacity for no sound resource management purpose.	Delete the rule.
183.	Central City Mixed Use Zone	15.12.2.12 – Glazing	Oppose	Considered unnecessary and would inappropriate disenable development capacity for no sound resource management purpose	Delete the rule.
184.	Central City Mixed Use Zone (South Frame)	15.12.1.1(P13)(a)(iii)	Oppose	Delete as this matter is appropriately managed through screening and controls in Rule 15.12.2.5 'Screening'	Amend the rule by deleting clause (a)(iii).
185.	Central City Mixed Use Zone (South Frame)	15.12.1.1(P13)(d)(iii)	Oppose	Requirement is seen as excessive within this context as these areas are not necessarily mutually exclusive.	Amend the rule by deleting clause (d)(iii).
	Central City Mixed Use Zone (South Frame)	15.12.1.1(P13)(f)(g)(j)	Oppose	Increasing the extent of setbacks is not more appropriate within this context, revert to the operative Plan rule.	<ol style="list-style-type: none"> 1. Amend the rule by retaining the operative Plan wording for clause (f). 2. Delete clauses (g) and (j).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Clause (j) is seen as excessive within this context as a higher density of residential activity should be encouraged, with standards for outdoor and communal living space being used.	
186.	Central City Mixed Use Zone – South Frame	15.13.1.3(RD4)	Oppose	Assessment matters for Glazing and Outdoor Space are excessive and appropriate matters are contained within Provision 15.14.2.10.	Amend the rule by deleting clauses (b) – glazing and (c) – outlook.
187.	Central City Mixed Use Zone – South Frame	15.13.1.3(RD5)	Oppose	Assessment matters for Upper floor setbacks and glazing are excessive.	Amend the rule by deleting clauses (l) – upper floor setbacks and (m) – glazing.
188.	Central City Mixed Use Zone – South Frame	15.13.2.1	Support in part	<p>The maximum height of 32m is supported as being appropriately enabling within a proximate distance to the City Centre Zone.</p> <p>The restrictions associated with is opposed as unnecessary, in conjunction with the absence of clarity in the definition associated with ‘building base’</p>	<p>Delete the rule and replace as follows:</p> <p><u>The maximum height of all buildings shall be 32m.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				as discussed in this submission. The provision as associated with notification is sought to be consistent with that associated with the Central City – Mixed Use zone.	Retain clause (b).
189.	Central City Mixed Use Zone – South Frame	15.13.2.4(f) 'Street scene, landscaping and trees'	Oppose	The requirement for a minimum area of tree canopy of 4m ² is excessive and inappropriately, it reduces development opportunities.	Amend the rule by deleting the PC14 amendments and retaining the Operative Plan rule wording.
190.	Central City Mixed Use Zone – South Frame	15.13.2.10 – Building Tower Setbacks 15.13.2.11 – Building Tower Coverage 15.13.2.12 – Glazing	Oppose	Considered unnecessary and would reduce development capacity for no sound resource management purpose.	Delete rules 15.13.2.10 – tower setbacks, 15.13.2.11 – tower coverage, and 15.13.2.12 -glazing.
191.	Assessment Matters	15.14.3.1	Oppose	Additional assessment matters set out in clause (b) are unnecessary as the key issues are already addressed in clause (a), or are matters to be deleted	Delete clause (b), with the exception of clause (v) (subject to the below amendment): v. <u>The individual or cumulative</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				as a consequential amendment in association with the submission seeking the deletion of street wall, wind, and tower rules.	<u>effects of shading, visual bulk and dominance, and reflected heat from glass on sites in adjoining residential zones or on the character, quality and use of public open space and in particular the Ōtākaro Avon River corridor, Earthquake Memorial, Victoria Square and Cathedral Square;</u>
192.	Assessment Matters	15.14.3.35 – Upper Floor Setbacks 15.14.3.36 – height in Central City Mixed Use Zone 15.14.3.37 Glazing 15.14.3.38 Outdoor Spaces 15.14.3.39 Wind 15.14.3.40 – Comprehensive Residential Development in the Mixed Use Zones 15.14.5.3 City Spine Transport Corridor	Oppose	Additional controls are unnecessary, subjective and overly broad. These matters are all addressed by Rule 15.14.2.6 'Urban Design'. Deletion of the assessment matters sought as a consequential amendment associated with the submission seeking the deletion of the upper floor setback rule.	Delete the following assessment matters: 15.14.3.35 – upper floor setbacks 15.14.3.36 – height in Central City Mixed Use Zone 15.14.3.37 Glazing 15.14.3.38 Outdoor Spaces 15.14.3.39 Wind 15.14.3.40 – Comprehensive Residential Development in the Mixed Use Zones 15.14.5.3 City Spine Transport Corridor

Appendix 2: Metropolitan Centre Zone Rules

The following Metropolitan Centre Zone Rules set out proposed amendments sought from Kāinga Ora to Plan Change 14, to incorporate rules to enable the classification of Hornby, Papanui and Riccarton as Metropolitan Centre Zones

Proposed changes in zoning are highlighted in dark blue.

MCZ - Metropolitan Centre Zone

The Christchurch Metropolitan Centres are commercial centres with a focal point as sub-regional centres of Papanui, Riccarton and Hornby. They have a planned urban built environment that reflects a high density built form with high-quality public spaces. The Metropolitan Centre Zone provides for a diverse range of commercial, retail, community and recreational activities and offers a variety of employment and living opportunities.

The Metropolitan Centre Zone implements the National Policy Statement on Urban Development, by enabling a built form and density that reflects demand for housing and business use in sub-regional centres.

Activities and buildings along identified active street frontages interact with the streets and public spaces and contribute to a vibrant and attractive metropolitan centre. New buildings and development are well designed and reflect the high-quality urban environment.

Objectives
<p>MCZ-O1 Purpose of the Metropolitan Centre Zone</p> <p>The Metropolitan Centre Zone:</p> <ol style="list-style-type: none"> 1. Is Christchurch's secondary commercial, civic and community centres; and 2. Accommodates a wide range of commercial, community, recreational and residential activities.
<p>MCZ-O2 Planned urban built environment of the Metropolitan Centre Zone</p> <p>The planned urban built environment of the Metropolitan Centre Zone is characterised by:</p> <ol style="list-style-type: none"> 1. A built form that is compact and reflects the high-density environment of the Metropolitan Centre; 2. A built environment that is versatile, well designed and of high quality and contributes to attractive and safe public spaces; and 3. An urban environment that is an attractive place to live, work and visit.
Policies
<p>MCZ-P1 Appropriate activities</p> <p>Enable activities that are compatible with the purpose of the Metropolitan Centre Zone.</p>
<p>MCZ-P2 Location of residential activity</p> <p>Enable residential activity where:</p> <ol style="list-style-type: none"> 1. It is located above ground floor; and 2. It provides for an ongoing active street frontage with a positive interface with the public space.
<p>MCZ-P3 Health and well-being for residential activity</p> <p>Ensure residential activity and residential units achieve a healthy urban built environment that provides for people's amenity and well-being in respect of:</p> <ol style="list-style-type: none"> 1. Access to sunlight, daylight and outdoor living space; and 2. Privacy and site design.

<p>MCZ-P4 Other activities</p> <p>Provide for other activities within the Metropolitan Centre Zone where:</p> <ol style="list-style-type: none"> 1. Any significant adverse effects, can be avoided, remedied or mitigated; and 2. The activity is consistent with the planned urban built environment and purpose of the zone.
<p>MCZ-P5 Inappropriate activities</p> <p>Avoid activities that are incompatible with the purpose of the Metropolitan Centre Zone.</p>
<p>MCZ-P6 Small scale built development</p> <p>Enable repairs, alterations and additions to existing buildings and structures, and the erection of smaller-scale buildings and structures, that achieve the planned urban built environment for the Metropolitan Centre Zone.</p>
<p>MCZ-P7 Larger scale built development</p> <p>Provide for high-density development that achieves a quality built form, taking into consideration the following design objectives and the planned urban built environment of the zone.</p> <ol style="list-style-type: none"> 1. Buildings are well-designed and contribute to a high-quality vibrant public realm through visual interest and aesthetic coherence achieved through façade design, materials, and active edges; 2. Buildings abut the street edge and define and enclose the streets, and define the edges of open space; 3. Street corners are legible and enhanced through architectural treatment and form and maximised activity; 4. Pedestrian amenity is maximised through good permeability and activation, which contributes to safety and walkability; 5. Servicing and parking are subservient to the built form to maximise an attractive and active pedestrian interface at the street edge; 6. Servicing plant is integrated within the architectural design, to avoid an ‘add on’ appearance and ensure a well-designed top to buildings; 7. Residential activity is provided with a high quality living environment, including access to privacy, outlook, and sun access; 8. Development responds to the positive contextual elements (existing and potential) including neighbouring buildings, elements such as trees and crossing points in the street
<p>MCZ-P8 Public space interface</p> <p>Where located along an active street frontage identified on the planning maps, require development to provide a positive interface with the public space through:</p> <ol style="list-style-type: none"> 1. Buildings that are built up to the front boundary of the site; 2. Continuous active street frontages; 3. Verandas or other forms of pedestrian shelter; 4. Transparent glazing on the ground floor that allows visibility into and out of commercial frontages and reflects whether it is a primary or secondary frontage; 5. Obvious and highlighted public entrances; and 6. Visually unobtrusive parking, storage and servicing areas, preferably within or to the rear of the building.
<p>MCZ-P9 Car parking and parking lots</p> <p>Only allow for ground level car parking and parking lots where:</p> <ol style="list-style-type: none"> 1. It is not located along a primary frontage identified on the planning maps; and

2. Any adverse effects on the amenity and quality of the streetscape and public open spaces can be minimised.

Rules

MCZ-R1 New buildings and structures, and alterations, repairs and additions to existing buildings and structures

1. Activity status: **Permitted**

Where:

- a. The gross floor area of the new building, structure or addition to an existing building or structure is no more than 450m²; and
- b. Compliance is achieved with:
 - i. MCZ-S1;
 - ii. MCZ-S2;
 - iii. MCZ-S4; and
 - iv. MCZ-S5.

Except that:

MCZ-S1, MCZ-S4 and MCZ-S5 do not apply to alterations and repairs to existing buildings and structures.

2. Activity status: **Restricted discretionary**

Where:

- a. Compliance is not achieved with MCZ-R1-1.a.

Matters of discretion are restricted to:

1. The matters in MCZ-P7.

Notification:

An application under this rule is precluded from being publicly and limited notified in accordance with sections 95A and 95B of the RMA.

3. Activity status: **Restricted discretionary**

Where:

- a. Compliance is not achieved with MCZ-R1-1.b.

Matters of discretion are restricted to:

1. The matters of discretion of the infringed standard.

Notification:

An application under this rule where compliance is not achieved with MCZ-S2, MCZ-S3, MCZ-S4, or MCZ-S5 is precluded from being publicly

	notified in accordance with section 95A of the RMA.
MCZ-R2	Construction activity 1. Activity status: Permitted
MCZ-R3	Retail activity 1. Activity status: Permitted
MCZ-R4	Commercial service activity 1. Activity status: Permitted
MCZ-R5	Office 1. Activity status: Permitted
MCZ-R6	Entertainment activity 1. Activity status: Permitted
MCZ-R7	Recreation activity 1. Activity status: Permitted
MCZ-R8	Gymnasium 1. Activity status: Permitted
MCZ-R9	Food and beverage outlet 1. Activity status: Permitted
MCZ-R10	Healthcare activity 1. Activity status: Permitted
MCZ-R11	Educational facility 1. Activity status: Permitted
MCZ-R12	Community facility 1. Activity status: Permitted
MCZ-R13	Visitor accommodation 1. Activity status: Permitted
MCZ-R14	Residential activity including Papakāinga/Kāinga Nohoanga 1. Activity status: Permitted Where: a. Compliance is achieved with: i. MCZ-S3.
	2. Activity status: Restricted discretionary

	<p>Where:</p> <p>a. Compliance is not achieved with MCZ-S3.</p> <p>Matters of discretion are restricted to</p> <p>1. The matters of discretion of the infringed standard.</p> <p>Notification:</p> <p>An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</p>
	<p>MCZ-R15 Social Housing Complex</p> <p>1. Activity status: Permitted</p>
	<p>MCZ-R16 Community corrections activities</p> <p>1. Activity status: Permitted</p>
	<p>MCZ-R17 Conservation activity</p> <p>1. Activity status: Permitted</p>
	<p>MCZ-R18 Customary harvesting</p> <p>1. Activity status: Permitted</p>
	<p>MCZ-R19 Large format retail activity</p> <p>1. Activity status: Permitted</p>
	<p>MCZ-R20 Supermarket</p> <p>1. Activity status: Permitted</p>
	<p>MCZ-R21 Emergency service facility</p> <p>1. Activity status: Restricted discretionary</p> <p>Matters of discretion are restricted to:</p> <p>1. The matters in MCZ-P4.</p> <p>Notification:</p> <p>An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</p>
	<p>MCZ-R22 Retirement village</p> <p>1. Activity status: Restricted discretionary</p> <p>Matters of discretion are restricted to:</p> <p>1. The matters in MCZ-P4.</p>
	<p>MCZ-R23 Parking lot</p> <p>1. Activity status: Restricted discretionary</p>

	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. The matters in MCZ-P9. <p>Notification: An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA</p>
	<p>MCZ-R24 Trade supplier</p> <ol style="list-style-type: none"> 1. Activity status: Discretionary
	<p>MCZ-R25 Drive-through services</p> <ol style="list-style-type: none"> 1. Activity status: Permitted
	<p>MCZ-R26 Any activity not otherwise listed as permitted, restricted discretionary, discretionary or non-complying</p> <ol style="list-style-type: none"> 1. Activity status: Discretionary
	<p>MCZ-R27 Industrial activity</p> <ol style="list-style-type: none"> 1. Activity status: Non-complying
	<p>MCZ-R28 Primary production</p> <ol style="list-style-type: none"> 1. Activity status: Non-complying
	<p>MCZ-R29 Rural activities other than primary production</p> <ol style="list-style-type: none"> 1. Activity status: Non-complying

Standards	
MCZ-S1 Height	
<ol style="list-style-type: none"> 1. All buildings and structures must not exceed a maximum height above ground level of 53m. 	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. The location, design and appearance of the building or structure; 2. Loss of sunlight to adjacent public space; 3. Shading to surrounding buildings; 4. Shading and loss of privacy for any adjacent residential activity; 5. Wind effects on the safety and amenity of the adjacent public space; 6. The planned urban built environment; and 7. Whether an increase in building height results from a response to natural hazard mitigation.
MCZ-S2 Active street frontages	
<ol style="list-style-type: none"> 1. Along building lines identified on the planning maps all buildings must be built up to and oriented towards the identified building line and provide a veranda that: 	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. Whether the building promotes a positive interface with the street, community safety and visual interest; 2. Whether the building incorporates landscaping or other means to provide

<ul style="list-style-type: none"> a. Extends along the entire length of the building frontage; b. Provides continuous shelter with any adjoining veranda; and c. Has a minimum setback of 500mm from any kerb face. <p>2. For sites with primary street frontage controls identified in the planning maps:</p> <ul style="list-style-type: none"> a. At least 55% of the ground floor building frontage must be display windows or transparent glazing; and b. The principal public entrance to the building must be located on the front boundary. <p>3. For sites with secondary street frontage controls identified in the planning maps at least 35% of the ground floor building frontage must be display windows or transparent glazing.</p>	<p>increased amenity, shade and weather protection; and</p> <p>3. Whether topographical or other site constraints make compliance with the standard impractical.</p>
MCZ-S3 Location of residential units	
<p>1. All residential units must be located above ground floor.</p>	<p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> 1. The amenity and quality of the streetscape; 2. Whether the location of the residential units promote on the an active frontage, community safety and visual interest at the pedestrian level; and 3. Whether the design could facilitate conversion to commercial use so as not to foreclose future options.
MCZ-S4 Location of parking	
<p>1. Any on-site ground level car parking must be located within or at the rear of the building that it serves.</p>	<p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> 1. The amenity and quality of the streetscape.

MCZ-S5 Service areas and outdoor storage	
<p>1. Any on-site service area, including rubbish collection areas, and area for the outdoor storage of goods or materials must:</p> <ul style="list-style-type: none"> a. Be located to the rear of the building; and b. Without preventing the provision of a gate or entry point to the site, be fully screened by a 1.8m high fence or landscaping where it is visible from the road or any other public space. 	<p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> 1. The amenity and quality of the streetscape or public space; and 2. The service and storage needs of the activity.

Appendix 3: Maps

The following maps set out the height amendments sought from Kāinga Ora to Plan Change 14.

Noting that changes to the Residential Suburban and Residential Transition Zone and including the Lyttleton Port Residential Zone has not been shown here.

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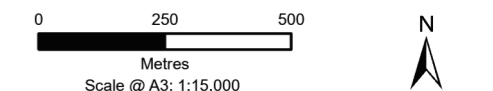
Plan Change 14

Kāinga Ora Submission

Papanui & Merivale

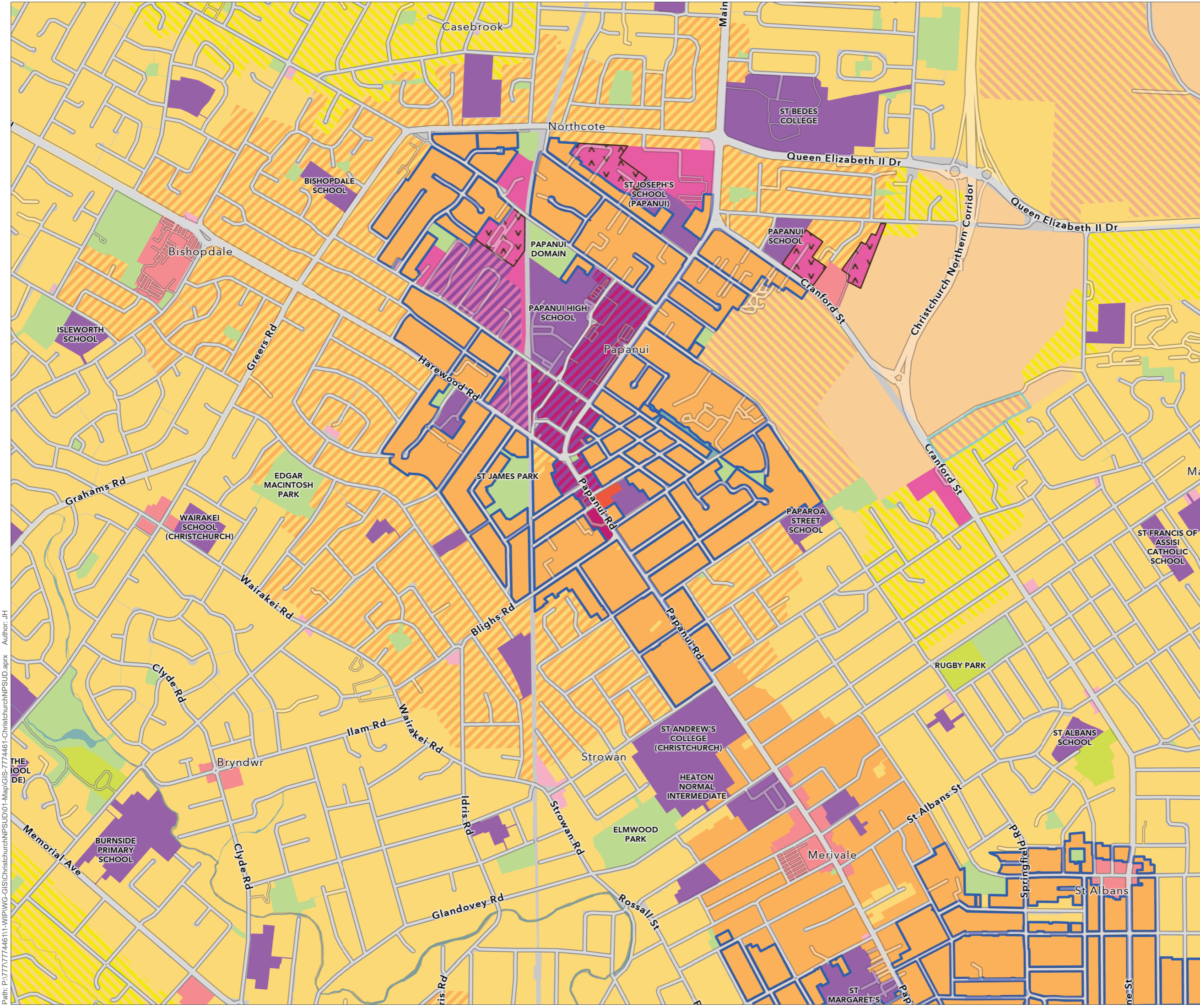
- Kāinga Ora Proposed HVC
- Height Variation Control - 36m
- Kāinga Ora Proposed Zoning
- Metropolitan Centre Zone
- High density residential zone
- Medium density residential zone
- PC14 Zoning
- Future Urban Zone
- High density residential zone
- Large format retail zone
- Local centre zone
- Medium density residential zone
- Neighbourhood centre zone
- Town centre zone
- Transport
- Specific Purpose
- Industrial General
- Rural Urban Fringe
- Residential Guest Accommodation
- Residential Medium Density
- Residential Suburban
- Residential Suburban Density Transition
- Open Space Community Parks
- Open Space Metropolitan Facilities
- Open Space Natural
- Open Space Water and Margins
- Residential New Neighbourhood
- Precinct
- Brownfield Precinct

This map contains data derived in part or wholly from sources other than Kāinga Ora, and therefore, no representations or warranties are made by Kāinga Ora as to the accuracy or completeness of this information. Contains information sourced from Hastings District Council, Hawkes Bay Regional Council, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS. Map intended for distribution as an A3 PDF document.



Revision	1.0
Status	FINAL
Author	JH
Verifier	LB
Date	12/05/2023

Project	Christchurch City Council PC14 Submissions
Client	Kāinga Ora
Discipline	GIS
Drawing No.	GIS-7774461-CCCPC14-01



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834

Christchurch City Council

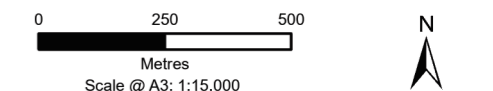
Plan Change 14

Kāinga Ora Submission

Hornby

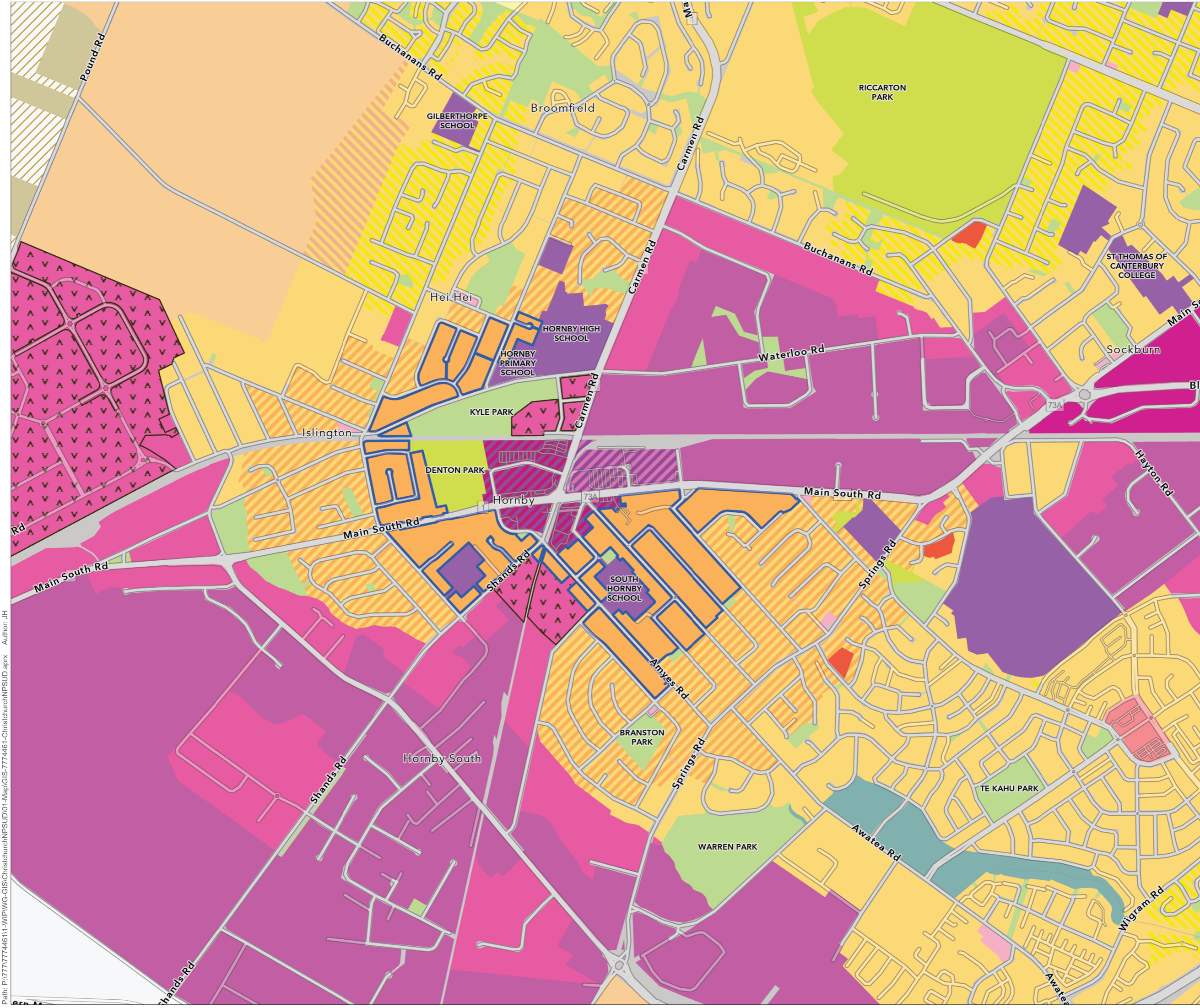
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- High density residential zone
- Large format retail zone
- Local centre zone
- Medium density residential zone
- Mixed use zone
- Neighbourhood centre zone
- Town centre zone
- Transport
- Specific Purpose
- Industrial General
- Industrial Heavy
- Industrial Park
- Rural Quarry
- Rural Quarry or Open Space Community Parks (Templeton)
- Rural Urban Fringe
- Residential Guest Accommodation
- Residential Suburban
- Residential Suburban Density Transition
- Open Space Community Parks
- Open Space Metropolitan Facilities
- Open Space Water and Margins
- Residential New Neighbourhood
- Precinct
- Brownfield Precinct

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Revision	1.0
Status	FINAL
Author	JH
Verifier	LB
Date	12/05/2023

Project	Christchurch City Council PC14 Submissions
Client	Kāinga Ora
Discipline	GIS
Drawing No.	GIS-7774461-CCCPC14-04



Path: P:\7777774461\1-WIP\WG-GIS\ChristchurchNPSUD\01-Map\GIS-7774461-ChristchurchNPSUD.aprx Author: JH

834

Christchurch City Council

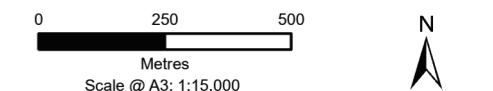
Plan Change 14

Kāinga Ora Submission

City Centre

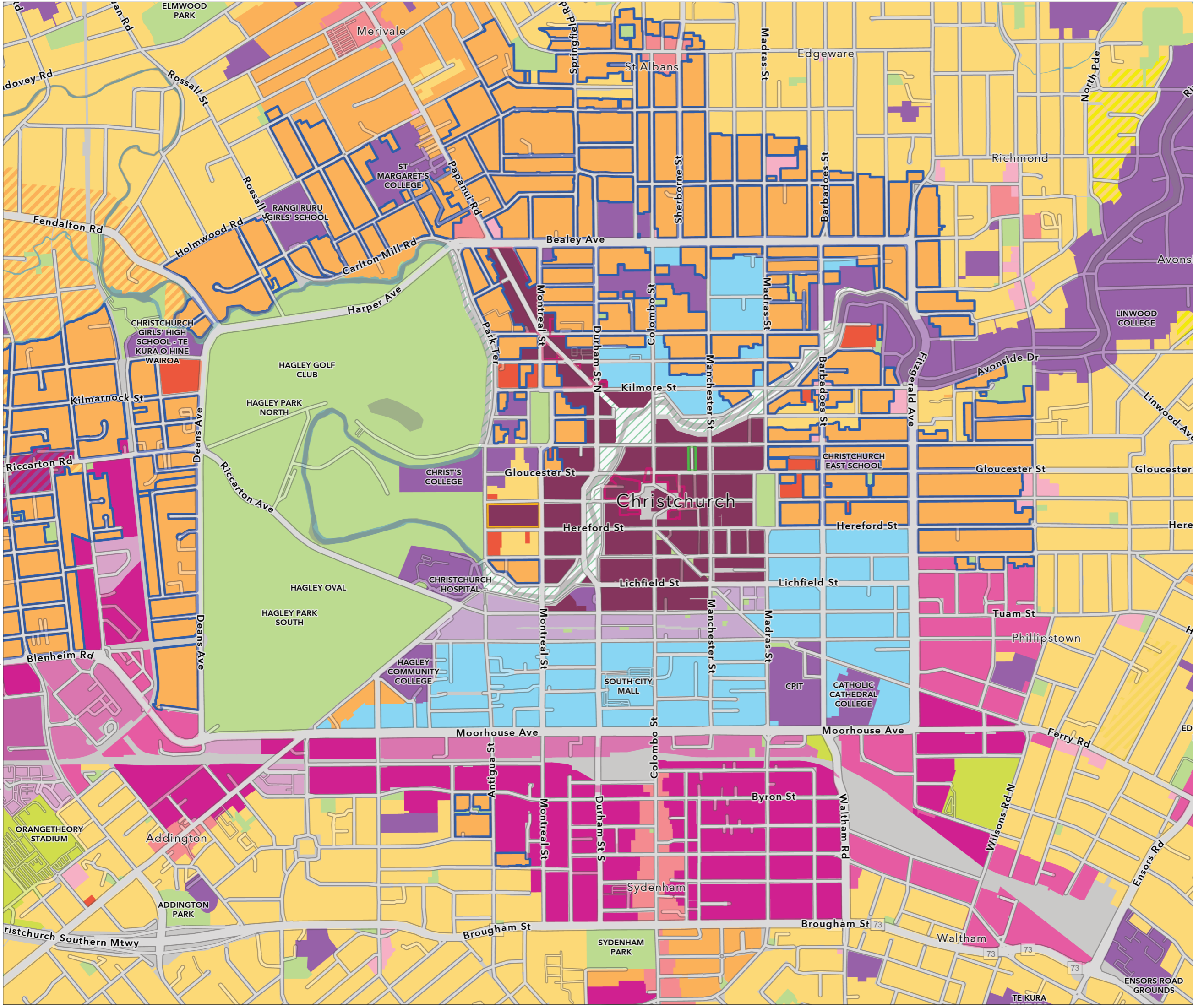
- Kāinga Ora Proposed HVC
- Height Variation Control - 36m
- Kāinga Ora Proposed Zoning
- Metropolitan Centre Zone
- High density residential zone
- Medium density residential zone
- PC14 Zoning
- Central City Mixed Use Zone
- Central City Mixed Use Zone (South Frame)
- City centre zone
- High density residential zone
- Large format retail zone
- Local centre zone
- Medium density residential zone
- Mixed use zone
- Neighbourhood centre zone
- Town centre zone
- Transport
- Specific Purpose
- Industrial General
- Industrial Heavy
- Residential Guest Accommodation
- Residential Medium Density
- Residential Suburban
- Residential Suburban Density Transition
- Open Space Community Parks
- Open Space Metropolitan Facilities
- Open Space Water and Margins
- Commercial Office
- Avon River Precinct (Te Papa Otakaro)
- Commercial Retail Park
- Precinct
- Art Centre Height Precinct
- Cathedral Square and Victoria Street Precinct
- New Regent Street Height Precinct

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Revision	1.0
Status	FINAL
Author	JH
Verifier	LB
Date	12/05/2023

Project	Christchurch City Council PC14 Submissions
Client	Kāinga Ora
Discipline	GIS
Drawing No.	GIS-7774461-CCCPC14-02



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834

Christchurch City Council

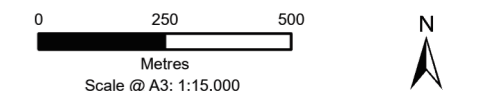
Plan Change 14

Kāinga Ora Submission

Riccarton

- Kāinga Ora Proposed HVC
- Height Variation Control - 36m
- Kāinga Ora Proposed Zoning
- Metropolitan Centre Zone
- High density residential zone
- Medium density residential zone
- PC14 Zoning
- Central City Mixed Use Zone
- High density residential zone
- Large format retail zone
- Local centre zone
- Medium density residential zone
- Mixed use zone
- Neighbourhood centre zone
- Town centre zone
- Transport
- Specific Purpose
- Industrial General
- Industrial Heavy
- Residential Guest Accommodation
- Residential Medium Density
- Residential Suburban
- Residential Suburban Density Transition
- Open Space Community Parks
- Open Space Metropolitan Facilities
- Open Space Natural
- Open Space Water and Margins
- Commercial Office

This map contains data derived in part or wholly from sources other than Kāinga Ora, and therefore, no representations or warranties are made by Kāinga Ora as to the accuracy or completeness of this information. Contains information sourced from Hastings District Council, Hawkes Bay Regional Council, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS. Map intended for distribution as an A3 PDF document.



Revision	1.0
Status	FINAL
Author	JH
Verifier	LB
Date	12/05/2023

Project	Christchurch City Council PC14 Submissions
Client	Kāinga Ora
Discipline	GIS
Drawing No.	GIS-7774461-CCPC14-01



Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details


Submission Date: 12/05/2023

First name: Lynne **Last name:** Lochhead

Organisation: Historic Places Canterbury

Preferred method of contact Email

Attached Documents

Name	
Submission on Plan changes 13 14	



Submission District Plan Changes: Plan Change 13 Heritage & Plan Change 14 Housing and Business Choice

Historic Places Canterbury (HPC), an independent regional society affiliated to Historic Places Aotearoa (HPA). Our objectives are the protection of heritage, providing local advocacy on heritage and promoting the education of the public in their appreciation of heritage values.

Plan Change 14

HPC accepts that it is desirable to contain urban growth by promoting intensification in order to keep our cities from encroaching further on versatile soils needed for the production of food and to ameliorate impacts on global warming by avoiding costly and inefficient extension of infrastructure by maximising the utility of existing infrastructure. We recognise that the Council is required to accept government direction around intensification. While addressing this issue is necessary, we believe that the approach conceived by central government, which gives a virtually blanket right to build multi-story dwellings on any existing titles, is clumsy. It disregards the many likely adverse consequences which will follow from ignoring principles of good planning and urban design and the benefits of local knowledge. HPC recognises that Plan Change 14 does its best to work within the constraints that have been imposed upon the Council by central directive. We are broadly supportive of the proposed changes. Points we strongly wish to support and any concerns which we have are outlined below.

Qualifying Matters

We strongly support all the proposed Qualifying Matters, but in particular those matters listed under Matters of National Importance (RMAs.6), including historic heritage; Public Open Space Areas; Residential Heritage Areas and Residential Character Areas; Sunlight Access; Riccarton Bush Interface; and the Otakaro Avon River Corridor. Although our concerns as a group relate primarily to heritage, we consider that many of the other qualifying matters such as the Tsunami Management Areas and Vacuum Sewer Wastewater Constraint and Low Public Transport Accessibility Areas are sensible qualifying matters which will help to protect quite large areas of the city from the random high density developments that will have adverse consequences in the longer term, and from our perspective, will also help to maintain their existing character.

Sunlight access

We fully support making sunlight access a qualifying matter so that recession planes can be adjusted to allow Christchurch developments under the MDRS to have the same amount of sunlight access as Auckland developments. Furthermore, we would argue that a similar amount of sunlight access to Auckland represents a bare minimum of what is acceptable because, with the lower temperatures experienced in Christchurch over winter, maximising sun access is a desirable objective not only to mitigate the need for greater energy use associated with heating but also to enhance health and well-being. In our view, no ground-floor sun for over 3 months of the year

seems a totally unsatisfactory standard, whether in Christchurch or Auckland.

Recession planes set at the level dictated by MDRS would result in overshadowing of existing buildings, making them less desirable and precipitating their replacement. This may be viewed by some as a positive, helping to speed up the pace of intensification, however it is worth recalling that demolition and construction are our second largest contributor to carbon outputs and account for approximately 40% of hard-fill waste. Adaptation of the existing housing stock, together with more sympathetic infill may ultimately be a better outcome for both people and the environment than the rather heedless rush to demolish and build multi-dwelling structures which the MDRS promotes. We would do well to heed the lessons to be learned from mistakes which other countries made in trying to meet post-war housing shortages by failing to take sufficient account of the importance of livability and amenity. It is a well documented fact that the most successful post-war housing programmes resulted from close consultation and collaboration with the communities that were being housed.

Tree Cover

Loss of tree canopy has been one of the notable features of intensification within the city to date and increased intensification can only lead to further loss despite the measures being proposed in mitigation. We support the plan's recognition of the importance of trees in mitigating the effects of global warming and providing other environmental benefits. We welcome the inclusion of scheduled trees as a qualifying matter and we believe that work to add to the scheduled list must be a high priority, given the ongoing loss of trees from the city. We also support updating of setbacks to better protect individual trees.

We support all efforts to incentivise tree planting, including the canopy cover requirements relating to development and subdivision consents. We also support the proposal to require financial contributions to allow mitigating planting on council owned land where the required tree-canopy cover, through either retention of existing trees or new planting, has not been met. However, while additional planting on Council-owned land is highly desirable, that can never fully compensate for the loss of tree cover and consequent loss of amenity in the areas affected by intensification. Even where sufficient trees are planted to meet the canopy rules, it will be years before a young tree can provide the environmental benefits and the amenity for people that mature trees provide. In fact, HPC has some concerns that the financial contribution provision may prove to be a bit of a double edged sword. It would be unfortunate if a well-meaning provision was used to provide an easy out for developers to pay up rather than seek to protect existing trees through clever design. Removal of mature trees needs to be seen as a last resort. There is a need for the Council to work much more closely with developers to overcome the clean-slate mindset which seems to prevail at present and the financial contribution need to be set at a level sufficient to discourage this clean-slate approach.

Even where mature trees are retained, it is vital to ensure that this will not just be for long enough to obtain the desired resource consent, only to have the trees die or require removal a few years down the track. All too often around the city large trees are seen to be dying back because they have suffered unsustainable root damage during construction nearby. While the rules make provision for providing sufficient soil volume and tree root dimensions for the tree's requirements and provide for maintenance of the trees or removal and replacement of any that are damaged, it is not clear how this will, in practice, be monitored.

Height

We acknowledge that it is sensible and appropriate to concentrate the highest density in the central city with further centres of both residential and commercial density concentrating around the

biggest outlying commercial hubs which are well served by public transport, gradually reducing to neighbourhood hubs. However, we have real concerns about the extent of the 90 metre central city zone. We note below that it adjoins 11 metre zones in some places and 32 metre zones in many places. We believe there is a need for a more graduated height around the boundaries of the 90 metre zone.

We strongly support the lower heights proposed adjacent to New Regent Street, The Arts Centre and Cathedral Square. However we are concerned that Hagley Park has not been given similar protection despite the fact that the Hagley Park Management Plan 2007 states as an objective, the investigation of a conservation buffer zone around the park to protect the integrity of its visual landscape. Tall buildings on land adjacent to the perimeter are recognised as a threat to the character of Hagley Park. It is disappointing that this has not been taken into account in setting the height limits around the park which, at 32 meters along Park Terrace, greatly exceed the previous limit of 14 metres. HPC believes that lower heights also need to be implemented adjacent to Cranmer and Latimer Squares, both of which are also scheduled heritage items. The proposed heights would allow 90 metres to the west of Latimer Square and 32 metres around Cranmer Square and to the east of Latimer Square. The 90 metre height limit is particularly concerning, though in reality it is probably unlikely to have any impact in the short term given the number of new buildings around the Square. We note that a Riccarton Bush Interface Area has been defined as a qualifying matter to protect the heritage landscape of Riccarton Bush, which we fully support. We acknowledge that this is a slightly different case as the interface area is vital to protect views to the bush from surrounding streets. Creating a Qualifying Interface Area may be a more flexible means of providing a buffer for the heritage areas of Hagley Park, Cranmer Square and Latimer Square than adjusting the height limits around them. We believe that it is important that some mechanism be put in place to protect their heritage values, their open space landscape values and the views outwards from within those spaces.

Plan Change 13

HPC supports the proposed simplification and clarification of the rules for heritage to help make them more workable, effective and easily understood. We also fully support the proposed addition of sites and interiors to the heritage schedule, including the upgrading of some listings. We are pleased to note that some of our recommended additional listings have now been included in the proposed change. We note that others are under investigation but have not been included because of time constraints in completing the necessary investigations. We acknowledge that thorough investigation is essential and support the continuation of this work. We hope, in due course, to see listing of the Barnett Avenue Pensioner Cottages, the Upper Riccarton War Memorial Library, The Princess Margaret Hospital and the former High Court, for all of which we have previously submitted supporting information.

We commend the commitment of the Council to providing interior protection for scheduled buildings and recognise that this is an ongoing process. It is pleasing that 26 interiors are proposed to be added to the schedule in this plan change

Paragraph 3.3.15 of the s. 32 Report states that the owners of Daresbury (Highly Significant) and 32 Armagh St (Significant) wish to have their buildings removed from the Heritage Schedule. HPC is strongly opposed to this. Daresbury is a major building in the English Domestic Revival style by Samuel Hurst Seagar, one of Christchurch's most significant architects. Not only is it one of Seagar's finest buildings, it has important cultural associations including as the residence of the Governor General from 1940-50. A number of significant large scale domestic buildings by Seagar were lost in the earthquakes, making it all the more important that Daresbury should continue to be listed. Daresbury, it should be noted, is a category 1 item on the Heritage New Zealand list.

Though 32 Armagh is only scheduled as Significant we believe it is important that this building should also be retained on the list, especially as it forms part of the Inner City West Residential Heritage Area. It is

indicative of the mixed range of dwelling in the area. It is a survivor of a more modest style of house from an earlier period before the area became dominated by larger two storey gentleman's residences dating from the end of the 19th century through to the early 20th century. It forms a clear contrast in scale and architectural pretension to the much grander, architecturally designed "Orari" on the opposite side of Gloucester Street.

Residential Heritage Areas

We welcome the addition of 11 Residential Heritage areas and their inclusion as Qualifying Matters. We note that where a High Density Residential Zone or a Residential Visitor Accommodation Zone adjoins a Residential Heritage Area, provision has been made to assess the impact of a proposed building's location, design, scale and form on heritage values or whether it would visually dominate or reduce the visibility of the site from a road or other public space.

(9.3.6.6) It is unclear to us from the wording whether the emphasis is on the fact of a site sharing a boundary or the zone sharing the boundary. It appears from the s. 32 report that it refers to a site sharing a boundary and that sites separated by a road are not captured by this rule because such sites "will generally have reduced dominance effects due to their separation distance". We consider that this assumption is questionable. The potential for visual dominance will be affected both by the width of the the carriageway and also by the relationship between relative heights of adjoining zones. Furthermore, if High Density Residential sites are considered to have the potential for causing significant visual dominance effects, then this must hold even more true between a Residential Heritage Area and the Central City Zone with an allowable height of 90m. This zone adjoins part of the the Inner City West Residential Heritage area and though they do not "share a boundary" at any point because the two zones are separated by Montreal Street, there can be little doubt that the width of the street would not give sufficient separation to avoid visual domination of a 90m building over an 11m building. In our opinion, these rules need refinement.

Residential Character Areas

HPC welcomes the addition of three new character areas and while we regret the removal of two character areas in Sumner and the reduction in size of 7 of the existing character areas, we recognise that these no longer meet the criteria and should therefore be removed or require boundary adjustments. We welcome the inclusion of Residential Character Areas as a Qualifying matter and the introduction of restricted discretionary status to help better manage and protect character areas. We also support more restrictive subdivision for character areas.

Rules relating to demolition of scheduled heritage items

HPC is concerned that the rules around consent to demolish contain no acknowledgement of the waste generated through demolition, or the carbon retention benefits of embodied energy within buildings. While the rules provide for consideration to be paid to the costs of retention for the landowner, there is no recognition that the carbon costs or benefits should also form part of the decision making process, despite the Council's stated commitment to achieving carbon neutrality by 2045. It is our contention that the carbon impact of granting a demolition consent needs to be factored into the decision making process and that the rules should be amended accordingly. Owners should also be required to provide information on the cost of demolition to allow a fairer assessment of the cost to them of retaining a listed building.

Arguably all new developments should be required to undertake a 'whole of life' energy consumption and carbon emission audit.

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

16/05/2023

First name:

Andrew


Last name:

James Kerr

Preferred method of contact

Postal

Attached Documents

Name	
Andrew James Kerr	

Have your say

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

RECEIVED

12 MAY 2023

Clause 6 of Schedule 1 Resource Management Act 1991

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

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

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

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

* Required information

Name* ANDREW JAMES KEAR

Address* 57 WATFORD ST. STROMAN CHRISTCHURCH Postcode* 8052

Email jimkear49@extra.co.nz Phone no. 027 4426803

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

Organisation's name _____

Your role _____

Trade competition and adverse effects* (select appropriate)

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

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

(a) adversely affects the environment, and

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

☐ Yes ☐ No

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

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

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

☒ I wish to speak in support of my submission on Plan Change 14

☐ I do not wish to speak.

Joint submissions (Please tick this box if you agree)

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

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

☒ Yes, I have attached extra sheets.

☐ No, I have not attached extra sheets.

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

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

Signature 

Date 7/5/23

Have your say

Housing and Business Choice Plan Change 14

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

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

SEE ATTACHED : APPENDIX A.

My submission is that:*

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

SEE ATTACHED : APPENDIX A

I seek the following decision from the Council:*

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

SEE ATTACHED : APPENDIX A

Submission to Christchurch City Council

Regarding Christchurch District Plan

Plan Change 14

As a resident of Strowan for over 30 years I wish to express my very real concerns to the proposed Housing and Business Choice Plan Change 14 (PC14). My objection is based on the additional pressure any such High Density Development would have on current infrastructure – transport, storm and waste water system, lack of consideration re parking requirements (street parking is already a real problem in this area) and the long term impact on our neighbourhood. Strowan is a special community with classic character and quality homes. I believe the proposed change to introduce a High Density Residential Zone will impact negatively on our environment, family home asset and lifestyle. Of particular concern is the continuous strip parallel to Papanui Road through Strowan stretching from Papanui Road to Watford Street.

1. INFRASTRUCTURE

Section 14.2.8.5 Policy – Infrastructure servicing for developments.

The plan states the Council will “*Ensure that developments are serviced with all required infrastructure in an effective and efficient manner*”.

Currently the infrastructure is struggling.

Frequent flooding in streets indicate water and storm water issues.

Parking and traffic congestion is diabolical during morning and afternoon school hours or school weekend events. It is often very difficult to get out of own driveway into our street.

There was a significant amount of liquefaction in this particular area following the earthquakes and to my knowledge this has never been alleviated.

Section 14.2.8.6 Policy – Integration and connectivity

The plan intends to “*Avoid significant adverse effects and remedy or mitigate other adverse effects on existing businesses, rural activities or infrastructure.*”

My concern is the long term negative impact potential high density development will have on the nature and special character of our neighbourhood and community. It is already very busy with a schools tennis club and shopping centre and Normans Road is widely used as thoroughfare to Riccarton and other suburbs. Any further development will aggravate the current congestion.

Section 14.6.2 Built form standards

The Council suggests “*The following built form standards shall be met by all permitted activities and restricted discretionary activities RD2, unless otherwise stated*”.

As stated previously the current infrastructure system is ineffective. Increasing development and increasing hard surfaces will intensify flooding problems as the land is not coping now.

2. AMENITY/CHARACTER

Section 14.2.4.2 Policy – High quality, medium density residential development

The plan will *"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."*

Strowan is already a very attractive and popular family oriented community neighbourhood.

The quality of homes and environmental outlook appeals to families and they tend to stay for long periods of time. I suggest by increasing the housing through High Density Residential Zoning will only jeopardize the community spirit and focus Strowan currently offers.

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

Section 7.2.1.2 Policy – High trip generating activities *"Provide for the transport needs of people whose mobility is restricted"*

Section 7.2.1.5 Policy – Design of Carparking areas and loading areas *"Be accessible for people whose mobility is restricted"*.

The proposed plan does not make provision for additional parking regardless of personal circumstances. If high density development are implemented everyone will be disadvantaged by the imposed parking limitations.

Parking is already a significant issue and should be prioritised for review before any consideration is given to further development.

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

Section 14.2.7 Objective – High Density Residential Zone *"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 *"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."*

We attended a local meeting in Papanui when this plan was first being mooted. At the time we understood our suburb would not be impacted by High or Medium density development.

Conclusion/Recommendation

I reiterate my concerns regarding the implications of any potential High Density development within the Strowan area particularly between Papanui and Watford Street and respectfully request the Council to seriously reconsider how this will be classified.

Thank you for your understanding.

Andrew James Kerr

57 Watford Street

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Sylvia


Last name:

Maclaren

Preferred method of contact

Email

Attached Documents

Name	
Sylvia	

Robson, Gina

From: Generation Zero <noreply@123formbuilder.com>
Sent: Friday, 12 May 2023 2:21 pm
To: Engagement
Subject: CCC District Plan Changes (PC14) - Generation Zero Quick Submit / 531

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

Form Summary

1. First / Last name	Sylvia Maclaren
2. Email address	sylvia.maclaren@gmail.com
3. Postal Address	2 Tuscany Place Beckenham Christchurch 8023
4. Trade competition/adverse effects:	Option 1: I could not gain in trade competition through this submission
5. Answer if you selected option 2 above:	Are you directly affected by a possible effect of this plan change in a way that it: a. adversely affects the environment, and b. does not relate to the trade competition or the effects of trade competitions
Chapter 6 - Tree Canopy Cover and Financial Contributions	<p>The council will require 20% of new residential developments to be covered by trees, or otherwise pay a financial contribution to help the council plant more trees on public land. Christchurch has an appallingly low tree canopy cover rate of 13% compared to Auckland (18%) and Wellington (30%). Trees have a wide range of environmental, health, social and economic benefits and are important for the future of our city.</p> <p>I support the Tree Canopy Cover rules and Financial Contributions to restore our tree canopy. Trees are important in reducing emissions,</p>

Form Summary

providing shade and temperature control in the summer, alongside the other wide range of economic, health and social effects. I seek that the council retains the tree canopy requirement and contributions plan.

Chapter 14 - Low Public Transport Accessibility Area Qualifying Matter

The council plans to restrict housing in some areas of the city because they are poorly serviced by the lack of current high frequency public transport routes. Some areas solely designated with this qualifying matter such as in Casebrook and Styx are close to rail corridors, existing commercial areas and are serviced by low frequency routes. In the future, these areas could see a boost in service by more buses on current routes or introduction of a commuter rail service.

I oppose the Low Public Transport Accessibility Area Qualifying Matter as I believe that the public transport layout and network will need changes to prepare and accommodate future growth. We should not define future growth in Christchurch based on these routes. This would also artificially limit future housing in our city. I seek that the council drop this qualifying matter.

Chapter 14 - Sunlight Access Qualifying Matter

There are many cities in the world that have high density and are further from the equator than Christchurch. Cities such as Vienna, Copenhagen, Toronto, Geneva, and Calgary are consistently ranked some of the most livable cities in the world. This qualifying matter would reduce the maximum height and size of medium residential buildings below what is legally required. This qualifying matter has been developed with the expressed purpose of protecting and increasing property values rather than increasing the amount of affordable housing for people.

I oppose the Sunlight Access Qualifying Matter. There are many cities in the Northern Hemisphere that are further away from the equator and have a higher level of housing intensification than Christchurch. With a mix of medium and high density housing, these cities are considered some of the most livable cities in the world. This qualifying matter would restrict medium density housing height and size in such a way that would create a less efficient usage of land and limit future housing. I seek that the council drop this qualifying matter.

Chapter 14 - High-Density Residential Zone

The council is required by law to allow residential buildings of at least 6 storeys within a 1.2km radius of commercial centres such as malls and the city centre. The council plan to enable this, while also allowing up to 10 storeys for residential buildings closer to the city centre. This would enable a wider range of dense housing development options. It would also allow more people to live close to services and amenities.

I support high-density housing near the city and commercial centres. We need to allow more people to live near services and amenities to reduce car dependency. This would allow more people to take active and public transport to commute, shop and play. I seek that the council enable 6 to 10 storeys for residential buildings near commercial centres.

Form Summary**Any other comments?**

The message has been sent from 118.149.78.67 nz at 2023-05-12 on Chrome 113.0.0.0

Entry ID: 198

Referrer: android-app://com.google.android.gm/

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

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 11/05/2023

First name: Georgie

Last name: McLaughlin

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

HRZ on Watford St and Strowan area to be changed to a Medium Residential Zone.

My submission is that:

I do not support the change of Watford St, Strowan (Halton St, Hawthorne, Watford St and Normans Rd) becoming a high residential zone and seek the council to review this and change to MRZ due to the following:

- The Strowan area has existing significant infrastructure issues which pose a heightened health and safety risk if a MRZ or HRZ (including carparking, vehicle congestion, flooding issues which impact both stormwater and wastewater systems).
- As it is Watford St and surrounding streets are already highly congested with traffic and car parking issues due to the close proximity of St. Andrews College (1,700 students, 250 teachers) and the Waimairi Tennis Club (at peak over the summer period Monday-Sunday). Any increase in housing density in the Strowan community (that is either MRZ or HRZ) will magnify this existing, on-street carparking problem and traffic congestion. Of particular concern is that the PC14 proposes to enable HRZ along Papanui Road and one block either side of Papanui Road which is obviously at a higher level of intensification than even MRZ. As there is little on-street carparking in the area, and no on-site carparking required for new residential developments, carparking associated with ALL of this intensification will further exacerbate the carparking and traffic issues in the Strowan community.
- This also presents a health and safety issue in an area which has many young families and school children present - due to increased traffic congestion, cars double parking and parking over driveways particularly during peak times which would be further exemplified by a HRZ. A public transport system would not solve this problem.
- There are already pockets of significant flooding in rainfall events in Strowan – with Brenchley Avenue being one example where both the stormwater and wastewater networks do not cope in these events. Areas of Watford St are also considered a high flood zone with a high water table. HRZ intensification of the extent proposed in PC14 will exacerbate this across the neighbourhood. This is a known consequence of urban intensification in Christchurch (and elsewhere – recent Auckland flooding).
- The wide streets and traditional style homes make the area unique are special to the residents. Some homes being +100 years old - this history and uniqueness can't and shouldn't be replaced. The area has a number of prominent trees and landscaping on properties which supports the Council's Urban Forest Plan 2023 initiative.
- 'Section 14.2.7 Objective – High Density Residential Zone: a High density residential development near larger commercial centres, commensurate with the expected demand for housing in these areas and the nature and scale of commercial activities, community facilities, and multimodal transport networks planned or provided in the commercial centres'. Strowan does not meet the above criteria (it is not located near a commercial centre).

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Jacinta


Last name:

O'Reilly

Preferred method of contact

Email

Attached Documents

Name	
Jacinta	

Robson, Gina

From: Generation Zero <noreply@123formbuilder.com>
Sent: Friday, 12 May 2023 2:14 pm
To: Engagement
Subject: CCC District Plan Changes (PC14) - Generation Zero Quick Submit / 531

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

Form Summary

1. First / Last name	Jacinta O'Reilly
2. Email address	jacinta_o@yahoo.com
3. Postal Address	57 Winton Street Christchurch 8014
4. Trade competition/adverse effects:	Option 1: I could not gain in trade competition through this submission
5. Answer if you selected option 2 above:	Are you directly affected by a possible effect of this plan change in a way that it: a. adversely affects the environment, and b. does not relate to the trade competition or the effects of trade competitions
Chapter 6 - Tree Canopy Cover and Financial Contributions	<p>The council will require 20% of new residential developments to be covered by trees, or otherwise pay a financial contribution to help the council plant more trees on public land. Christchurch has an appallingly low tree canopy cover rate of 13% compared to Auckland (18%) and Wellington (30%). Trees have a wide range of environmental, health, social and economic benefits and are important for the future of our city.</p> <p>I support the Tree Canopy Cover rules and Financial Contributions to restore our tree canopy. Trees are important in reducing emissions,</p>

Form Summary

providing shade and temperature control in the summer, alongside the other wide range of economic, health and social effects. I seek that the council retains the tree canopy requirement and contributions plan.

Chapter 14 - Low Public Transport Accessibility Area Qualifying Matter

The council plans to restrict housing in some areas of the city because they are poorly serviced by the lack of current high frequency public transport routes. Some areas solely designated with this qualifying matter such as in Casebrook and Styx are close to rail corridors, existing commercial areas and are serviced by low frequency routes. In the future, these areas could see a boost in service by more buses on current routes or introduction of a commuter rail service.

I oppose the Low Public Transport Accessibility Area Qualifying Matter as I believe that the public transport layout and network will need changes to prepare and accommodate future growth. We should not define future growth in Christchurch based on these routes. This would also artificially limit future housing in our city. I seek that the council drop this qualifying matter.

Chapter 14 - Sunlight Access Qualifying Matter

There are many cities in the world that have high density and are further from the equator than Christchurch. Cities such as Vienna, Copenhagen, Toronto, Geneva, and Calgary are consistently ranked some of the most livable cities in the world. This qualifying matter would reduce the maximum height and size of medium residential buildings below what is legally required. This qualifying matter has been developed with the expressed purpose of protecting and increasing property values rather than increasing the amount of affordable housing for people.

I oppose the Sunlight Access Qualifying Matter. There are many cities in the Northern Hemisphere that are further away from the equator and have a higher level of housing intensification than Christchurch. With a mix of medium and high density housing, these cities are considered some of the most livable cities in the world. This qualifying matter would restrict medium density housing height and size in such a way that would create a less efficient usage of land and limit future housing. I seek that the council drop this qualifying matter.

Chapter 14 - High-Density Residential Zone

The council is required by law to allow residential buildings of at least 6 storeys within a 1.2km radius of commercial centres such as malls and the city centre. The council plan to enable this, while also allowing up to 10 storeys for residential buildings closer to the city centre. This would enable a wider range of dense housing development options. It would also allow more people to live close to services and amenities.

I support high-density housing near the city and commercial centres. We need to allow more people to live near services and amenities to reduce car dependency. This would allow more people to take active and public transport to commute, shop and play. I seek that the council enable 6 to 10 storeys for residential buildings near commercial centres.

Form Summary**Any other comments?**

The message has been sent from 151.210.173.53 nz at 2023-05-12 on Chrome 113.0.0.0

Entry ID: 197

Referrer: <https://l.facebook.com/>

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

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Rosa


Last name:

Shaw

Preferred method of contact

Email

Attached Documents

Name	
Rosa	

Robson, Gina

From: Generation Zero <noreply@123formbuilder.com>
Sent: Friday, 12 May 2023 8:00 pm
To: Engagement
Subject: CCC District Plan Changes (PC14) - Generation Zero Quick Submit / 531

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

Form Summary

1. First / Last name	Rosa Shaw
2. Email address	rosa.shaw177@gmail.com
3. Postal Address	28 Mt Thomas Rd Rangiora 7471
4. Trade competition/adverse effects:	Option 1: I could not gain in trade competition through this submission
5. Answer if you selected option 2 above:	Are you directly affected by a possible effect of this plan change in a way that it: a. adversely affects the environment, and b. does not relate to the trade competition or the effects of trade competitions
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Form Summary

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Form Summary**Any other comments?**

The message has been sent from 161.65.230.245 nz at 2023-05-12 on Chrome 113.0.0.0

Entry ID: 202

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

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

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:


Jess

Last name:

Gaisford

Preferred method of contact

Attached Documents

Name	
Jess	

Robson, Gina

From: Generation Zero <noreply@123formbuilder.com>
Sent: Friday, 12 May 2023 10:41 pm
To: Engagement
Subject: CCC District Plan Changes (PC14) - Generation Zero Quick Submit / 531

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

Form Summary

1. First / Last name	Jess Gaisford
2. Email address	jessgaisford@gmail.com
3. Postal Address	57 Kibblewhite Street New Brighton 8061
4. Trade competition/adverse effects:	Option 1: I could not gain in trade competition through this submission
5. Answer if you selected option 2 above:	Are you directly affected by a possible effect of this plan change in a way that it: a. adversely affects the environment, and b. does not relate to the trade competition or the effects of trade competitions
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Form Summary**Any other comments?**

The message has been sent from 163.47.236.64 nz at 2023-05-12 on Chrome 112.0.0.0

Entry ID: 205

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

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

Submitter Details

Preferred method of contact	Email
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Attached Documents

Name
Fire and Emergency Submission - Christchurch City Council - Proposed Plan Change 13 and14

Submission on notified Proposed Heritage Plan Change (PC13) and Proposed Housing and Business Choice Plan Change (PC14)

Intensification Streamlined Planning Process (ISPP)

To: Christchurch City Council

Name of Submitter: Fire and Emergency New Zealand

This submission is made on behalf of Fire and Emergency New Zealand (Fire and Emergency) to Christchurch City Council (CCC) on the Proposed Heritage Plan Change (PC13) and Proposed Housing and Business Choice Plan Change (PC14).

1.1 Context

The primary objective of Fire and Emergency is to reduce the incidence of unwanted fire and the associated risk to life and property. Fire and Emergency seek to:

- protect and preserve life; and
- prevent or limit injury; and
- prevent or limit damage to property and land; and
- prevent or limit damage to the environment¹.

Fire and Emergency's main functions² are –

- (a) to promote fire safety, including providing guidance on the safe use of fire as a land management tool; and
- (b) to provide fire prevention, response, and suppression services; and
- (c) to stabilise or render safe incidents that involve hazardous substances; and
- (d) to provide for the safety of persons and property endangered by incidents involving hazardous substances; and
- (e) to rescue persons who are trapped as a result of transport accidents or other incidents; and
- (f) to provide urban search and rescue services.

Fire and Emergency also has secondary functions to assist in matters to the extent that Fire and Emergency has the capability and capacity to do so and the capability to perform their main functions efficiently and effectively. These secondary functions³ are:

- (a) responding to medical emergencies; and

¹ Fire and Emergency New Zealand Act 2017 section 10(a)(b)

² Fire and Emergency New Zealand Act 2017 section 11(2)

³ Fire and Emergency New Zealand Act 2017 section 12(3)

- (b) responding to maritime incidents; and
- (c) performing rescues, including high angle line rescues, rescues from collapsed buildings, rescues from confined spaces, rescues from unrespirable and explosive atmospheres, swift water rescues, and animal rescues; and
- (d) providing assistance at transport accidents (for example, crash scene cordoning and traffic control); and
- (e) responding to severe weather-related events, natural hazard events, and disasters; and
- (f) responding to incidents in which a substance other than a hazardous substance presents a risk to people, property, or the environment; and
- (g) promoting safe handling, labelling, signage, storage, and transportation of hazardous substances; and
- (h) responding to any other situation, if Fire and Emergency has the capability to assist; and
- (i) any other function conferred on Fire and Emergency as an additional function by the Minister in accordance with section 112 of the Crown Entities Act 2004.

With the wider mandate and changing nature of Fire and Emergency response, the volume of incidents that Fire and Emergency responds to has grown, as has the range of incident types.⁴

On average, Fire and Emergency attend 5,917⁵ incidents annually across Christchurch. This includes an average of:

- 1,317 fires,
- 896 medical emergencies,
- 583 vehicle accidents,
- 419 rescues and public assists⁶, and
- 2,645 HAZMAT/Heat/Pressure/Electrical hazard, false alarms and other emergencies.

Fire and Emergency also face broad challenges, such as the increasing frequency and severity of extreme weather events associated with climate change, increasing intensification of urban areas, and competing access to resources such as water and transport infrastructure. These challenges make the environment Fire and Emergency operates in more complex and puts greater demands on Fire and Emergency as an organisation.

Territorial authorities have a role in ensuring that emergency service providers, such as Fire and Emergency, can continue to operate effectively and efficiently in a changing urban environment. This includes consideration and management of the actual and potential implications on emergency services when giving effect to the National Policy Statement on Urban Development 2020 (NPS-UD), and the Resource Management (Enabling Housing Supply and Other Matters) Act 2021 (Enabling Act).

Fire and Emergency note that Policy 1 of the NPS-UD seeks planning decisions contribute to well-functioning urban environments, which includes urban environments that, as a minimum, have good accessibility and are resilient to the likely current and future effects of climate change. Further, the management of significant risks for natural hazards is a matter of national importance under section 6 of the

⁴ There is an increasing need to respond to a wide range of non-fire emergencies, where Fire and Emergency often coordinate with and assist other emergency services. These include responding to motor vehicle accidents, medical call-outs, technical rescues, hazardous substance incidents such as gas or chemical leaks, and accidents and other incidents at sea. In 2016/17, Fire and Emergency attended more medical emergencies than structure and vegetation fires combined. (Source: NZ Fire Service Annual Report 2016/17)

⁵ Average 2017-2021

⁶ Average 2017-2021. Fire and Emergency note the impact of COVID-19 on the number of incidents over the 2020/2021 period. In some urban environments, Fire and Emergency observed a reduction in fires and traffic accidents over this period. It is suspected this may have been due to people being home more during the pandemic and perhaps making them more vigilant around fires and reduction of unwanted fire, and fewer people in the public domain thereby reducing the likelihood of unwanted fires at beaches and parks.

Resource Management Act 1991 (RMA) and is included in the definition of a Qualifying Matter in the Enabling Act.

This submission seeks to enable Fire and Emergency to carry out its primary objective and functions under the Fire and Emergency New Zealand Act 2017 to provide protection of people, property and the environment in the event of an emergency.

This submission addresses matters relating to activities required to be undertaken to enable an effective emergency response and to provide for the health and safety of people and communities in Christchurch. Issues of particular interest and relevance to Fire and Emergency broadly include:

- ensuring emergency services appliances and Fire and Emergency personnel can adequately access both built and natural environments across Christchurch in the event of an emergency, and
- ensuring new development, including infill development, is adequately serviced by firefighting water supply, and
- maintaining and developing Fire and Emergency's property estate (e.g. fire stations) in strategic locations and at appropriate times to enable Fire and Emergency to continue to meet the demands and expectations of communities as they grow and change.

1.2 Proposed Heritage Plan Change 13

PC13 introduces eleven new Residential Heritage Areas (RHA) with the intent to recognise and protect around 60 buildings, items and building interiors to the Schedule of Significant Historic Heritage identified in the district plan. A 2,320m² section of property at 91 Chester Street East (Lot 1 Deposited Plan 53863, 7,396m²) has been zoned Medium Density Residential and included within the proposed 'RHA 2 – Chester Street East / Dawson Street' as shown in Figure 1 below. It is noted that the remaining 5,076m² of the site where the fire station is located has been rezoned High Density Residential.

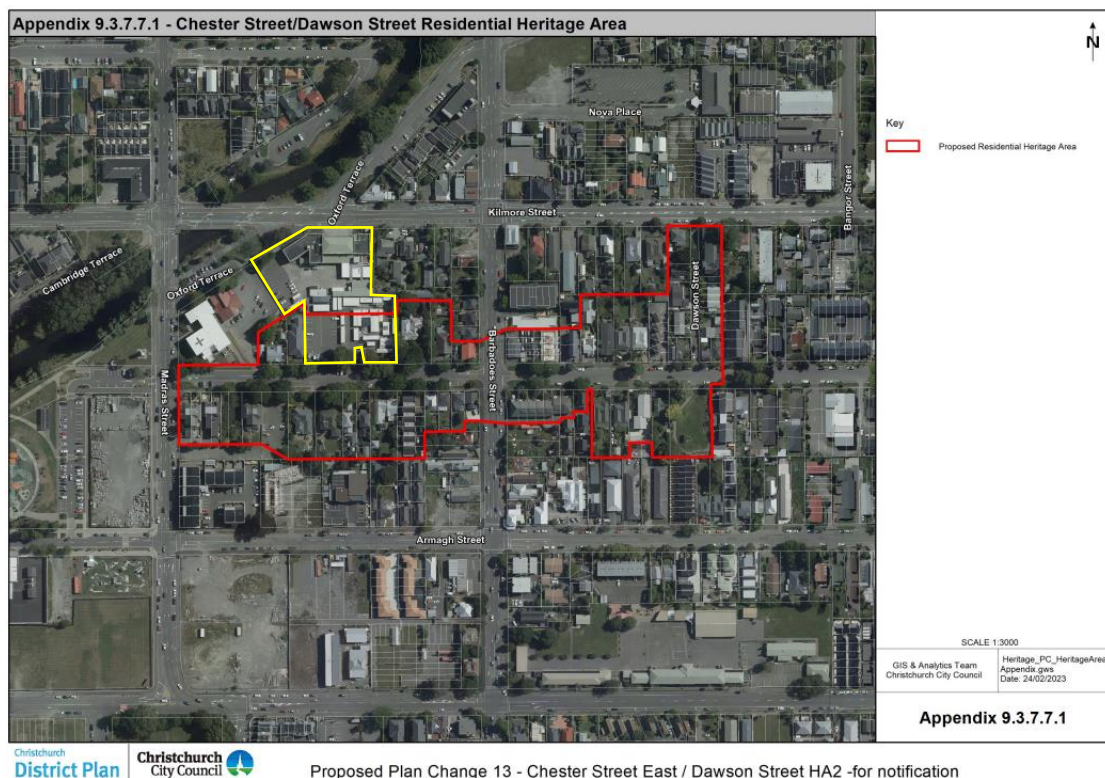


Figure 1. Proposed Residential Heritage Area 2 (shown in red) Fire and Emergency property shown in yellow.

Appendix 9.3.7.8.1 of the notified plan change documentation identifies 91 Chester Street East as an intrusive site within the RHA 2. As defined by PC13, an intrusive building or site as it relates to RHAs “are

buildings or sites which detract from and are inconsistent with the heritage values and significance of the heritage area. Vacant lots are also included as intrusive within the streetscape of the heritage area”.

Prior to notification of PC13, engagement occurred between Fire and Emergency and CCC in relation to 91 Chester Street East. This is recorded in the section 32 report which states:

Feedback requesting the removal of the Fire Station land situated at 91 Chester Street East was considered at a late stage, and a reduction of the site to be included in the Chester Street East/Dawson Street RHA was identified by staff as a possible compromise, however the details of this were not able to be agreed prior to notification. It is anticipated this will be addressed through submissions.

The site at 91 Chester Street East is held in the same Record of Title as the Christchurch City Fire Station (accessed via Kilmore Street) and is an integral part of the wider site. The site is currently occupied by portacom buildings which are used by Fire and Emergency. The site is intended to be developed into district offices and a resource garage which has been a longstanding proposal and integral to the functioning of the wider site.

While details around the site layout and built form have not been confirmed, the future district offices are likely to be single storey buildings and similar to the built form which surrounds the site. The resource garage will have the potential to be 5-6 metres in height.

The proposed RHAs introduce new rules and performance standards for developments within RHAs. For example, in RHAs, new buildings and alteration to building exteriors require resource consent as a restricted discretionary activity under Rule 9.3.4.1.3 RD6, except in situations specified in 9.3.4.1.3 RD6(c) and subject to matters of discretion set out in Rule 9.3.6.4.

For Fire and Emergency, this may require additional resource consents for any proposed new buildings on the site and require the buildings to be consistent with maintaining and enhancing the collective heritage values and significance of the heritage area and having regard to a suite of matters of discretion. In addition, any future alteration to building exteriors within the site would also likely require resource consent and based on the matters of discretion, require consultation with Heritage New Zealand Pouhere Taonga among other considerations, which will likely result in additional time and cost barriers for Fire and Emergency. These are likely to have operational and functional constraints for Fire and Emergency especially considering 91 Chester Street East is not subject to identified heritage items or within any heritage settings within the site.

Given the above, and that the future built form of 91 Chester Street East is unlikely to be inconsistent with the surrounding environment, it is considered that any potential development on the site would have minimal impact on the heritage area as built form already exists on the site.

Fire and Emergency request that the boundaries of RHA 2 are reduced to exclude the Fire and Emergency City Station site at 91 Chester Street East as shown in Figure 2 below. This is due to the additional time, costs and constraints imposed on this strategically significant site with no heritage items, buildings or settings present. Fire and Emergency need to be able to develop buildings that meet their operational and functional requirements. The future development of this site will be required to enable Fire and Emergency to carry out their primary objective and functions under the Fire and Emergency New Zealand Act 2017 to provide for the health and safety of people and communities in Christchurch.



Figure 2: Requested relief to remove 91 Chester Street East from RHA 2.

1.3 Emergency Service Access

Fire and Emergency requires adequate access to new developments, associated structures and the natural environment to ensure that they can respond in emergencies. This includes access in the event of fire, natural hazard, hazardous substances, medical or a rescue or assist.

Within the urban environment, the NPS-UD encourages higher residential densities, more varied housing typologies such as larger multi-unit development as well as a more compact urban form generally. While a more compact urban form focused on walkability and intensification around public transport (and subsequent mode shift) can reduce congestion and subsequently emergency response times, intensification and infill housing in Christchurch are challenging traditional access to properties for fire and other emergencies. This includes both vehicle access to the source as well as physical access by Fire and Emergency personnel to perform rescues and duties, where obstructions and site layout inhibit the use of lifesaving appliances such as ladders, hoses and stretchers.

The changes consequential to the NPS-UD will create new challenges for emergency services. Fire and Emergency consider it is vital for the health, safety and wellbeing of communities that the needs of emergency services are taken into account as new urban development is being planned. It is also important that future development areas are designed to be well-functioning and resilient to ensure that communities / residents are able to evacuate in the event of an emergency. If emergency responders cannot access people in the event of an emergency, this will not enable and provide for well-functioning and resilient communities and will not achieve Policy 1 of the NPS-UD. With regard to this, Fire and Emergency support the qualifying matter restricting developments to areas which are located within the key transport corridors.

1.3.1 Pedestrian only developments

Fire and Emergency note that as a result of the NPS-UD, the requirement for onsite parking in all residential developments has been removed, increasing the number of developments that provide only pedestrian access.

Fire and Emergency acknowledge that the New Zealand Building Code (NZBC) C5 specifies access and safety requirements for firefighting operations, where certain buildings must be designed and constructed so that there is a low probability of firefighters or other emergency services personnel being delayed in or impeded from assisting in rescue operations and performing firefighting operations. Buildings must also be

designed and constructed so that there is a low probability of illness or injury to firefighters or other emergency services personnel during rescue and firefighting operations.

Of particular note, a performance requirement of C5 is that buildings must be provided with access for fire service vehicles to a hard-standing from which there is an unobstructed path to the building within 20m of the firefighter access into the building and the inlets to automatic fire sprinkler systems or fire hydrant systems, where these are installed (among other requirements). These performance requirements do however not apply to detached dwellings, within household units in multi-unit dwellings, or to outbuildings, and ancillary buildings.

Given the shortfalls with the NZBC and the lack of clarity/consistency in the interpretation/application of the NZBC and the RMA, Fire and Emergency are concerned that pedestrian only access developments and inadequate vehicle access provisions can prevent efficient access to properties by responders in event of a fire or emergency or to use tools and equipment effectively if required. This has the potential to significantly increase the risk to life and property.

Should developments not provide a vehicle access and/or provides for pedestrian only access, this means that many developments will be unable to comply with the NZBC Fire and Emergency vehicular access requirements and subsequently firefighter access is not provided.

In the interim period while the NZBC catches up with the changing urban environment, Fire and Emergency consider that the RMA needs to address this matter up front in order to manage the use, development and protection of natural and physical resources which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety in accordance with Section 5 of the RMA.

To support effective and efficient access and manoeuvring of crew and equipment for firefighting, medical, rescue and other emergency response to developments across Christchurch city, Fire and Emergency require:

- Pedestrian accessways that are clear, unobstructed and well-lit,
- Wayfinding for different properties on a development are clear in day and night,
- That developments give effect to the guidance provided in the Fire and Emergency's 'Designer's guide' to firefighting operations Emergency vehicle access' (December 2021)⁷,
- Pedestrian accessways have a minimum width of:
 - 3m on a straight accessway,
 - 6.2m on a curved or cornered accessway, and
 - 4.5m space to position the ladder and perform operational tasks.

1.3.2 Emergency vehicle access

Adequate fire appliance access to both the source of a fire (or other emergency) and a firefighting water supply is essential to the efficient operation of Fire and Emergency. The requirements for firefighting access are set out in the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (SNZ PAS 4509:2008)⁸, are further detailed in Fire and Emergency's 'Designer's guide' to firefighting operations Emergency vehicle access' (December 2021).

These requirements are necessary for Fire and Emergency to be able to operate pumping appliances from a hard standing. Often, this can be done from the public road, and this is how Fire and Emergency prefers to operate where possible. Pumping appliances are vehicles used to pump water for firefighting (refer Appendix A of the Fire and Emergency's 'Designers' guide). They carry a relatively small amount of water (1,350–

⁷ The Fire and Emergency Designers Guide to Firefighting Operations for emergency vehicle access provides help to ensure building designs comply with the NZBC C5 and can be found here: <https://www.fireandemergency.nz/assets/Documents/Business-and-Landlords/Building-and-designing-for-fire-safety/F5-02-GD-FFO-emergency-vehicle-access.pdf>

⁸ The New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 can be found here: <https://fireandemergency.nz/assets/Documents/Files/N5a-SNZPAS-4509-2008-NZFS-Firefighting-water-supplies-Code-of-practice.pdf>

2,000 litres) and have a limited length of hose. Accordingly, Fire and Emergency must have access to a water supply and must also be able to base operations near the fire source, so firefighters can reach the fire with water.

Fire and Emergency has strong concerns that even in situations where the NZBC applies, many recent developments are not compliant with the performance criteria of C5 and therefore do not comply with the NZBC (in particular 20m access to the building for firefighting or 75m hose length to the furthest point). In addition, there have been recent examples of residential applications that have provided on-site alternative water supply for firefighting to respond to insufficient reticulated supply, but inadequate emergency access meaning that a fire appliance would not be able to reach the firefighting water supply.

For these reasons, CCC need to carefully consider how emergency vehicle access will be provided for new residential developments.

Given the apparent gap in the NZBC, significant consideration needs to be given to new rules and a related policy framework to enable adequate access to detached residential dwellings by emergency vehicles and personnel (i.e. SH risk group buildings not covered by the NZBC).

For all other developments to which C5 applies, Fire and Emergency request that, where not already provided for, the Christchurch District Plan introduce rules that 'duplicate' the requirements of the Part 6: firefighting of C/AS1 and C/AS2. Fire and Emergency consider that this approach would prevent resource consents being issued that could not be implemented because the layout does not demonstrate compliance with the performance requirements and need to be redesigned to provide sufficient firefighter access. This could mitigate some risks, especially when activities that currently require resource consent move to permitted.

Further, Fire and Emergency seek the provision of adequate access through voluntary measures such as 'best practice' recommendations in the urban design guides. These proposed measures would encourage developments to consider early in their design the requirements of emergency services. Fire and Emergency recommends developments give effect to the guidance provided in the Firefighting Operations Emergency Vehicle Access Guide.

Adequate provision for emergency responder access will enable Fire and Emergency to:

- Get into the building and to move freely around their vehicles.
- Gain access to rear dwellings on long sites where hose run lengths become an issue.
- Ensure the safety of firefighters and enable firefighters to deal quickly to smaller undeveloped fires before they develop and endanger members of the public and the firefighters who may need to assist them in either rescues and/or firefighting.

1.3.3 Carparking

Fire and Emergency is already encountering new development where emergency vehicle access along the roading corridor has been challenging. Issues with emergency vehicle access in these locations can be caused by narrow roads / laneways, higher density typologies and a lack of off-street parking available resulting in cars parking along both sides of already narrow residential streets. Implications for emergency services include on-road obstructions, meaning emergency vehicles have difficulty or are unable to manoeuvre, as well as an inability to access buildings and locate fire hydrants in an emergency. Inadequate parking lengths along frontages also have been encountered generally from vehicles parking over footpaths in driveways, blocking access.

Fire and Emergency acknowledges that, where no off-street parking is required, there may also be no requirement to provide for vehicular access to a property. In these situations, emergency service staff would need to enter a property on foot and/or remove fences and other structures to provide access. Regardless, there needs to be sufficient clearance to access properties with heavy emergency equipment.

Despite Policy 11 and clause 3.38 of the NPS-UD, consent authorities can continue to consider the effects of car parking supply and demand in resource consent applications. Given that section 104(1) requires a consent authority to have regard to 'any actual and potential effects on the environment of allowing [an] activity', an adverse effect of a particular activity could include adverse traffic effects on the local or wider road network.

Section 108AA of the RMA relates to requirements for conditions of resource consents. Section 108AA(1)(b) provides that a condition must not be included in a resource consent for an activity unless the condition is directly connected to one or both of an adverse effect of the activity on the environment and/or an applicable rule, or a national environmental standard.

Fire and Emergency supports the consideration of parking made through the PC14 amendments made to the matter of control 14.15.1 Residential Design Principles. This would enable conditions to be imposed on a case-by-case basis, having regard to the effects of a particular activity.

This will see that CCC and the community are still able to consider any positive or adverse effects, and ensure any adverse effects can be avoided, remedied and mitigated. This would likely be most appropriate for large development applications with a significant under-provision of parking for the type and location of the activity. Consideration should also be given to the requirements of a transportation assessment to determine the impact of development of the roading network. It could also be necessary to use a condition of consent to tie a development application to preparing or updating a comprehensive parking management plan.

1.3.4 Reduced setbacks

The minimum building setbacks from boundaries and between buildings in the Medium Density Residential Zone is 1m on side boundaries from buildings on all sides increasing the risk of fire spreading and can inhibit Fire and Emergency personnel from getting to the fire source. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area.

The C3 of the NZBC is relevant here whereby buildings must be designed and constructed so that there is a low probability of fire spread to other property vertically or horizontally across a relevant boundary. Achieving this functional requirement is however limited by the mechanisms by which this is achieved (i.e. Acceptable Solutions) and buildings of which such requirements apply.

It is therefore vital that the NZBC is enforced and complied with to reduce the risk of fire spread in the intensified urban areas. This includes careful consideration of requirements to use non-combustible building materials to slow the vertical and horizontal spread of fire.

Fire and Emergency encourage CCC to consider integrating these considerations into the urban design guides to align with the NZBC and prompt developments to consider fire risk mitigations early on in design.

1.3.5 Other legislative requirements

PC14 will enable developments of medium and high densities which in most circumstances would increase the occupancy of buildings. As such, regulations under the Fire and Emergency New Zealand Act 2017 relating to evacuation schemes require consideration. These requirements relate to 'relevant buildings' (as defined by the Fire and Emergency New Zealand Act 2017) where a building or part of a building is used for one or more of the following purposes:

- (i) *the gathering together, for any purpose, of 100 or more persons:*
- (ii) *providing employment facilities for 10 or more persons:*
- (iii) *providing accommodation for 6 or more persons (other than in 3 or fewer household units):*
- (iv) *providing an early childhood education and care centre (other than in a household unit):*

- (v) *providing nursing, medical, or geriatric care (other than in a household unit):*
- (vi) *providing specialised care for persons with disabilities (other than in a household unit):*
- (vii) *providing accommodation for persons under lawful detention (not being persons serving a sentence of home detention or community detention, or serving a sentence of imprisonment on home detention, or on parole subject to residential restrictions imposed under section 15 of the Parole Act 2002):*
- (viii) *any other prescribed purpose; or...*

The NZBC does not stipulate the need for an alarm system that would support the expected coordination of an “Approved Evacuation Scheme” under the evacuation Regulations 2018. This increases the risk to the health and safety of people and communities where buildings are not adequately designed or built to provide for fire safety and evacuation procedures.

Until such time where the NZBC is updated to account for the intensification of the residential built environment, Fire and Emergency, as a minimum, seek that an advice note within the district plan be included to direct plan users to the Fire and Emergency New Zealand Act 2017, specifically, Clause 191 – Regulations relating to fire safety and evacuation procedures in relation to buildings, Clause 192 – Regulations relating to evacuation schemes for buildings and Part 2 of Fire and Emergency New Zealand (Fire Safety, Evacuation Procedures, and Evacuation Schemes) Regulations 2018 which relates to Evacuation Schemes.

1.4 Firefighting water supply

It is critical for Fire and Emergency that water supply infrastructure is in place prior to any development commencing and that this water supply has adequate capacity and pressures available to service the future growth. Fire appliances carry a limited amount of water; therefore, it is necessary that adequate water capacity and pressure be available to Fire and Emergency to control or extinguish a fire. In the urban areas of Christchurch, water is sourced from the reticulated water supply network however where reticulation is not available or limited (i.e. trickle fed), alternative water sources will be required. This may be in the form of dedicated water tanks or ponds for firefighting. Adequate physical access to this water supply for new development (whether reticulated or non-reticulated) is also essential.

Adequate capacity and pressure for each development can be determined through the SNZ PAS 4509:2008. The SNZ PAS 4509:2008 is a non-mandatory New Zealand Standard that sets out the minimum requirements for firefighting water and access in order for Fire and Emergency to operate effectively and efficiently in an emergency.

For subdivision and developments, provision of a firefighting water supply is required by Rule 8.7.7(b) of the operative Christchurch District Plan. Additional built form standards also exist in Chapter 14 Medium Density Residential standards (Rule 14.5.2.14), High Density Residential Zone (Rule (14.6.2.13), Commercial Zone standards (Rule 15.5.2.8 & 15.8.2.7) and have been further amended through PC14 to consider where the reticulated water supply is not available, an alternative firefighting water supply should be provided in accordance with SNZ PAS 4509:2008.

Fire and Emergency consider it essential that urban development does not occur out of sequence with the delivery of key strategic infrastructure (network extensions or upgrades), or development is not enabled where there is potential or known infrastructure capacity constraints in relation to the Three Waters, in particular the water supply network.

Fire and Emergency considers that all subsequent subdivision and development should be subject to development standards within the district plan requiring all applicants to demonstrate by way of providing evidence (i.e. hydrant flow testing) that their development can be adequately serviced for firefighting water

supply in accordance with the SNZ PAS 4509:2008 across all zones. If this does not become part of the consenting regime, there will likely be development with inadequate firefighting water supply with potentially serious consequences for life and property. Fire and Emergency strongly support CCCs approach requiring sufficient the provision of firefighting water supply through built form or activity standards through the district plan, including the amendments proposed through PC14.

1.5 Demand on emergency services

Fire and Emergency has a Statement of Performance Expectations⁹ which sets out targets to delivering timely and effective fire response and suppression services as well as other services¹⁰.

Community need for Fire and Emergency services has been increasing, thereby increasing Fire and Emergency's presence on the roads and need for fast and efficient access to incidents across Christchurch.

Urban growth and intensification coupled with the increasing rate of extreme weather events and risk from natural hazards and other environmental and demographic changes across communities is likely to result in a greater demand on emergency services and consequently can affect response times if not managed.

Fire and Emergency's response time commitments to the government and community are key determinants for the location of new, or expansion of existing fire stations. Fire stations therefore need to be strategically located within and throughout communities to maximise their coverage and maintain appropriate response times and efficiently provide for the health and safety of people and communities.

As urban areas develop and intensify, the ability to construct and operate fire stations in locations which will enable reasonable response times to fire and other emergencies is critical for the health, safety, and wellbeing of people in the community. In this regard, it is noted that Fire and Emergency is not a requiring authority under section 166 of the RMA and therefore does not have the ability to designate land for the purposes of fire stations.

Provisions within the rules of the District Plan therefore may be the best way to facilitate the development of any new emergency service facilities as the city grows. Ongoing, and more frequent engagement with Fire and Emergency in terms of growth projections and demographic changes will assist us in understanding where we may need new emergency service facilities in the future. This will be particularly important during plan review and plan changes that seek to re-zone large portions of land to facilitate development.

Fire and Emergency seek the following decision from the local authority:

Appendix A sets out the details of Fire and Emergency's submission, including the amendments sought by Fire and Emergency to specific provisions in PC13 and PC14, and the reasons for the amendments.

Fire and Emergency would welcome and questions or further engagement on matters raised in the submission.

Fire and Emergency may wish to be heard in support of its submission depending upon the proposed amendments to the PC13 and PC14 provisions as notified.



⁹ Statement of Performance Expectations 2022/23 can be found here: <https://www.fireandemergency.nz/assets/Documents/Files/Statement-of-Performance-Expectations-2022-2023.pdf>

¹⁰ Fire and Emergency Act 2017 sections 10-12

Signature of person authorised to sign on behalf of
Fire and Emergency

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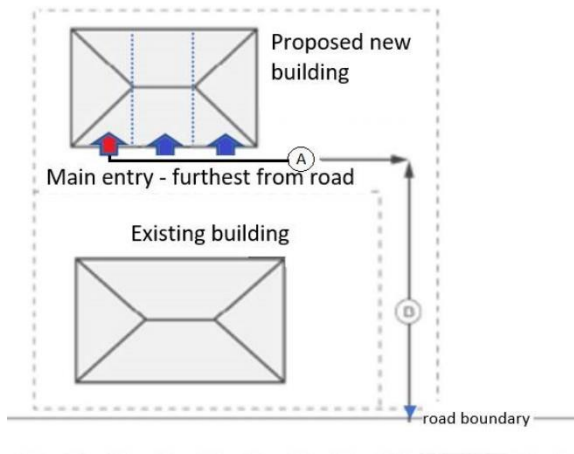
Appendix A

The following table sets out the specific position and any amendments sought by Fire and Emergency. Where specific amendments to provisions of PC13 and PC14 are sought, these amendments are shown as red underline (for new text sought) and ~~word~~ (for deletion).

ID	Proposed provision	Support /Oppose	Submission	Requested relief
Chapter 3: Strategic Direction				
1	3.3.7 Objective – Well functioning urban environments	Support	Fire and Emergency support new objective 3.3.7(a) to the extent that it anticipates 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. Fire and Emergency considers that this includes the provision of adequate emergency access and sufficient firefighting water supply.	Retain as notified.
2	3.3.8 Objective – Urban growth, form and design	Support	Fire and Emergency supports 3.3.8(ix) as it promotes the safe, efficient, and effective provision and use of infrastructure, including the optimisation of the use of existing infrastructure. This would include the water supply network.	Retain as notified.
Chapter 7: Transport				
3	7.2.1.9 Policy – Pedestrian Access	Support in part	Fire and Emergency supports policy 7.2.1.9 to the extent that the policy requires pedestrian access be designed to a sufficient width and grade meeting the requirements of all users. Given the importance and role of emergency services, Fire and Emergency request that the policy be amended to explicitly include reference to emergency services.	Amend as follows: 7.2.1.9 Policy – Pedestrian Access a. Pedestrian access is designed to: i. Be sufficient width and grade that the pedestrian access meets the access requirements of all users, including persons with a disability of with limited mobility <u>and emergency services</u> . ii. ...
4	7.4.4.27 Pedestrian Access	Support in part	Fire and Emergency's submission raises concern with pedestrian-only access developments not providing for emergency responder access. The proposed matters of discretion set out in 7.4.4.27 that apply to Rule 7.4.3.7b do not consider the ability for	Amend as follows: 7.4.4.27 Pedestrian Access a. The following are matters of discretion for Rule 7.4.3.7 b:

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			emergency responders to undertake operational activities including movement of ladders.	<ul style="list-style-type: none"> i. whether the pedestrian access is suitable for use by persons with a disability or with limited mobility; ii. whether any alternative pedestrian access is provided and the formation and safety of that alternative; iii. the effects on the safety and security of people using the pedestrian access and those occupying residential units on the site; and iv. the functionality of the pedestrian access to meet the needs of occupants including but not limited to the transportation of rubbish and recycling for collection and the ability for cyclists to safely access any private and shared cycle storage areas, and v. <u>whether the pedestrian access is suitable for use by emergency services.</u>
5	Appendix 7.5.7 Access design and gradient	Support in part	<p>Fire and Emergency support in part:</p> <ul style="list-style-type: none"> • 7.5.7(a) – that requires all vehicle access to and within a site to be in accordance with the standards set out in Table 7.5.7.1, subject to the relief sought in Table 7.5.7.1. • 7.5.7(b) - to the extent that provision of passing bays may provide a hardstand area for fire appliances to operate in scenarios where vehicle accessways exceed 50m. • 7.5.7(c) – to the extent that it requires either a combined vehicle-pedestrian access or a dedicated pedestrian access with associated minimum standards. Fire and Emergency request that these minimum standards be amended to provide for emergency responder access for reasons set out in Section 1.3.1 above. 	<p>Amend as follows:</p> <p>Appendix 7.5.7 Access design and gradient</p> <p>...</p> <ul style="list-style-type: none"> c. For developments of three or more residential units, each unit shall be accessed by either a combined vehicle-pedestrian access or a dedicated pedestrian access that is: <ul style="list-style-type: none"> (i) a minimum <u>formed width</u> of 3 metres in width on a straight accessway, with a formed pathway of at least 4.5m; or (ii) <u>6.2m on a curved or cornered accessway;</u> and

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			<ul style="list-style-type: none"> 7.5.7(h) – to the extent that it considers vehicle access for firefighting where a building is either located outside of a reticulated area, or further than 75m from the nearest road that is fully reticulated. This sets a minimum formed width of 3.5m and a height clearance of 4m. Section 1.3.2 of this submission sets out the minimum requirements for fire appliance access which includes a minimum of 4m vehicle access width in order to enable Fire and Emergency personnel to manoeuvre around the vehicle in an emergency. Correspondence with CCC post notification regarding Appendix 7.5.7(h) indicated that proposed changes to this clause were omitted from notification in error. Amendments are sought regarding this clause to provide sufficient access for emergency appliances. 7.5.7(n) – to the extent that it sets maximum gradients for vehicle accesses. Fire and Emergency further request amendments to the 7.5.7(n) as per relief. 	<p>(iii) each access shall be from the street to the front door of the unit and any garage or parking space for that unit.</p> <p>...</p> <p>h. For the purposes of access for firefighting, where a building is either:</p> <ul style="list-style-type: none"> i. located in an area where no fully reticulated water supply system is available; or ii. located further than 75 metres from the nearest road that has a fully reticulated water supply system including hydrants (as required by NZS 4509:2008). <u>75 metres is measured from the road boundary via an existing or proposed property access, to the main entry furthest from the road (Figure 7A); or</u> iii. <u>located in the Residential Hills Precinct and is a residential unit on a rear site,</u> <p>vehicle access shall have a <u>must be a</u> minimum formed width of 3.5 4 metres <u>for its entire length,</u> and a height clearance of 4 metres. Such vehicle access shall be designed <u>and maintained to be</u> free of obstacles that could hinder access for emergency service vehicles.</p> <p>...</p> <p>n. The maximum gradient at any point on a vehicle access shall be in accordance with Table 7.5.7.2, except a maximum gradient of 1 in 5 (minimum 4.0 metres long transition ramps for a change of grade 1 in 8 or greater) shall apply for accesses that are identified in (g and <u>h</u>). For curved accesses, the maximum gradient shall be measured on the inside of a curved vehicle access.</p>

ID	Proposed provision	Support /Oppose	Submission	Requested relief												
6	Figure 7A	New	The proposed Figure 7A is intended to assist plan users and provide clarity in relation to 7.5.7(h)(ii).	A+B Less than or equal to 75m 												
7	Table 7.5.7.1 – Minimum requirement for private ways and vehicle access	Support in part	Fire and Emergency require a minimum formed access width of 4m for emergency vehicles and a minimum 4m height clearance to be able to effectively and efficiently access sites with their fire appliances. It is noted that Appendix 7.5.7(h) requires a minimum access width of 4m where an accessway exceeds 75m (as per proposed new Figure 7A above). This is in acknowledgment that where accessways do not exceed 75m, Fire and Emergency should be able to operate from the road. The proposed minimum formed width for Table 7.5.7.1 a. and b. requires a 3.0m minimum formed width. While it would be Fire and Emergency’s preference that Fire and Emergency are able to access all properties with their vehicles, Fire and Emergency support the 3m width that applies to residential activity and offices in recognition that medium and high-density zones result in a more	Amend as follows: Table 7.5.7.1 – Minimum requirement for private ways and vehicle access: <table><tr><th></th><th>Activity</th><th>Minimum formed width (metres)</th><th>Central City height clearance (metres)</th></tr><tr><td>a.</td><td>Residential activity and offices</td><td>3.0</td><td>3.5 4.0</td></tr><tr><td>b.</td><td>Residential activity and offices</td><td>3.0</td><td>4.0</td></tr></table> Advice note: For any buildings that are greater than 75m from the road, Appendix 7.5.7 Access, gradient and design clause h is applicable.		Activity	Minimum formed width (metres)	Central City height clearance (metres)	a.	Residential activity and offices	3.0	3.5 4.0	b.	Residential activity and offices	3.0	4.0
	Activity	Minimum formed width (metres)	Central City height clearance (metres)													
a.	Residential activity and offices	3.0	3.5 4.0													
b.	Residential activity and offices	3.0	4.0													

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			<p>compact environment. However, this support is subject to these buildings being no more than 75m from the road and that the relief sought in Appendix 7.5.7(h) is accepted in order to manage risk relating to emergency service access in the medium and high-density environments.</p> <p>The height clearance of 3.5m in a. would significantly impact the ability of emergency responders to provide effective and efficient assistance and therefore seek that this be increased to 4m in line with the SNZ PAS 4509:2008. Without the changes recommended above, assessment of non-compliance with this standard against matter of discretions is challenging as the permitted baseline is already insufficient.</p>	
Chapter 8: Subdivision, Development and Earthworks				
8	8.2.3.2 Policy – Availability, provision and design of, and connections to, infrastructure	Support	Fire and Emergency support the amendment to Policy 8.2.3.2 to include reference to ‘and development’ whereby requiring both subdivision and development to not occur in areas where infrastructure is not performing, serviceable or functional which would include the water supply network.	Retain as notified.
9	8.5.1.2 Controlled Activities C8	Support	<p>Fire and Emergency support subdivision being subject to Rule 8.6.7 that requires the provision of a sufficient water supply and access to water supplies for firefighting consistent with SNZ PAS 4509:2008.</p> <p>Additionally, Fire and Emergency further support the subsequent matter of control, 8.7.4.3k ‘Servicing and infrastructure’ requires consideration of the suitability of the proposed water supply for firefighting purposes, including the extent of compliance with SNZ PAS:4509:2008 in respect of the health and safety of the community, including neighbouring properties.</p>	Retain as notified.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
10	8.5.1.2 Controlled Activities C9	Support	Fire and Emergency support subdivision being subject to Rule 8.6.7 that requires the provision of a sufficient water supply and access to water supplies for firefighting consistent with SNZ PAS 4509:2008. Additionally, Fire and Emergency further support the subsequent matter of control 8.7.4.3k 'Servicing and infrastructure' requires consideration of the suitability of the proposed water supply for firefighting purposes, including the extent of compliance with SNZ PAS:4509:2008 in respect of the health and safety of the community, including neighbouring properties.	Retain as notified.
11	8.5.1.2 Controlled Activities C10	Support	Fire and Emergency support subdivision being subject to Rule 8.6.7 that requires the provision of a sufficient water supply and access to water supplies for firefighting consistent with SNZ PAS 4509:2008. Additionally, Fire and Emergency further support the subsequent matter of control, 8.7.4.3k 'Servicing and infrastructure' requires consideration of the suitability of the proposed water supply for firefighting purposes, including the extent of compliance with SNZ PAS:4509:2008 in respect of the health and safety of the community, including neighbouring properties.	Retain as notified.
12	8.6.3 – Access	Support in part	Fire and Emergency support the access Rule 8.6.3(a) and the requirement to comply with the standards set out in Chapter 7, subject to the amendments sought in Appendix 7.5.7.	Retain as notified.
Chapter 9: Natural and Cultural Heritage				
13	9.3.4.1.1 Permitted activities P2	Oppose in part	Fire and Emergency seek clarity as to whether an intrusive building within a residential heritage area would be subject to the activity specific standards set out in permitted activity rule 9.3.4.1.1. This would result in unnecessary cost and time delays for Fire and Emergency to repair a building that is not of heritage value.	See relief sought in section 1.2 above.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			Notwithstanding this, Fire and Emergency has sought in in section 1.2 of this submission, that 91 Chester Street East be removed from RHA 2.	
14	9.3.4.1.1 Permitted activities P3	Oppose in part	91 Chester Street East, as notified is subject to 9.3.4.1.1 P3 (a)(iv). Given the site or associated buildings on site have no heritage fabric, it is assumed that the activity specific standard is not applicable. Notwithstanding this, Fire and Emergency has sought in in section 1.2 of this submission, that 91 Chester Street East be removed from RHA 2.	See relief sought in section 1.2.
15	9.3.4.1.1 Permitted activities P12	Oppose in part	Fire and Emergency recognise that this would enable the demolition or relocation of the buildings located at 91 Chester Street East as a permitted activity. Notwithstanding this, Fire and Emergency has sought in in section 1.2 of this submission, that 91 Chester Street East be removed from RHA 2.	See relief sought in section 1.2.
16	9.3.4.1.1 Permitted activities P13	Oppose in part	Fire and Emergency recognise that this would enable the construction of a fence or wall to 1.5m in height at 91 Chester Street East as a permitted activity. Notwithstanding this, Fire and Emergency has sought in in section 1.2 of this submission, that 91 Chester Street East be removed from RHA 2.	See relief sought in section 1.2
17	9.3.4.1.3 Restricted discretionary activities RD6	Oppose	Whilst the details around the site layout and built form have not been confirmed, the future district offices are likely to be single storey buildings and similar to the built form which surrounds the site. The resource garage will have the potential to be 5-6 metres in height. For Fire and Emergency, this would require additional resource consents for any proposed new buildings on the site including offices and a resource garage and would require the buildings to be consistent with maintaining and enhancing the collective heritage values and significance of the heritage area, and have particular regard to a suite of matters of discretion.	See relief sought in section 1.2.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			<p>In addition, any future alteration to building exteriors within the site would also likely require resource consent and based on the matters of discretion, require consultation with Heritage New Zealand Pouhere Taonga among other considerations, which will have additional time and cost barriers for the development.</p> <p>These are likely to have operational and functional constraints for Fire and Emergency especially considering 91 Chester Street East does not have any identified heritage items or heritage settings within the site.</p> <p>Fire and Emergency consider that it would be appropriate to remove 91 Chester Street from the RHA 2, enabling the development necessary to carry out their duty to provide for the health and safety of people and the community in Christchurch.</p>	
18	9.3.4.1.3 Restricted discretionary activities RD8	Support	<p>Fire and Emergency support the rule for any new buildings on a site in the High Density Residential Zone located outside a RHA as it is not likely that there will be any future additions to the Christchurch City Station site which is located in this zone.</p> <p>It is also noted that the site at 91 Chester Street East that Fire and Emergency are seeking the removal from RHA 2 is zone Medium Density Residential. Therefore, this rule would not be applicable to any development in the Medium Density Residential Zone portion of the site.</p>	Retain as notified.
19	9.3.6.4 Residential Heritage Areas (excluding Akaroa Township Heritage Area) - new buildings, fences and walls, and exterior alterations to buildings	Oppose in part	<p>Whilst the details around the site layout and built form have not been confirmed, the future district offices are likely to be single storey buildings and similar to the built form which surrounds the site. The resource garage will have the potential to be 5-6 metres in height.</p> <p>For Fire and Emergency, this would require additional resource consents for any proposed new buildings on the site including offices and a resource garage and would require the buildings to be</p>	See relief sought in section 1.2

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			<p>consistent with maintaining and enhancing the collective heritage values and significance of the heritage area, and have particular regard to a suite of matters of discretion.</p> <p>In addition, any future alteration to building exteriors within the site would also likely require resource consent and based on the matters of discretion, require consultation with Heritage New Zealand Pouhere Taonga among other considerations, which will have additional time and cost barriers for the development.</p> <p>These are likely to have operational and functional constraints for Fire and Emergency especially considering 91 Chester Street East is not subject to identified heritage items or within any heritage settings within the site.</p> <p>Fire and Emergency consider that it would be appropriate to remove 91 Chester Street from the RHA 2, enabling the development necessary to carry out their duty to provide for the health and safety of people and the community in Christchurch.</p>	
20	9.3.6.6 Sites in the High Density Residential Zone and Residential Visitor Accommodation Zone Sharing a boundary with a Residential Heritage Area	Support	<p>Fire and Emergency generally support this matter of discretion as it is not likely that there will be further development on the Christchurch City Station site which is located in the High Density Residential Zone.</p> <p>It is also noted that Fire and Emergency are seeking the removal of 91 Chester Street from RHA 2. However, this portion of the site is zoned Medium Density Residential so any developments would not be subject to Rule 9.3.4.1.3 RD8 or this matter of discretion.</p>	Retain as notified.
21	Appendix 9.3.7.3 Schedule of Significant Historic Heritage Areas	Oppose	<p>Fire and Emergency oppose the inclusion of 91 Chester Street East as part of the RHA 2 as it imposes unnecessary restrictions on the site with regard to new buildings and alterations to existing buildings and introduces additional resource consent requirements. This will not only increase the cost to</p>	See relief sought in section 1.2.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			<p>Fire and Emergency but restrict the design and built form of their future district offices and resourcing garage.</p> <p>Therefore, it is sought the 91 Chester Street East is removed from RHA 2. It is further requested that Appendices 9.3.7.7.1, 9.3.7.8.1 and 9.3.7.9.1 are updated to reflect the removal of the site.</p>	
22	Appendix 9.3.7.7.1 – Proposed Plan Change 13 – Chester Street East / Dawson Street HA2	Oppose	<p>As abovementioned, it is sought that 91 Chester Street East is removed from Heritage area 2. Therefore, Appendix 9.3.7.7.1 would need to be updated accordingly.</p>	See relief sought in section 1.2.
Chapter 13: Specific Purpose Zone				
Sub-chapter 13.6 Specific Purpose (School) Zone				
23	13.6.4.2.7 – Water Supply for firefighting	Support	<p>Fire and Emergency support activities within the Specific Purpose (School) Zone being subject to 13.6.4.2.7.</p> <p>This is further supported by existing matter of discretion 13.6.5.3 Water supply for firefighting which requires consideration of whether sufficient firefighting water supply is available to ensure the safety of people and property in the zone, as well as neighbouring properties, in the event of fire.</p> <p>Fire and Emergency acknowledge that the requirement to limited notify the 'New Zealand Fire Service Commission' (now Fire and Emergency New Zealand) has been removed. Fire and Emergency recognise that this does not remove the requirement to comply with the performance standard and therefore is not opposed to the removal of 13.6.4.2.7.</p>	Retain as notified.
Chapter 14: Residential				
Sub-Chapter 14.4 – 14.3 – Introduction / Objectives and Policies				
24	14.2.3.8 Policy – Fire fighting water capacity	Support	<p>Fire and Emergency supports policy 14.2.3.8 that requires residential developments to have sufficient water supply for firefighting purposes to ensure the health and safety of people and communities.</p>	Retain as notified.
25	New policy	New		Add new policy:

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			Fire and Emergency seeks new policies in relation to the development in medium density residential zone, high density residential zone and the future urban zone. These zones will enable extensive new development around existing fire stations. Fire and Emergency are seeking that the policies recognise the existing potential effects from an emergency service facility and that their effects are not considered to constitute an adverse effect where subsequent housing intensification has occurred on neighbouring sites.	<u>14.2.6.3 Policy – Reverse Sensitivity</u> <u>a. Within Medium Density Residential areas:</u> i. <u>enable the ongoing operation, use and redevelopment of existing emergency service facilities.</u>
26	<u>New policy</u>	<u>New</u>	This could be achieved by a no complaints covenant on the neighbouring titles or a performance standard which the permitted activities need to be subject to.	Add new policy: <u>14.2.7.7 Policy – Reverse sensitivity</u> <u>a. Within High Density Residential areas:</u> i. <u>enable the ongoing operation, use and redevelopment of existing emergency service facilities.</u>
27	<u>New policy</u>	<u>New</u>		Add new policy: <u>14.2.8.8 Policy – Reverse sensitivity</u> <u>a. Within Future Urban areas:</u> i. <u>enable the ongoing operation, use and redevelopment of existing emergency service facilities.</u>
Sub-chapter 14.4 – Rules – Residential Suburban and Residential Suburban Density Transition Zone				
28	14.4.2.3 Building height	Support in part	Fire stations are typically single storied buildings of approximately 8-9m in height, and emergency service towers and communication poles can be around 12 to 15 metres in height. The emergency service towers, and communication poles serve several purposes being for hose drying, communications and training purposes on station. The need for emergency service towers and communication poles required at stations is dependent on locational and operational requirements of each station. Fire and Emergency is seeking an exemption for emergency service towers and communication poles in order to appropriately provide for the health and safety of the community by enabling the efficient	Amend as follows: 14.4.2.3 Building height a. The maximum height of any building shall be: ... Advice note: 1. See the permitted height exceptions contained within the definition of height 2. <u>Emergency service facilities, emergency service towers and communication poles are exempt from this rule.</u>

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			functioning of Fire and Emergency in establishing and operating fire stations and associated structures. This exemption could either be provided under the permitted height exemptions contained within the definition or a further advice note.	
Sub-chapter 14.5 – Rules – Medium Density Residential Zone				
29	14.5.1.3 Restricted discretionary activity RD21	Support in part	<p>Fire and Emergency support the permitted activities listed in Rule 14.5.1.1 being subject to performance standard 14.5.2.14 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary activity status and the supporting matter of discretion 14.15.3.8 that requires consideration of whether sufficient firefighting water supply is available to ensure the health and safety of the community, including neighbouring properties.</p> <p>Fire and Emergency however note an error in the numbering in 14.5.1.3 RD21 and request that this be amended as per the relief sought.</p>	<p>Amend 14.5.1.3 RD21 as follows:</p> <ol style="list-style-type: none"> Residential units that do not meet Rule 14.5.2.14 – Water supply for fire fighting. Any application arising from this rule shall not be publicly notified <p>Council's discretion is limited to:</p> <ol style="list-style-type: none"> Water supply for fire fighting – Rule 14.15.78
30	14.5.2.3 Building height and maximum number of storeys	Support in part	<p>Fire stations are typically single storied buildings of approximately 8-9m in height, and emergency service towers and communication poles can be around 12 to 15 metres in height. The emergency service towers and communication poles serve several purposes being for hose drying, communications and training purposes on station. The need for emergency service towers and communication poles required at stations is dependent on locational and operational requirements of each station.</p> <p>Fire and Emergency is seeking an exemption for emergency service facilities, emergency service towers and communication poles in order to appropriately provide for the health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations and associated structures.</p>	<p>Amend as follows:</p> <p>14.5.2.3 Building height and maximum number of storeys</p> <p>...</p> <p><u>Advice note:</u></p> <ol style="list-style-type: none"> See the permitted height exceptions contained within the definition of height <u>Emergency service facilities, emergency service towers and communication poles are exempt from this rule.</u>

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			This exemption could either be provided under the permitted height exemptions contained within the definition or an advice note.	
31	14.5.2.7 - Minimum building setbacks	Oppose	<p>As set out in section 1.3.4 of this submission, Fire and Emergency have concerns around the increased risk of fire spreading as a result of reduced boundary setbacks. Reduced setbacks can inhibit Fire and Emergency personnel from getting to the fire source or other emergency. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area.</p> <p>Fire and Emergency acknowledge that firefighting access requirements and building setback controls are managed through the New Zealand Building Code (NZBC) however consider it important that these controls are brought to the attention of plan users (i.e. developers) early on in the resource consent process so that they can incorporate the NZBC requirements early on in their building design. Fire and Emergency therefore request that, as a minimum, an advice note is included with built form standard 14.5.2.7 directing plan users to the requirements of the NZBC.</p>	<p>Amend as follows:</p> <p><u><i>Advice note:</i></u> <i>Building setback requirements are further controlled by the Building Code. This includes the provision for firefighter access to buildings and egress from buildings. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</i></p>
32	14.5.2.14 – Water supply for fire fighting	Support	Fire and Emergency support the introduction of 14.5.2.14(b) into the built form standard for firefighting water supply as it requires non-reticulated water supply to be compliant with the alternative firefighting water sources provisions of SNZ PAS 4509:2008.	Retain as notified.
Sub-chapter 14.6 – Rules – High Density Residential Chapter				
33	14.6.1.3. Restricted Discretionary activity RD1	Support	<p>Fire and Emergency support the permitted activities list in Rule 14.6.1.1 being subject to performance standard 14.6.2.13 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 14.15.8 that requires consideration of whether sufficient</p>	<p>14.6.1.3. Restricted Discretionary activity RD1</p> <p>a. Any cultural activity at 52 Rolleston Avenue (Lot 2 DP 496200), that does not meet one or more of the built form standards in Rule 14.6.2.</p>

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided. Fire and Emergency however note an error in the numbering in 14.6.1.3 RD1 and request this be amended as per the relief sought.	b. Any application arising from Rule 14.6.2. 42 13 shall not be publicly notified.
34	14.6.1.3. Restricted Discretionary activity RD4	Support in part	<p>Fire and Emergency support the permitted activities list in Rule 14.6.1.1 being subject to performance standard 14.6.2.13 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 14.15.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided.</p> <p>Fire and Emergency however note an error in the numbering in 14.6.1.6 RD4 and request this be amended as per the relief sought.</p>	<p>Amend as follows:</p> <ol style="list-style-type: none"> Any new building, or alteration or addition to an existing building for a retirement village that meet the following built form standards: <ol style="list-style-type: none"> Rule 14.6.2.1 Building height Rule 14.6.2.2 Height in relation to boundary Rule 14.6.2.43 Setbacks Rule 14.6.2.13 Water supply for firefighting Any application arising from this rule shall not be limited or publicly notified. <p>Council's discretion shall be limited to the following matters: Retirement villages – Rule 14.15.10</p>
35	14.6.1.3. Restricted Discretionary activity RD5	Support in part	<p>Fire and Emergency support the permitted activities list in Rule 14.6.1.1 being subject to performance standard 14.6.2.13 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 14.15.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided. Fire and Emergency however note an error in the numbering in 14.6.1.3 RD5 and request this be amended as per the relief sought.</p>	<p>Amend as follows:</p> <ol style="list-style-type: none"> Any new building, or alteration or addition to an existing building for a retirement village that does not meet one or more of the following built form standards: <ol style="list-style-type: none"> 14.6.2.1 Building height Rule 14.6.2.2 Height in relation to boundary Rule 14.6.2.43 Setbacks Rule 14.6.2.13 Water supply for firefighting Any application arising from Rule 14.6.2.3 shall not be limited or publicly notified. Any application arising from Rule 14.6.2.123 shall not be publicly notified and shall be

ID	Proposed provision	Support /Oppose	Submission	Requested relief
				limited notified only to Fire and Emergency New Zealand (absent its written approval).
36	14.6.2.1 Building height	Support in part	<p>Fire stations are typically single storied buildings of approximately 8-9m in height, and emergency service towers and communication poles can be around 12 to 15 metres in height. The emergency service towers and communication poles serve several purposes being for hose drying, communications and training purposes on station. The need for emergency service towers and communication poles required at stations is dependent on locational and operational requirements of each station.</p> <p>Fire and Emergency is seeking an exemption for emergency service facilities, emergency service towers and communication poles in order to appropriately provide for the health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations and associated structures.</p> <p>This exemption could either be provided under the permitted height exemptions contained within the definition or an advice note.</p>	<p>Amend as follows:</p> <p>Advice note:</p> <ol style="list-style-type: none"> 1. See the permitted height exceptions contained within the definition of height 2. <u>Emergency service facilities, emergency service towers and communication poles are exempt from this rule.</u>
37	14.6.2.3 – Setbacks	Oppose in part	<p>As set out in section 1.3.4 of this submission, Fire and Emergency have concerns around the increased risk of fire spreading as a result of reduced boundary setbacks. Reduced setbacks can inhibit Fire and Emergency personnel from getting to the fire source or other emergency. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area.</p> <p>Fire and Emergency acknowledge that firefighting access requirements and building setback controls are managed through the New Zealand Building Code (NZBC) however consider it important that these controls are brought to the attention of plan users (i.e. developers) early on in the resource consent process so that they can incorporate the</p>	<p>Amend as follows:</p> <p>Advice note:</p> <p><u>Building setback requirements are further controlled by the Building Code. This includes the provision for firefighter access to buildings and egress from buildings. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</u></p>

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			NZBC requirements early on in their building design. Fire and Emergency therefore request that, as a minimum, an advice note is included with built form standard 14.6.2.3 directing plan users to the requirements of the NZBC.	
38	14.6.2.13 - Water supply for firefighting	Support	Fire and Emergency support the introduction of 14.6.2.13(b) into the built form standard for firefighting water supply as it requires non-reticulated water supply to be provided in accordance with SNZ PAS 4509:2008.	Retain as notified.
Sub-chapter 14.7 – Rules - Residential Hills Zone				
39	14.7.1.3 Restricted discretionary activities RD18	Support in part	<p>Fire and Emergency support the permitted activities list in Rule 14.7.1.1 being subject to performance standard 14.7.2.11 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 14.15.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided.</p> <p>Fire and Emergency however note an error in the numbering in 14.7.1.3 RD18 and request this be amended as per the relief sought.</p>	<p>Amend as follows:</p> <p>Council's discretion shall be limited to the following matter:</p> <p>a. Water supply for fire fighting – Rule 14.15.78</p>
Sub-chapter 14.8 – Rules – Residential Banks Peninsula Zone				
40	14.8.1.3 Restricted discretionary RD9	Support in part	<p>Fire and Emergency support the permitted activities list in Rule 14.8.1.3 being subject to performance standard 14.8.2.7 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 14.15.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided.</p>	<p>Amend as follows:</p> <p>Council's discretion shall be limited to the following matter:</p> <p>a. Water supply for fire fighting – Rule 14.15.78</p>

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			Fire and Emergency however note an error in the numbering in 14.8.1.3 RD9 and request this be amended as per the relief sought	
Sub-chapter 14.9 – Rules – Residential Large Lot Zone				
41	14.9.1.3. Restricted discretionary activities RD15	Support in part	<p>Fire and Emergency support the permitted activities list is 14.9.1.1 being subject to performance standard 14.9.2.8 that requires a water supply for firefighting. Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 14.15.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided.</p> <p>Fire and Emergency however note an error in the numbering in 14.9.1.3 RD15 and request this be amended as per the relief sought.</p>	<p>Amend as follows: Council's discretion is restricted to:</p> <p>a. Water supply for fire fighting – Rule 14.15-78</p>
42	14.9.2.5 Minimum building setbacks from internal boundaries	Oppose in part	<p>As set out in section 1.3.4 of this submission, Fire and Emergency have concerns around the increased risk of fire spreading as a result of reduced boundary setbacks. Reduced setbacks can inhibit Fire and Emergency personnel from getting to the fire source or other emergency. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area.</p> <p>Fire and Emergency acknowledge that firefighting access requirements and building setback controls are managed through the New Zealand Building Code (NZBC) however consider it important that these controls are brought to the attention of plan users (i.e. developers) early on in the resource consent process so that they can incorporate the NZBC requirements early on in their building design. Fire and Emergency therefore request that, as a minimum, an advice note is included with built form standard 14.9.2.5 directing plan users to the requirements of the NZBC.</p>	<p>Amend as follows:</p> <p><u><i>Advice note:</i></u> <u><i>Building setback requirements are further controlled by the Building Code. This includes the provision for firefighter access to buildings and egress from buildings. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</i></u></p>

ID	Proposed provision	Support /Oppose	Submission	Requested relief
Sub-chapter 14.12 Rules – Future Urban Zone				
43	14.12.2.1 Building height	Oppose in part	<p>Fire stations are typically single storied buildings of approximately 8-9m in height, and emergency service towers and communication poles can be around 12 to 15 metres in height. The emergency service towers, and communication poles serve several purposes being for hose drying, communications and training purposes on station. The need for emergency service towers and communication poles required at stations is dependent on locational and operational requirements of each station.</p> <p>Fire and Emergency is seeking an exemption for emergency service facilities, emergency service towers and communication poles in order to appropriately provide for the health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations and associated structures.</p> <p>This exemption could either be provided under the permitted height exemptions contained within the definition or an advice note.</p>	<p>Amend as follows:</p> <p><u>Advice note:</u></p> <ol style="list-style-type: none"> 1. See the permitted height exceptions contained within the definition of height 2. <u>Emergency service facilities, emergency service towers and communication poles are exempt from this rule.</u>
44	14.12.2.5 Minimum building setbacks from internal boundaries and railway lines	Oppose in part	<p>As set out in section 1.3.4 of this submission, Fire and Emergency have concerns around the increased risk of fire spreading as a result of reduced boundary setbacks. Reduced setbacks can inhibit Fire and Emergency personnel from getting to the fire source or other emergency. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area.</p> <p>Fire and Emergency acknowledge that firefighting access requirements and building setback controls are managed through the New Zealand Building Code (NZBC) however consider it important that these controls are brought to the attention of plan users (i.e. developers) early on in the resource consent process so that they can incorporate the NZBC requirements early on in their building design.</p>	<p>Amend as follows:</p> <ol style="list-style-type: none"> a. The minimum building setback from internal boundaries shall be as follows: e. b. For a retirement village or a comprehensive residential development, this rule applies only to the internal boundaries on the perimeter of the entire development. d. c. For the purposes of this rule, this excludes guttering up to 200mm in width from the wall of a building. <p><u>Advice note:</u> <u>Building setback requirements are further controlled by the Building Code. This includes the provision for firefighter access to buildings and egress from</u></p>

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			<p>Fire and Emergency therefore request that, as a minimum, an advice note is included with built form standard 14.12.2.5 directing plan users to the requirements of the NZBC.</p> <p>For clarity, Fire and Emergency request that the clauses are updated to be in sequential order.</p>	<p><u>buildings. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</u></p>
Sub-chapter 14.15 Rules – Matters of control and discretion				
45	14.15.1 - Residential design principles	Support in part	Fire and Emergency seeks reference to emergency access on site.	<p>Amend as follows:</p> <p>...</p> <p>g. Access, parking and servicing</p> <ol style="list-style-type: none"> i. Whether the development provides for good, safe access and integration of space for pedestrian movement, cyclist servicing, and parking (where provided). ii. The relevant considerations are the extent to which the development: <ol style="list-style-type: none"> A. integrates access in a way that is safe for all users, and offers direct and convenient access for pedestrians and cyclists from the street to the front door of each unit; B. provides effective physical separation between vehicles and any dedicated pedestrian access; C. when parking areas and garages are provided, these are designed and located in a way that does not dominate the development, particularly when viewed from the street or other public open spaces; D. when no on-site car parking is provided, the movement of people and car-free modes of travel are facilitated, including accesses that are of sufficient width and standard of formation to be used by people with differing mobility needs; and

ID	Proposed provision	Support /Oppose	Submission	Requested relief
				<p>E. provides for suitable storage (including bike storage) and service spaces which are conveniently accessible for people with differing mobility needs, safe and/or secure, and located and/or designed to minimise adverse effects on occupants, neighbours and public spaces.</p> <p>iii. <u>Whether the development provides for appropriate emergency access on/to the site:</u></p> <p><u>A. The extent to which access to the on-site alternative firefighting water supply complies with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.</u></p> <p><u>B. The extent to which developments provide for emergency service access including pedestrian accessways that are clear, unobstructed and well lit</u></p> <p><u>C. The extent to which wayfinding for different properties on a development are clear in day and night is provided.</u></p>
46	14.15.3 Impacts on neighbouring property	Support in part	<p>Fire and Emergency note the importance to maintain firefighting water supply pressure throughout high rise buildings. Fire and Emergency seek that Council consider this as a matter of discretion when compliance is not achieved.</p> <p>Fire and Emergency are concerned by the risk of fire spreading due to setbacks from boundaries. It can inhibit Fire and Emergency personnel from getting to the fire source.</p> <p>Fire and Emergency seek that Council consider this as an additional matter of discretion as outlined in the relief sought.</p>	<p>Amend as follows:</p> <p>...</p> <p><u>viii. Fire risk mitigation incorporated to avoid horizontal spread of fire across boundaries; and</u></p> <p><u>ix. Provision of suitable firefighting water supply and pressure.</u></p>
47	14.15.8 - Water supply for fire fighting	Support	Fire and Emergency support the matter of discretion 14.15.8 that requires consideration of whether sufficient firefighting water supply to ensure the	Retain as notified.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			health and safety of the community, including neighbouring properties is provided.	
48	14.15.27 Character Area Overlay	Oppose in part	<p>Fire and Emergency are seeking the removal of 91 Chester Street East from the RHA 2 to enable development within the site without potential functional, time and cost constraints. This will enable Fire and Emergency to carry out their duty to provide for the health and safety of people and communities in Christchurch.</p> <p>For clarity however, Fire and Emergency seeks that the clauses are appropriately updated to be in sequential order where a clause has been removed or added.</p>	See sought relief in section 1.2.
Chapter 15 – Commercial				
49	15.2.4 Objective - Urban form, scale and design outcomes	Support	Fire and Emergency support the urban form, scale and design outcomes objective as 15.2.4. (a) ii. recognises the functional and operational requirements of activities and the anticipated built form. As Emergency service facilities are permitted within this zone, it is considered that the functional and operational requirements of Fire and Emergency are anticipated in this zone.	Retain as notified.
15.4 Rules – Town Centre Zone				
50	15.4.2.2 Maximum building height	Support	Fire stations are typically single storied buildings of approximately 8-9m in height, and emergency service towers and communication poles can be around 12 to 15 metres in height. The emergency service towers, and communication poles serve several purposes being for hose drying, communications and training purposes on station. The need for emergency service towers and communication poles required at stations is dependent on locational and operational requirements of each station.	Retain as notified.
51	15.4.2.8 - Water supply for fire fighting	Support	Fire and Emergency support the introduction of 15.4.2.8(b) into the built form standard for firefighting water supply as it requires non-reticulated water	Retain as notified.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			supply to be compliant with the alternative firefighting water sources provisions of SNZ PAS 4509:2008.	
15.5 Rules – Local Centre Zone				
52	15.5.2.2 - Maximum building height	Support in part.	<p>Fire stations are typically single storied buildings of approximately 8-9m in height, and emergency service towers and communication poles can be around 12 to 15 metres in height. The emergency service towers, and communication poles serve several purposes being for hose drying, communications and training purposes on station. The need for emergency service towers and communication poles required at stations is dependent on locational and operational requirements of each station.</p> <p>Fire and Emergency is seeking an exemption for emergency service facilities, emergency service towers and communication poles in order to appropriately provide for the health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations and associated structures.</p> <p>This exemption could either be provided under the permitted height exemptions contained within the definition or an advice note.</p>	<p>Amend as follows:</p> <p><u>Advice note:</u></p> <ol style="list-style-type: none"> 1. <u>See the permitted height exceptions contained within the definition of height</u> 2. <u>Emergency service facilities, emergency service towers and communication poles are exempt from this rule.</u>
53	15.5.2.8 - Water supply for fire fighting	Support	Fire and Emergency support the inclusion of the built form standard 15.5.2.8(b) which requires non-reticulated water supply for firefighting be provided in accordance with SNZ PAS 4509:2008.	Retain as notified.
15.6 Rules – Neighbourhood Centre Zone				
54	15.6.2.1 - Maximum building height	Support in part	<p>Fire stations are typically single storied buildings of approximately 8-9m in height, and emergency service towers and communication poles can be around 12 to 15 metres in height. The emergency service towers, and communication poles serve several purposes being for hose drying, communications and training purposes on station. The need for emergency service towers and</p>	<p>Amend as follows:</p> <p><u>Advice note:</u></p> <ol style="list-style-type: none"> 1. <u>See the permitted height exceptions contained within the definition of height</u> 2. <u>Emergency service facilities, emergency service towers and communication poles are exempt from this rule.</u>

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			<p>communication poles required at stations is dependent on locational and operational requirements of each station.</p> <p>Fire and Emergency is seeking an exemption for emergency service facilities, emergency service towers and communication poles in order to appropriately provide for the health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations and associated structures.</p> <p>This exemption could either be provided under the permitted height exemptions contained within the definition or an advice note.</p>	
55	15.6.2.7 - Water supply for fire fighting	Support	Fire and Emergency support the inclusion of built form standard 15.6.2.7(b) which requires non-reticulated water supply for firefighting be provided in accordance with SNZ PAS 4509:2008.	Retain as notified.
15.7 Rules – Commercial Banks Peninsula Zone				
56	15.7.2.4 - Minimum building setback from the boundary with a Residential Zone	Support	Fire and Emergency support the minimum setbacks from the boundary specified in Rule 15.7.2.4(a) as they may enable Fire and Emergency personnel to get to the fire source and reduce the risk of fire spread.	Retain as notified.
57	15.7.2.7 - Water supply for fire fighting	Support	Fire and Emergency support the inclusion of built form standard 15.7.2.7(b) which requires non-reticulated water supply for firefighting be provided in accordance with SNZ PAS 4509:2008.	Retain as notified.
15.8 Rules – Large Format Retail Zone				
58	15.8.1.3 Restricted discretionary activities RD1	Support	<p>Fire and Emergency support the permitted activities list is Rule 15.8.1.1 being subject to performance standard 15.8.2.7 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 15.14.3.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and</p>	Retain as notified.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			safety of the community, including neighbouring properties is provided.	
59	15.8.2.7 Water supply for fire fighting	Support in part	<p>Fire and Emergency supports the inclusion of built form standard 15.8.2.7(b) which requires water supply for firefighting be provided in accordance with SNZ PAS 4509:2008.</p> <p>Fire and Emergency seek that 'New Zealand Fire Service Commission' is amended to 'Fire and Emergency New Zealand'.</p>	<p>Amend as follows:</p> <p>c. Any application arising from this rule shall not be publicly notified and shall be limited notified only to New Zealand Fire Service Commission <u>Fire and Emergency New Zealand</u> (absent its written approval).</p>
15.9 Rules – Commercial Office Zone				
60	15.9.1.3 Restricted discretionary activities RD1	Support	<p>Fire and Emergency support the permitted activities list is Rule 15.9.1.1 being subject to performance standard 15.9.2.7 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 15.14.3.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided.</p>	Retain as notified.
15.10 Rules – Mixed Use Zone				
61	15.10.1.3 Restricted discretionary activities RD1	Support	<p>Fire and Emergency support the permitted activities list is Rule 15.10.1.1 being subject to performance standard 15.10.2.7 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 15.14.3.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided.</p>	Retain as notified.
62	15.10.2.1 Maximum building height	Support	Fire stations are typically single storied buildings of approximately 8-9m in height, and emergency service towers and communication poles can be around 12 to 15 metres in height. The emergency	Retain as notified.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			service towers, and communication poles serve several purposes being for hose drying, communications and training purposes on station. The need for emergency service towers and communication poles required at stations is dependent on locational and operational requirements of each station.	
63	15.10.2.3 - Minimum building setback from residential zones and internal boundaries	Support	Fire and Emergency support the minimum setbacks from the boundary specified in Rule 15.10.2.3(a) as they may enable Fire and Emergency personnel to get to the fire source and reduce the risk of fire spread.	Retain as notified.
64	15.10.2.7 - Water supply for fire fighting	Support	Fire and Emergency support the inclusion of Rule 15.10.2.7(b) which requires non-reticulated water supply for firefighting be provided in accordance with SNZ PAS 4509:2008.	Retain as notified.
65	15.10.2.9 - Minimum standards for Comprehensive Residential Development	Support in part	Fire and Emergency seeks reference to emergency access on site to the extent that it requires either a combined vehicle-pedestrian access or a dedicated pedestrian access with associated minimum standards. Fire and Emergency request that these minimum standards be amended to provide for emergency responder access for reasons set out in Section 1.3.1 above.	<p>Amend as follows:</p> <ul style="list-style-type: none"> a. All shared pedestrian access ways within and through a site shall: <ul style="list-style-type: none"> i. have a minimum width of <ul style="list-style-type: none"> A. 3 metres on a straight accessway including excluding planting. B. 6.2 metres on a curved or cornered accessway C. 4.5m space to position the ladder and perform operational tasks. ii. The width for pedestrian access shall be clear of any fencing, storage or servicing, except security gates, where necessary. iii. provide wayfinding for different properties on a development are clear in day and night.

15.11 Rules – City Centre Zone

ID	Proposed provision	Support /Oppose	Submission	Requested relief
66	15.11.1.3. Restricted discretionary activity RD5	Support	Fire and Emergency support the permitted activities list in Rule 15.11.1.1 being subject to performance standard 15.11.2.13 that requires a water supply for firefighting. Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 15.14.3.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided.	Retain as notified.
67	15.11.2.13 - Water supply for fire fighting	Support in part	Fire and Emergency support the addition of 15.11.2.13(b) which requires non-reticulated water supply for firefighting be provided in accordance with SNZ PAS 4509:2008. A minor amendment is sought to 15.11.2.13(c) to update reference from 'New Zealand Fire Service Commission' to 'Fire and Emergency New Zealand'.	Amend as follows: c. Any application arising from this rule shall not be publicly notified. Limited notification, if required, shall only be to Fire and Emergency New Zealand the New Zealand Fire Service Commission (absent its written approval).
15.12 Rules – Central City Mixed Use Zone				
68	15.12.1.3 Restricted discretionary activities RD2	Support	Fire and Emergency support the permitted activities listed in Rule 15.12.1.1 being subject to performance standard 15.12.2.8 that requires a water supply for firefighting. Where compliance is not achieved, Fire and Emergency support the restricted discretionary activity status and the supporting matter of discretion 15.14.3.8 that requires consideration of whether sufficient firefighting water supply is available to ensure the health and safety of the community, including neighbouring properties.	Retain as notified.
69	15.12.2.7 - Minimum setback from the boundary with a residential zone or from an internal boundary	Support	Fire and Emergency support the minimum setbacks from the boundary specified in Rule 15.12.2.7(a) as they may enable Fire and Emergency personnel to get to the fire source and reduce the risk of fire spread.	Retain as notified.
70	15.12.2.8 Water supply for fire fighting	Support in part	Fire and Emergency support the addition of Rule 15.12.2.8(b) which requires non-reticulated water	Amend as follows:

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			supply for firefighting beprovided in accordance with SNZ PAS 4509:2008. A minor amendment is sought to 15.12.2.8(c) to update reference from New Zealand Fire Service Commission to 'Fire and Emergency New Zealand'.	..; Any application arising from this rule shall not be publicly notified and shall be limited notified only to New Zealand Fire Service Commission <u>Fire and Emergency New Zealand</u> (absent its written approval).
15.13 Rules – Central City Mixed Use Zone (South Frame)				
71	15.13.1.3 Restricted discretionary activities RD5	Support	Fire and Emergency support the permitted activities listed in 15.13.1 being subject to performance standard 15.13.2.9 that requires a water supply for firefighting. Where compliance is not achieved, Fire and Emergency support the restricted discretionary activity status and the supporting matter of discretion 15.14.3.8 that requires consideration of whether sufficient firefighting water supply is available to ensure the health and safety of the community, including neighbouring properties.	Retain as notified.
72	15.13.2.9 - Water supply for fire fighting	Support in part	Fire and Emergency support the addition of 15.13.2.9(b) which ensures that non-reticulated water supply for firefighting is provided in accordance with SNZ PAS 4509:2008. A minor amendment is sought to 15.13.2.9(c) to update reference from New Zealand Fire Service Commission to 'Fire and Emergency New Zealand'.	Amend as follows: ... Any application arising from this rule shall not be publicly notified and shall be limited notified only to New Zealand Fire Service Commission <u>Fire and Emergency New Zealand</u> (absent its written approval).

Please click on the link below to view the document

[https://makeasubmission.ccc.govt.nz:443/manage/Docs/PID_294/294_15823TQN60A_Fire and Emergency New Zealand - Small Fiona - Small Fiona - Plan Change 14 to Christchurch Plan Submission - FENZ.PDF](https://makeasubmission.ccc.govt.nz:443/manage/Docs/PID_294/294_15823TQN60A_Fire_and_Emergency_New_Zealand_-_Small_Fiona_-_Small_Fiona_-_Plan_Change_14_to_Christchurch_Plan_Submission_-_FENZ.PDF)

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Allan


Last name:

Taunt

Preferred method of contact

Email

Attached Documents

Name	
Allan	

Robson, Gina

From: Generation Zero <noreply@123formbuilder.com>
Sent: Friday, 12 May 2023 9:43 pm
To: Engagement
Subject: CCC District Plan Changes (PC14) - Generation Zero Quick Submit / 531

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

Form Summary

1. First / Last name	Allan Taunt
2. Email address	allan.taunt@hotmail.com
3. Postal Address	92 Regency Crescent Christchurch 8051
4. Trade competition/adverse effects:	Option 1: I could not gain in trade competition through this submission
5. Answer if you selected option 2 above:	Are you directly affected by a possible effect of this plan change in a way that it: a. adversely affects the environment, and b. does not relate to the trade competition or the effects of trade competitions
Chapter 6 - Tree Canopy Cover and Financial Contributions	<p>The council will require 20% of new residential developments to be covered by trees, or otherwise pay a financial contribution to help the council plant more trees on public land. Christchurch has an appallingly low tree canopy cover rate of 13% compared to Auckland (18%) and Wellington (30%). Trees have a wide range of environmental, health, social and economic benefits and are important for the future of our city.</p> <p>I support the Tree Canopy Cover rules and Financial Contributions to restore our tree canopy. Trees are important in reducing emissions,</p>

Form Summary

providing shade and temperature control in the summer, alongside the other wide range of economic, health and social effects. I seek that the council retains the tree canopy requirement and contributions plan.

Chapter 14 - Low Public Transport Accessibility Area Qualifying Matter

The council plans to restrict housing in some areas of the city because they are poorly serviced by the lack of current high frequency public transport routes. Some areas solely designated with this qualifying matter such as in Casebrook and Styx are close to rail corridors, existing commercial areas and are serviced by low frequency routes. In the future, these areas could see a boost in service by more buses on current routes or introduction of a commuter rail service.

I oppose the Low Public Transport Accessibility Area Qualifying Matter as I believe that the public transport layout and network will need changes to prepare and accommodate future growth. We should not define future growth in Christchurch based on these routes. This would also artificially limit future housing in our city. I seek that the council drop this qualifying matter.

Chapter 14 - Sunlight Access Qualifying Matter

There are many cities in the world that have high density and are further from the equator than Christchurch. Cities such as Vienna, Copenhagen, Toronto, Geneva, and Calgary are consistently ranked some of the most livable cities in the world. This qualifying matter would reduce the maximum height and size of medium residential buildings below what is legally required. This qualifying matter has been developed with the expressed purpose of protecting and increasing property values rather than increasing the amount of affordable housing for people.

I oppose the Sunlight Access Qualifying Matter. There are many cities in the Northern Hemisphere that are further away from the equator and have a higher level of housing intensification than Christchurch. With a mix of medium and high density housing, these cities are considered some of the most livable cities in the world. This qualifying matter would restrict medium density housing height and size in such a way that would create a less efficient usage of land and limit future housing. I seek that the council drop this qualifying matter.

Chapter 14 - High-Density Residential Zone

The council is required by law to allow residential buildings of at least 6 storeys within a 1.2km radius of commercial centres such as malls and the city centre. The council plan to enable this, while also allowing up to 10 storeys for residential buildings closer to the city centre. This would enable a wider range of dense housing development options. It would also allow more people to live close to services and amenities.

I support high-density housing near the city and commercial centres. We need to allow more people to live near services and amenities to reduce car dependency. This would allow more people to take active and public transport to commute, shop and play. I seek that the council enable 6 to 10 storeys for residential buildings near commercial centres.

Form Summary**Any other comments?**

The message has been sent from 122.61.175.144 nz at 2023-05-12 on iPhone unknown

Entry ID: 204

Referrer: <http://m.facebook.com/>

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

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Hayden


Last name:

Smythe

Preferred method of contact

Email

Attached Documents

Name	
Hayden	

Robson, Gina

From: Generation Zero <noreply@123formbuilder.com>
Sent: Friday, 12 May 2023 7:03 pm
To: Engagement
Subject: CCC District Plan Changes (PC14) - Generation Zero Quick Submit / 531

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

Form Summary

1. First / Last name	Hayden Smythe
2. Email address	mcqgj47b@duck.com
3. Postal Address	1a James Condon Place Redwood Christchurch 8051
4. Trade competition/adverse effects:	Option 1: I could not gain in trade competition through this submission
5. Answer if you selected option 2 above:	Are you directly affected by a possible effect of this plan change in a way that it: a. adversely affects the environment, and b. does not relate to the trade competition or the effects of trade competitions
Chapter 6 - Tree Canopy Cover and Financial Contributions	<p>The council will require 20% of new residential developments to be covered by trees, or otherwise pay a financial contribution to help the council plant more trees on public land. Christchurch has an appallingly low tree canopy cover rate of 13% compared to Auckland (18%) and Wellington (30%). Trees have a wide range of environmental, health, social and economic benefits and are important for the future of our city.</p> <p>I support the Tree Canopy Cover rules and Financial Contributions to restore our tree canopy. Trees are important in reducing emissions,</p>

Form Summary

providing shade and temperature control in the summer, alongside the other wide range of economic, health and social effects. I seek that the council retains the tree canopy requirement and contributions plan.

Chapter 14 - Low Public Transport Accessibility Area Qualifying Matter

The council plans to restrict housing in some areas of the city because they are poorly serviced by the lack of current high frequency public transport routes. Some areas solely designated with this qualifying matter such as in Casebrook and Styx are close to rail corridors, existing commercial areas and are serviced by low frequency routes. In the future, these areas could see a boost in service by more buses on current routes or introduction of a commuter rail service.

I oppose the Low Public Transport Accessibility Area Qualifying Matter as I believe that the public transport layout and network will need changes to prepare and accommodate future growth. We should not define future growth in Christchurch based on these routes. This would also artificially limit future housing in our city. I seek that the council drop this qualifying matter.

Chapter 14 - Sunlight Access Qualifying Matter

There are many cities in the world that have high density and are further from the equator than Christchurch. Cities such as Vienna, Copenhagen, Toronto, Geneva, and Calgary are consistently ranked some of the most livable cities in the world. This qualifying matter would reduce the maximum height and size of medium residential buildings below what is legally required. This qualifying matter has been developed with the expressed purpose of protecting and increasing property values rather than increasing the amount of affordable housing for people.

I oppose the Sunlight Access Qualifying Matter. There are many cities in the Northern Hemisphere that are further away from the equator and have a higher level of housing intensification than Christchurch. With a mix of medium and high density housing, these cities are considered some of the most livable cities in the world. This qualifying matter would restrict medium density housing height and size in such a way that would create a less efficient usage of land and limit future housing. I seek that the council drop this qualifying matter.

Chapter 14 - High-Density Residential Zone

The council is required by law to allow residential buildings of at least 6 storeys within a 1.2km radius of commercial centres such as malls and the city centre. The council plan to enable this, while also allowing up to 10 storeys for residential buildings closer to the city centre. This would enable a wider range of dense housing development options. It would also allow more people to live close to services and amenities.

I support high-density housing near the city and commercial centres. We need to allow more people to live near services and amenities to reduce car dependency. This would allow more people to take active and public transport to commute, shop and play. I seek that the council enable 6 to 10 storeys for residential buildings near commercial centres.

Form Summary**Any other comments?**

The message has been sent from 119.224.85.210 nz at 2023-05-12 on Chrome 112.0.5615.135
Entry ID: 201
Referrer: <https://www.generationzero.org/>
Form Host: <https://form.123formbuilder.com/6423130/ccc-district-plan-changes-pc14-generation-zero>

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 03/05/2023

First name: Christopher

Last name: Evan

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 6 General Rules and Procedures

Oppose

I seek the following decision from the Council

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

My submission is that:

I suggest Christchurch City Council accepts the new Government rules and laws -6.1A.

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 suggest Christchurch City Council accepts the new Government rules and laws-14.5/14.6.

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council




Submitter Details

Submission Date: 12/05/2023

First name: Lauren **Last name:** Bonner

Preferred method of contact Email

Attached Documents

Name	
Lauren	

Robson, Gina

From: Generation Zero <noreply@123formbuilder.com>
Sent: Friday, 12 May 2023 5:34 pm
To: Engagement
Subject: CCC District Plan Changes (PC14) - Generation Zero Quick Submit / 531

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

Form Summary

1. First / Last name	Lauren Bonner
2. Email address	yellow.squizzel@gmail.com
3. Postal Address	52 Dover Street St Albans Christchurch 8014
4. Trade competition/adverse effects:	Option 1: I could not gain in trade competition through this submission
5. Answer if you selected option 2 above:	Are you directly affected by a possible effect of this plan change in a way that it: a. adversely affects the environment, and b. does not relate to the trade competition or the effects of trade competitions
Chapter 6 - Tree Canopy Cover and Financial Contributions	<p>The council will require 20% of new residential developments to be covered by trees, or otherwise pay a financial contribution to help the council plant more trees on public land. Christchurch has an appallingly low tree canopy cover rate of 13% compared to Auckland (18%) and Wellington (30%). Trees have a wide range of environmental, health, social and economic benefits and are important for the future of our city.</p> <p>I support the Tree Canopy Cover rules and Financial Contributions to restore our tree canopy. Trees are important in reducing emissions,</p>

Form Summary

providing shade and temperature control in the summer, alongside the other wide range of economic, health and social effects. I seek that the council retains the tree canopy requirement and contributions plan.

Chapter 14 - Low Public Transport Accessibility Area Qualifying Matter

The council plans to restrict housing in some areas of the city because they are poorly serviced by the lack of current high frequency public transport routes. Some areas solely designated with this qualifying matter such as in Casebrook and Styx are close to rail corridors, existing commercial areas and are serviced by low frequency routes. In the future, these areas could see a boost in service by more buses on current routes or introduction of a commuter rail service.

I oppose the Low Public Transport Accessibility Area Qualifying Matter as I believe that the public transport layout and network will need changes to prepare and accommodate future growth. We should not define future growth in Christchurch based on these routes. This would also artificially limit future housing in our city. I seek that the council drop this qualifying matter.

Chapter 14 - Sunlight Access Qualifying Matter

There are many cities in the world that have high density and are further from the equator than Christchurch. Cities such as Vienna, Copenhagen, Toronto, Geneva, and Calgary are consistently ranked some of the most livable cities in the world. This qualifying matter would reduce the maximum height and size of medium residential buildings below what is legally required. This qualifying matter has been developed with the expressed purpose of protecting and increasing property values rather than increasing the amount of affordable housing for people.

I oppose the Sunlight Access Qualifying Matter. There are many cities in the Northern Hemisphere that are further away from the equator and have a higher level of housing intensification than Christchurch. With a mix of medium and high density housing, these cities are considered some of the most livable cities in the world. This qualifying matter would restrict medium density housing height and size in such a way that would create a less efficient usage of land and limit future housing. I seek that the council drop this qualifying matter.

Chapter 14 - High-Density Residential Zone

The council is required by law to allow residential buildings of at least 6 storeys within a 1.2km radius of commercial centres such as malls and the city centre. The council plan to enable this, while also allowing up to 10 storeys for residential buildings closer to the city centre. This would enable a wider range of dense housing development options. It would also allow more people to live close to services and amenities.

I support high-density housing near the city and commercial centres. We need to allow more people to live near services and amenities to reduce car dependency. This would allow more people to take active and public transport to commute, shop and play. I seek that the council enable 6 to 10 storeys for residential buildings near commercial centres.

Form Summary**Any other comments?**

Build for the future Christchurch, duh.

The message has been sent from 125.238.247.79 nz at 2023-05-12 on Chrome 113.0.0.0

Entry ID: 200

Referrer: <https://www.reddit.com/>

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

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Will


Last name:

Struthers

Preferred method of contact

Email

Attached Documents

Name	
Will	

Robson, Gina

From: Generation Zero <noreply@123formbuilder.com>
Sent: Friday, 12 May 2023 2:24 pm
To: Engagement
Subject: CCC District Plan Changes (PC14) - Generation Zero Quick Submit / 531

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

Form Summary

1. First / Last name	Will Struthers
2. Email address	will.struthers92@gmail.com
3. Postal Address	11 Barnes Road Redwood Christchurch 8051
4. Trade competition/adverse effects:	Option 1: I could not gain in trade competition through this submission
5. Answer if you selected option 2 above:	Are you directly affected by a possible effect of this plan change in a way that it: a. adversely affects the environment, and b. does not relate to the trade competition or the effects of trade competitions Option 2: No
Chapter 6 - Tree Canopy Cover and Financial Contributions	The council will require 20% of new residential developments to be covered by trees, or otherwise pay a financial contribution to help the council plant more trees on public land. Christchurch has an appallingly low tree canopy cover rate of 13% compared to Auckland (18%) and Wellington (30%). Trees have a wide range of

Form Summary

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

I support the Tree Canopy Cover rules and Financial Contributions to restore our tree canopy. Trees are important in reducing emissions, providing shade and temperature control in the summer, alongside the other wide range of economic, health and social effects. I seek that the council retains the tree canopy requirement and contributions plan.

Chapter 14 - Low Public Transport Accessibility Area Qualifying Matter

The council plans to restrict housing in some areas of the city because they are poorly serviced by the lack of current high frequency public transport routes. Some areas solely designated with this qualifying matter such as in Casebrook and Styx are close to rail corridors, existing commercial areas and are serviced by low frequency routes. In the future, these areas could see a boost in service by more buses on current routes or introduction of a commuter rail service.

I oppose the Low Public Transport Accessibility Area Qualifying Matter as I believe that the public transport layout and network will need changes to prepare and accommodate future growth. We should not define future growth in Christchurch based on these routes. This would also artificially limit future housing in our city. I seek that the council drop this qualifying matter.

Chapter 14 - Sunlight Access Qualifying Matter

There are many cities in the world that have high density and are further from the equator than Christchurch. Cities such as Vienna, Copenhagen, Toronto, Geneva, and Calgary are consistently ranked some of the most livable cities in the world. This qualifying matter would reduce the maximum height and size of medium residential buildings below what is legally required. This qualifying matter has been developed with the expressed purpose of protecting and increasing property values rather than increasing the amount of affordable housing for people.

I oppose the Sunlight Access Qualifying Matter. There are many cities in the Northern Hemisphere that are further away from the equator and have a higher level of housing intensification than Christchurch. With a mix of medium and high density housing, these cities are considered some of the most livable cities in the world. This qualifying matter would restrict medium density housing height and size in such a way that would create a less efficient usage of land and limit future housing. I seek that the council drop this qualifying matter.

Chapter 14 - High-Density Residential Zone

The council is required by law to allow residential buildings of at least 6 storeys within a 1.2km radius of commercial centres such as malls and the city centre. The council plan to enable this, while also allowing up to 10 storeys for residential buildings closer to the city centre. This would enable a wider range of dense housing development options. It would also allow more people to live close to services and amenities.

Form Summary

I support high-density housing near the city and commercial centres. We need to allow more people to live near services and amenities to reduce car dependency. This would allow more people to take active and public transport to commute, shop and play. I seek that the council enable 6 to 10 storeys for residential buildings near commercial centres.

Any other comments?

The message has been sent from 210.55.227.167 nz at 2023-05-12 on Chrome 112.0.0.0

Entry ID: 199

Referrer: <https://l.facebook.com/>

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

Submitter Details

First name: Richard

Last name: Peebles

Organisation: Peebles Group Limited

Preferred method of contact	Email
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Attached Documents

Name
PC14 submission Cranford St Peebles Group Ltd

Form 5

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

- 1 This is a submission on the proposed plan change 14 (*PC14*) to the Christchurch District Plan (the *District Plan*).
- 2 Peebles Group could not gain an advantage in trade competition through this submission.
- 3 Peebles Group's submission relates to the whole of PC14. However, the specific relief sought by Peebles Group is set out at **Appendix 1** and a summary of their key submission points follows.
- 4 In summary, Peebles Group has interests in the properties at 478-484 Cranford Street, Christchurch which is commonly known as the commercial centre 'Cranford Park'. Under PC14, this property is zoned LCZ, with property to the west and northeast zoned IG (with a brownfield overlay), and residential zoning (MRZ, HRZ and FUZ) to the northwest and on the opposite side of Cranford Stret. To the east of the block is land zoned Rural Urban Fringe (RuUF) and the designated Northern Arterial corridor.
- 5 This submission seeks that the land to the east (at 468-470 Cranford Street) be rezoned LCZ, to provide for the more efficient and effective utilisation of the land resource, than would otherwise occur under RuUF zoning. LCZ would better enable the establishment of business activities in a manner consistent with the NPS-UD including those provisions concerning sufficient development capacity, accessibility, and well functioning urban environments.
- 6 Given the context described above, the RuUF zoning of the land is ineffective, inefficient and inappropriate. Conversely, LCZ zoning is the most appropriate zoning for the land, accounting for the provisions in the NPS-UD, including policies 1, 2, 3 and 4.



Figure 1 – subject land

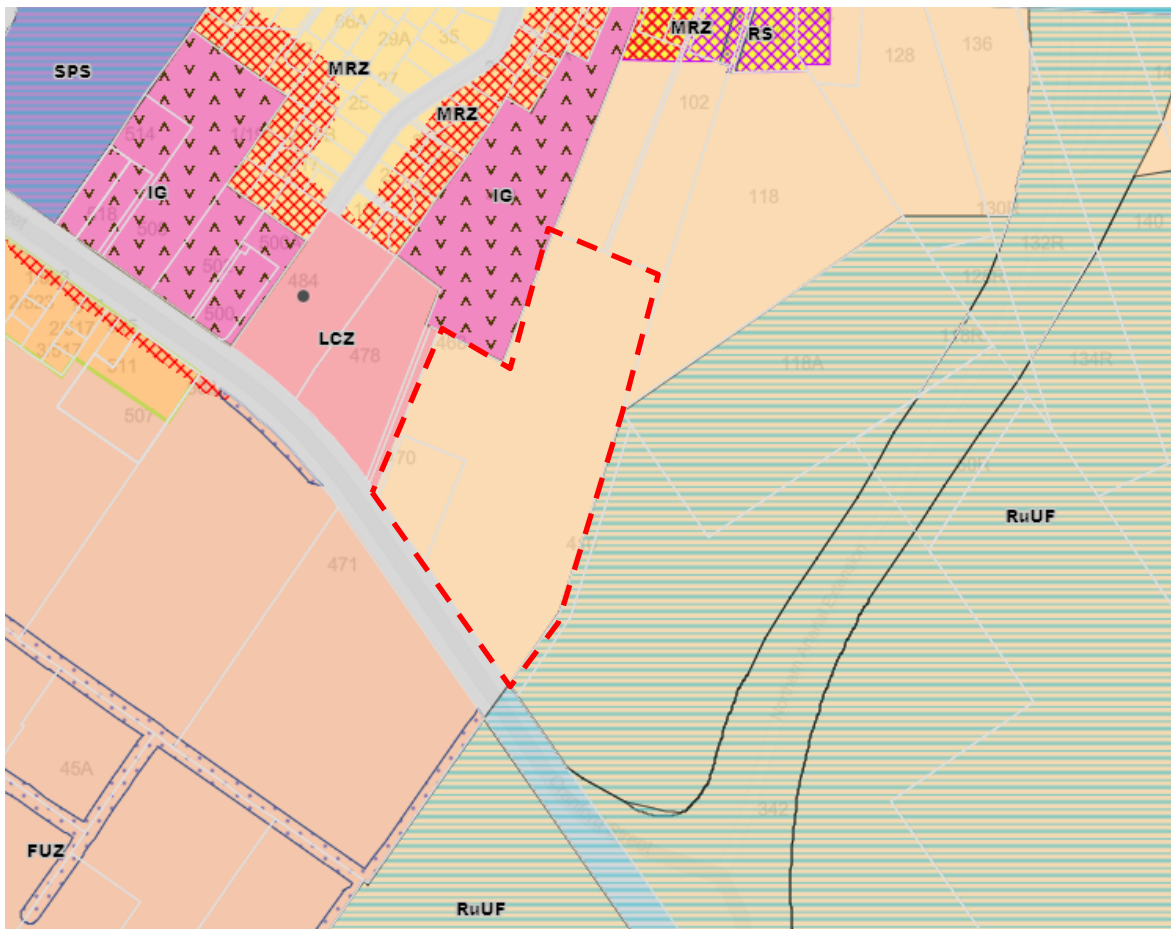


Figure 2 – PC14 proposed zoning of subject land

- 7 Accounting for the above, Peebles Group consider that a LCZ zoning is appropriate for the properties at 468-470 Cranford Street and the planning maps should be amended accordingly.
- 8 The submitter seeks the following decision from the local authority:
- 8.1 The relief as set out in **Annexure A**.
- 8.2 Any other similar relief that would address the relief sought by the submitter.
- 8.3 All necessary consequential amendments.
- 9 Peebles Group wishes to be heard in support of the submission.
- 10 If others make a similar submission, Peebles Group will consider presenting a joint case with them at a hearing.


Signed for and on behalf of Peebles Group Limited:



pp. R Peebles
12 May 2023

Address for service of submitter:

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

No.	Provision	Position	Submission	Relief Sought
Planning maps				
1.	Planning maps	Oppose in part	For the reasons expressed in the submission above, the submitter considers the properties at 468-470 Cranford Street should be rezoned LCZ, accounting for the attributes of the land/locality and in order to meet the requirements of the NPS-UD.	<p>Amend the planning maps to rezone the properties at 468-470 Cranford Street as LCZ, as indicated below.</p> 

Submitter Details

First name: John

Last name: Lourie

Organisation: Entropy MMX Limited

Preferred method of contact Email

Attached Documents

Name
PC14 submission Winters Road Entropy

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:** Entropy MMX Limited (*Entropy*)

- 1 This is a submission on the proposed plan change 14 (*PC14*) to the Christchurch District Plan (the *District Plan*).
- 2 Entropy could not gain an advantage in trade competition through this submission.
- 3 Entropy's submission relates to the whole of PC14. However, the specific relief sought by Entropy is set out at **Appendix 1** and a summary of their key submission points follows.
- 4 In summary, Entropy has interests in the properties at 142A Winters Road, Christchurch. This site is residual land from the adjacent Northern Motorway Corridor project by NZTA/Waka Kotahi, with the designation for that infrastructure adjoining the land to the north, west and south.
- 5 Under PC14, this property is zoned Rural Urban Fringe (RuUF). It is surrounded by designated State Highway, with the exception of other RuUF land to the east.
- 6 This submission seeks that 142-144 Winters Road be rezoned for urban purposes, to provide for the more efficient and effective utilisation of the land resource, than would otherwise occur under RuUF zoning. Accounting for the zoning of land in the surrounding area, IG, MRZ, or RS zoning is sought on the basis that this would better enable the establishment of business or residential activities in a manner consistent with the NPS-UD including those provisions concerning sufficient development capacity, accessibility, and well functioning urban environments.



Figure 1 – subject land



Figure 2 – PC14 proposed zoning of subject land

- 7 Accounting for the above, Entropy consider that a IG, MRZ, or RS zoning is appropriate for the properties at 142-144 Winters Road, Christchurch and the planning maps should be amended accordingly.
- 8 The submitter seeks the following decision from the local authority:
- 8.1 The relief as set out in **Annexure A**.
- 8.2 Any other similar relief that would address the relief sought by the submitter.
- 8.3 All necessary consequential amendments.
- 9 Entropy wishes to be heard in support of the submission.
- 10 If others make a similar submission, Entropy will consider presenting a joint case with them at a hearing.

Signed for and on behalf of Entropy MMX Limited:




pp. J Lourie
12 May 2023

Address for service of submitter:

Address for service of submitter:

Entropy MMX Limited
c/- Novo Group Limited (Attn: J Phillips)
PO Box 365
Christchurch 8013
Email address: jeremy@novogroup.co.nz

No.	Provision	Position	Submission	Relief Sought
Planning maps				
1.	Planning maps	Oppose in part	For the reasons expressed in the submission above, the submitter considers the properties at 142-144 Winters Road should be rezoned IG, MRZ, or RS, accounting for the attributes of the land/locality and in order to meet the requirements of the NPS-UD.	<p>Amend the planning maps to rezone the properties at 142-144 Winters Road as IG, MRZ, or RS, as indicated below.</p> 

Submitter Details

First name: Hamish

Last name: Wright

Organisation: Crichton Development Group Limited

Preferred method of contact

Attached Documents

Name
PC14 submission Crichton Dvlpt Group Ltd

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:** Crichton Development Group Limited (*Crichton*)

- 1 This is a submission on the proposed plan change 14 (*PC14*) to the Christchurch District Plan (the *District Plan*).
- 2 Crichton could not gain an advantage in trade competition through this submission.
- 3 Crichton's submission relates to the whole of PC14. However, the specific relief sought by Crichton is set out at **Appendix 1** and a summary of their key submission points follows.
- 4 In summary, Crichton has interests in the properties at 15-19 John Paterson Drive, in Halswell. These properties and those extending along the northern side of John Paterson Drive (inclusive of 5-19 John Paterson Drive and 451 Halswell Junction Road) form an enclave of land that includes and directly adjoins the Christchurch Southern Motorway and is bounded to the northwest and southeast by urban land. John Paterson Drive is a formed urban-standard road and the properties serviced by this road are not presently used for productive rural purposes.



- 5 Given this context, the evident demand and inadequate supply for greenfield residential land in Christchurch city and the absence of any evident significant rural values in this location (notwithstanding versatile soils), Crichton consider that the land is most appropriately rezoned to a Medium Density Residential Zone (MRZ). Such zoning would be consistent and compatible with adjacent zoning to the southeast and would provide additional and necessary household capacity in accordance with the requirements of the NPS-UD.
- 6 Crichton's submission primarily concerns the land to the north of John Paterson Drive, but it is acknowledged that rezoning of land to the south and south as MRZ may also be necessary and appropriate for the same reasons expressed above.
- 7 Accounting for the above, Crichton consider that a Medium Density Residential zoning is appropriate for the properties at 5-19 John Paterson Drive and 451 Halswell Junction Road and the planning maps should be amended accordingly.
- 8 The submitter seeks the following decision from the local authority:
 - 8.1 The relief as set out in **Annexure A**.
 - 8.2 Any other similar relief that would address the relief sought by the submitter.
 - 8.3 All necessary consequential amendments.
- 9 Crichton wishes to be heard in support of the submission.
- 10 If others make a similar submission, Crichton will consider presenting a joint case with them at a hearing.


Signed for and on behalf of Crichton Development Group Limited by



pp. H Wright
12 May 2023

Address for service of submitter:

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

No.	Provision	Position	Submission	Relief Sought
Planning maps				
1.	Planning maps	Oppose in part	For the reasons expressed in the submission above, the submitter considers the properties at 5-19 John Paterson Drive and 451 Halswell Junction Road should be rezoned MRZ, accounting for the attributes of the land/locality and in order to meet the requirements of the NPS-UD.	<p>Amend the planning maps to rezone the properties at 5-19 John Paterson Drive and 451 Halswell Junction Road as MRZ, as indicated below.</p> 

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Robert Leonard

Last name: Broughton

Preferred method of contact Email

Attached Documents

Name
Letter-from-Mayor-Lianne-Dalziel-to-Hon-David-Parker-Minister-for-the-Environment-re-Proposed-Plan-Change-14-Housing-and-Business-Choice-2022-09-20(1)
GrePartridgearticle1March23
Bespoke Plan Proposal 20220921
What are the negative impacts of high rise
SOCIAL-PROBLEMS-IN-HIGH-RISE-LIVING-IN-JOHOR-BAHRU
challenges to mental health in high rise -10-00034-v2
Riccarton Bush Precinct Streetscapes
Riccarton Bush Precinct Homes
RBI_Kauri_ClusterTrees_Streetscape_Green_views
RBI_Kauri_Cluster_Streetscapes
Time running out to save ChristchurchTrees_TinaLaw
Success story_singapore
_a greener graden city_Will Harvie
Urban Tree Cover
Urban greening can reduce impact of global heating in cities
Historic earthquakes
Greeninfrastructure
Global Warming Has Concrete Problem When It Comes to CO2
EarthquakeHistoryurls
AlivinghellTelevisionApril 162021
Re Affordability
Christchurch most affordable story
2018 to 2022 Multi-Unit Developments in Christchurch EXECUTIVE SUMMARY
Moonee Valley Neighbourhood Character Study 2012 I - Chap3_AppendixAold
Moonee Valley Neighbourhood Character Study 2012 I - Chap3_AppendixA
230508_5381_PC14 Riccarton Bush - Kilmarnock_Landscape memorandum
RLB FOR THE CHRISTCHURCH DISTRICT PLAN INDEPENDENT HEARINGS PANEL
PCL4coversheetRLBroughton
MY_proposed_PC14changes_RLBroughton

20 September 2022

Hon David Parker
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Wellington, 6160

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Tēnā koe Minister

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

As you are aware, our Council declined to notify the proposed plan change to give effect to the NPS-UD and the new provisions of the RMA to enable housing supply for Tier 1 councils.

You may not be aware that the Council authorised staff to undertake pre-notification engagement, which resulted in extensive feedback being received from a wide range of community groups. There was support for intensification to address both housing supply and affordability issues, however there were serious concerns raised about the impact of the one-size-fits-all intensification approach.

As a Council, we have asked Ministers and officials to take our unique circumstances into account from the outset of the NPS-UD process. This legislation has never made sense for Ōtautahi Christchurch in the context of the extensive post-earthquake land-use changes that were made to the Christchurch District Plan. Unfortunately, these changes took effect after the initial report you relied on in your First Reading speech on the RMA Amendment Bill last year. I covered this, and many other critical issues, in my oral submission, which I have attached to this letter.

Our environment and our planning arrangements are quite different to both Auckland and Wellington. With our neighbours to the north and south, we stretch into the Canterbury Plains. We are much flatter than our counterparts in the north, and we don't have the valleys and gullies which naturally inhibit development elsewhere. This means the impact of the housing intensification provisions is significantly greater when it comes to tree canopy and liveability.

Through our existing planning arrangements, which include the Greater Christchurch Partnership and now the Whakawhanake Kāinga Committee (Urban Growth Partnership with central government), we are already seeking to address housing affordability and availability – without exacerbating urban sprawl – by (under our current District Plan) enabling intensification in areas where it makes sense i.e. focussing on centres and key public transport routes.

I am aware that the Council is now technically in breach of our statutory obligations and that there are powers available to Ministers to intervene. I am asking Ministers not to do so.

Instead, I am calling on you to work alongside the Council to find a bespoke solution for Ōtautahi Christchurch that meets the Government's objectives whilst promoting a sustainable urban form that protects our tree canopy and enhances the liveability of our city. It is what our residents want, and it is in the best interests of the city that we do. In fact, it will enable the development of a well-functioning urban environment, as anticipated by the NPS-UD.

Given that voting for local body elections closes on 8 October, I hope that you agree it would be most appropriate to allow the new Council time to investigate a solution once governance arrangements are in place.

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

I have attached more detailed information which supports the position set out in this letter. I have also attached a letter from Professor Peter Skelton, former Judge of the Environment Court and former Canterbury Regional Council Commissioner, who has very kindly written to me in support of the Council position on this matter.

I would greatly appreciate a response from you on the approach we are recommending before Thursday 29 September, so that I can report this to my colleagues before the Council breaks up for the election period.

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

Ngā mihi



Lianne Dalziel
Mayor of Christchurch

cc Hon Nanaia Mahuta
Hon Dr Megan Woods
Hon Phil Twyford

Attachment 1: Detailed request from Christchurch City Council to Ministers

Introduction

1. On Tuesday, 13 September 2022, the Christchurch City Council chose not to approve a staff recommendation to notify Plan Change 14 (PC14), which was intended to give effect to the National Policy Statement on Urban Development 2020 (NPS-UD) and the 2021 amendments to the Resource Management Act 1991 (RMA).
2. The Council resolved (in part) to:

“Request the Minister work with us in partnership given our unique situation that means we have sufficient capacity of land in the short, medium, and long term available for housing given our extensive land use planning changes to increase density and intensification post-earthquake, and look at land use planning that addresses the issues of housing affordability and sustainable development.”

As a Council, our key concern is that the legislation and process do not take into account the unique situation in Ōtautahi Christchurch

3. Our Council has stated repeatedly in engagement, submissions, and presentations to select committees and communication with ministers that the Council has strong concerns with the legislation and process undertaken to get to this point. While the Council recognises the need for intensification in appropriate areas to ensure housing affordability and sustainable development, the one-size-fits-all approach in the legislation fails take into account the relevant local context and what is appropriate to achieve a well-functioning urban environment.
4. One of the key drivers of the legislation is to ensure that land supply for housing is sufficient both in the short term and the longer term; however, unlike other Tier 1 centres, Ōtautahi is in the unique situation of having sufficient land capacity for housing in the short, medium, and long term. This is detailed in the evaluation assessment for the proposed plan change 14. This is due to both extensive long-term partnership over many years by the Greater Christchurch Partnership, and the result of the recovery plans, regeneration plans and bespoke Independent Hearings Panel process for the Christchurch District Plan. These endeavours have provided for extensive land use planning changes in the post-earthquake environment, which has enabled Ōtautahi to provide for housing supply and intensification more thoroughly than other centres already – in this respect, we are ahead of the game.
5. We have repeatedly expressed our concern that the statutory obligation to implement medium density residential standards (MDRS) has the effect of reducing the potential uptake of development opportunities in areas of the city that are highly accessible by walking, cycling and public transport to employment, services and amenities. The vast scope of MDRS results in an urban form that is expansive in all directions - that is not appropriate for Ōtautahi. Our level of accessibility ranks poorly compared to other centres because growth here is unconstrained by bays, gullies, and other landforms that direct and limit growth opportunities for other larger Tier 1 councils.
6. Enabling medium density through the MDRS in these poorly accessible areas of Ōtautahi fails to align with areas of employment, local services, public transport corridors, and fails to deliver a low-carbon future. Whilst parking spaces cannot be mandated through the District Plan, the market (and indeed lenders) will be forced to provide parking due to the lack of alternative transport options and the dislocation from employment and services.
7. We want to make it clear that, other than the introduction of MDRS, we are generally supportive of the direction of the NPS-UD. As previously indicated, we support changes that seek to intensify within and around centres. In order to meet all of our objectives, intensification must be enabled in a more focussed way in

Ōtautahi. This would best contribute to increased efficiencies in land use and infrastructure for the city; support the viability of multi-modal transport systems, and contribute to a reduction in greenhouse gas emissions and the broader affordability goals desired in Ōtautahi.

8. Our Council truly believes that bespoke provision for Ōtautahi's implementation of the NPS-UD would better provide us with the opportunity to provide for a low-carbon, accessible form of residential living. In order to help us achieve other government priorities, we hope that you agree.

Request to work in partnership to achieve an appropriate outcome for Ōtautahi Christchurch

9. Despite the concerns expressed with the legislation and process, the Council agrees with the Government's objective of improved intensification, particularly to ensure housing affordability and sustainable development. Liveability is an important part of that.
10. The Council would progress in partnership with Government to find a solution to land use planning that addresses the issues of housing affordability and sustainable development, specifically tailored to the our context. We seek an approach that enables the specific issues relating to land use planning in Ōtautahi to be addressed, as opposed to the one-size-fits-all approach.
11. We consider it is in the best interests of the Council and the Government to achieve an urban form outcome for Ōtautahi that appropriately reflects our unique situation and that has regard to the extensive land use planning changes to enable increased density in a post-earthquake environment.
12. As you know, the Council is working in partnership with other local councils, central government and mana whenua through the Urban Growth Partnership for Greater Christchurch – the Whakawhanake Kāinga Committee – to develop a spatial plan which sets the direction for the future urban form for our city and surrounding towns. Integral to this work is the consideration of enhanced public transport provision, particularly investigation of mass rapid transit.
13. At the Whakawhanake Kāinga Committee briefing 12 August 2022, members were supportive of urban form direction to inform the development of the draft spatial plan. This included focusing growth on 'higher densities around centres and major transport routes / MRT across all Greater Christchurch centres'. This urban form direction is consistent with our view of the type of intensification which will best deliver a well-functioning urban form for Greater Christchurch that can reduce private car dependency, provide affordable, quality housing and support economic prosperity.

21 September, 2022

Lianne Dalziel
Mayor of Christchurch

Cc Dawn Baxendale, CEO, Christchurch City Council
Christchurch City Councillors

Dear Madam Mayor,

YOUR APPEAL TO THE CROWN ASKING FOR A BESPOKE HOUSING PLAN FOR ŌTAUTAHĪ

As you know a number of residents groups have been active recently (since the Sept 13th NO vote) encouraging the government to delay making any hasty decisions while we provide evidence of the level of intensification we need to meet the agreed objectives.

The 21 groups named below ask you to please represent our thinking when considering what the bespoke plan might look like. We note you have already written to the Minister asking if we can be a special case.

Informing our request is the knowledge that the proposed unplanned level of intensification enabled in PC14 is unnecessary and potentially damaging. Even with recently announced (and long overdue) government policy to protect rural land, you know we still have more than enough housing development capacity in Christchurch for the foreseeable future.

We ask for the following:

- 1) The rules related to setbacks and recession planes (governing shading) should be immediately returned to CCC control, in recognition of the fact that 'one size fits all' across the motu is inequitable, and our current operative plan rules are acceptable.
- 2) The extent to which medium density should apply should be limited to areas identified for medium density growth in our operative District Plan, rather than city-wide.
- 3) The extent to which higher density residential standards should apply outside the CBD should be determined after CCC has
 - a) re-evaluated the extent to which they are required to meet housing demand and environmental policy objectives.
 - b) consulted further with affected communities and has taken the views of those communities into account.
 - c) re-evaluated and tested assumptions, such as
 - i) the boundaries for city, town and neighbourhood centre areas.
 - ii) for each centre walking precinct, the actual ideal average-speed walking times (not distances) from key locations in the centres, such as supermarkets and transport hubs.
 - d) identified necessary infrastructure and services needed to support higher densities.
 - e) put in place policies, rules or incentives to ensure the core CBD is intensified first, particularly those areas where there is vacant or poorly-utilised land.

- 4) Compulsory minimum building quality and design standards are needed. Kainga Ora standards might be a starting point.
- 5) All standards should include an acknowledgement of the importance of amenity, social and community cohesion, and wellbeing; consistent with Sections 5 and 7 of the RMA. The NPS-UD appears to conflict with the Act in this respect.
- 6) All Qualifying Matters as proposed, and subsequently amended, must remain in place.

These requests might best be met by redesignating our city a Tier 2 City. In years to come, if circumstances dictate, we can always be made Tier 1. It simply doesn't work the other way around.

Thank you

1. Addington Neighbourhood Association
2. Burwood East Residents Association
3. Central Riccarton Residents' Association
4. Charleston Neighbourhood Association
5. Christchurch Civic Trust
6. Dallington Residents' Association
7. Englefield Residents' Association
8. Halswell Residents' Association
9. Hospitality NZ Canterbury
10. Greater Hornby Residents' Association
11. Ilam and Upper Riccarton Residents' Association
12. Inner City West Neighbourhood Association (ICON)
13. Lower Cashmere Residents' Association
14. Northwood Residents' Association
15. Riccarton Bush-Kilmarnock Residents' Association
16. Riccarton Bush Trust
17. St Albans Residents' Association
18. Somerfield Residents' Association
19. Spreydon Neighbourhood Network
20. Victoria Neighbourhood Association
21. Westmorland Residents' Association



SOCIAL PROBLEMS IN HIGH-RISE LIVING IN JOHOR BAHRU

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History:

Received: 29 July 2018

Received in revised form: 2 October 2018

Accepted: 31 October 2018

Available Online: 13 November 2018

Keywords:

High-rise living, social problems, urban area, Johor Bahru

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ABSTRACT

Housing is the basic needs for human being. Living in high-rise properties has increasingly become an accepted reality of the today's society particularly in urban country such as Hong Kong, Singapore and Malaysia. However, high-rise living causes the numbers of social problems such as suicide, social isolation, increasing in crimes, feeling of anxiety and depression and so forth. Hence, this study aims to ascertain the social problems in high-rise living and determine the factors that contribute to the social problems in high-rise living. A Likert-scale questionnaire survey is used to achieve both objectives. The data is analysed by using frequency analysis and mean scores. The findings of the results show that the main social problems in high-rise living is social isolation while the main factors contribute to the social problems is Airbnb factor and lack of communication with neighbours. This study suggested that similar research should be undertaken for different type of accommodation as social problems occur not only for high-rise living residents only.

1.0 INTRODUCTION

For thousands of years, people built their houses on ground with only one to two floors height. They never built an underground or high-rise dwelling as both structures will contribute dread feeling and unpleasant living condition for them.

However, more and more high-rise residential buildings are being erected in all continents in the world. This is due to the world today is facing escalating rates of urbanisation and is expected to increase significantly in near future, especially in Asia, Africa and Latin America. Although there is a negative growth rate in some cities of the Europe, the overall population still increase gradually. Same situation persists in the Australia and Canada (Al-Kodmany, 2011). Thus, the overpopulation threat is impending over the entire world.

As stated in the World Urbanization Prospects 2014, the urban population is expected to be 66% in 2050, which was 30% in 1950s. It is promising to say that 2.5 billion people will be added to the urban population by 2050 by looking at the increment percentage in the urban population. Because of the population growths, high-rise residential buildings are resorted to cater for the increased dwelling demand. In highly developed countries like UK, Japan and Singapore, high-rise living can be considered as the most common living style for most of the people due to the high population and scarcity of developable land in urban areas.

There are several studies stated that the key reasons for emergence of the high-rise residential in a large number is due to the in-migration of the people to the urban areas, increased land value, scarcity of land in urban areas and massive

housing shortage (Mir *et al.*, 2012; Arslan and Sev, 2014; Eichner and Ivanova, 2018).

2.0 PROBLEM STATEMENT

As in many other Asian countries, Malaysia also facing a rapid urban growth in recent years. The rate of urbanisation in Malaysia increased from 25% in 1960 to 75% in 2017 and is expected to surpass 80% by 2020. The construction of high-rise development in Malaysia is obvious, especially due to scarcity of land in the urban state such as in Kuala Lumpur, Penang, Selangor and Johor.

However, high-rise living has causing many unpleasant outcomes such as suicide. Jumping from high-rise buildings becoming very common method of suicide (Johari *et al.*, 2017; Lester, 1994).

Several studies and reviews concluded that high-rises are not favourable for residents. This is due to social problems arise from the high-rise living which are fear, suicide, dissatisfaction, behaviour problems, stress, poor social relations, delayed child development and reduced helpfulness (Angrist, 1974; Cappon, 1972; Conway and Adams, 1977).

Hence, the research questions for this study are:

- a) What are the social problems in high-rise living?
- b) What are the factors that contribute to the social problems in high-rise living?

The objectives of the research are set as below:

- a) To ascertain the social problems in high-rise living,
- b) To determine the factors that contribute to the social problems in high-rise living.

3.0 LITERATURE REVIEW

High-rise building will always be associated with social problems. This section will be looking at the overview of high-rise building and the social problems that has been associated with this kind of living.

3.1 High-Rise Building

A very basic definition of high-rise building is a tall modern building with many floors. The differentiate of high-rise buildings from conventional low-rise is high-rise buildings need special engineering systems due to their heights (Scott, 1998). However, there is no specific height stated in the several studies.

There are different approaches to determining the number of floors of high-rise buildings in different countries. As stated in Russian building codes, it can be categorised as high-rise buildings if the buildings are rising from 75 meters to 120-150 meters, with the number of floors not exceeding 30. High-rise buildings also can be identified as buildings having six (6) stories or more (Ministry of Housing and Urban Development). Urban planners often identify buildings with ten or more stories as tall buildings. Some researcher stated that the minimum stories of a high-rise building must be at least eight (8) storey high, although this number can be increased to 12, given the advance in facilities Shakeri *et al.* (2010).

From urban studies perspective, the main problem regarding the definition of high-rise buildings is that this definition is not adequately flexible. This is because there is relative concept for "tall buildings", not only to its heights, but other things should be considered as well. Hence, definition of tall buildings with respect to urban problems can be combined of both qualitative and quantitative variables. For instance, the meaning of tall buildings in some parts of the UK are based on the height, their effect on the surrounding environment or major impact on the skyline. If a building has one of these conditions, it considered as a high-rise building. Thus, a building with a middle height can be considered as a high-rise building on condition that it has impact to the skyline or the surrounding environment (Karimi and Adibi, 2010).

On the other hand, Davis and Everest *et al.* (2002) states that it is not possible to give the definition of tall buildings by using absolute measures. It is believed that "tall buildings are best understood in relative terms as buildings whose planning, design, construction and occupation is influenced by height in ways that

are not normally associated with more typical, local developments.”

3.2 Social Problem

Although a huge amount of papers was written regarding social problem, yet there is no universal definition about social problem. However, the common definition of social problem is any condition or behaviour that has negative consequences for large numbers of people and that is generally recognized as a condition or behaviour that needs to be addressed (Peck and Dolch, 2001).

Mental health, insecurity, health problems, children development are among social problems being brought up in previous studies by various researchers (Williams & Braun, 2019; Fujiwara *et al.*, 2014; Gifford, 2007; Hummelsheim *et al.*, 2011).

Apart from that, studies also reveal that loneliness and social isolation becoming big issue for social problem (William and Braun, 2019). Hummelsheim *et al.* (2011) also discusses insecurity and living in fear as main issues in their research.

4.0 METHODOLOGY

This research was based on study area that has been identified. This section will discuss study area, surveys, data sampling, collection and lastly data analysis.

4.1 Study Area

This study has been focused in Johor Bahru area. Johor Bahru is the state capital of Johor, which are the most southern state in Peninsular Malaysia. It has grown to become the second most important economic conurbation in Malaysia overall. This area also is one of the urbanise cities with the most population in Johor due to the in-bound migration. The existing supply of high-rise buildings unit including condominiums and apartments is 51,921 units and 10,807 units are incoming supply which indicates a high number of units after Selangor and Kuala Lumpur (NAPIC, 2018).

4.2 The questionnaire surveys

Basically, there are two types of questions structure used in forming questionnaire survey to collect data which are closed-ended questions and open questions. For closed-ended questions structure, respondents only allowed to response based on pre-decided categories. Data that can be placed into a category is called nominal data can be restricted to as few as two options such as ‘yes’ or provide ordinal data (which can be ranked) to measure the strength of attitudes or emotions such as 1 represent strongly disagree and 5 represent strongly agree.

For this research, there are three sections in the questionnaire survey which was designed to meet the objectives of the study respectively. Section A is demographic information about respondents such as gender, age, stakeholder, education level, marital status, income and so on. Questions in Section B will cover the social problems in high-rise living whereas Section C will cover on the factors that contribute to the social problem in high-rise living. The questions used in this questionnaire survey are closed-ended questions. Five-point Likert scale also adopted in this questionnaire survey.

4.3 Data Sampling

For the purpose of this research, the snowball sampling method was chosen to be the main way of collecting and selecting respondents. This method is a non-random sampling method used when the desired sample characteristic is rare. First respondent will be taken from the relatives or friends who are fulfil the requirement such as a resident in the medium to high-end high-rise residential or the management body in the high-rise residential buildings and then ask him to recommend to other respondents who will fit the description of the sample needed. As this referral technique goes on, the sample size will be increased.

4.4 Data Analysis

Frequency analysis is a simple data analysis method which is used to determine the frequency or number of respondents for each replied question. It is also a technique that is used to

determine the frequency of certain answer chosen by respondents. For this research, most of the questions formed in this questionnaire survey in Section A are analysed by using this method.

Likert scale is a psychometric scale where questions based on this scale are normally used in a survey. It is one of the most widely used question types in a survey. It is used to measure a respondent's opinion or attitude towards a given subject. The Likert scale is a 5- or 7-point scale that offers a range of answer options, from one attitude to another, like "agree" to "disagree".

In this research, a Likert scale of 1 to 5 used in the questionnaire survey is in Section B and Section C to determine whether the respondents completely disagree, disagree, partially agree, agree or completely agree with the statement provided. The findings from the questionnaire are then analysed by using SPSS and Microsoft Excel.

5.0 RESULTS AND ANALYSIS

This section is about results and research analysis. The discussion will be based on respondents for this study. The analysis then will be discusses based on the research objectives for this study.

5.1 Profile of Respondents

Table 1 shows the demographic of the respondents. Out of the total 168 filtered respondents for this study. It can generally conclude that 85.7% of the respondents is residents, 54.2% out of the 144 residents is tenant, more than half of the respondents is male, 47% of them is Chinese, 39.3% of the respondents is in the age range between 26 to 39 years old.

Almost half of the respondents have the degree level (47.6%), more than half of them is married (54.2%) and have no child (50%), 32.7% of the respondents' income is RM3,000 and below and most of the them live in condominium (45.8%).

Table 1: Respondents Profile

Demographic Attributes	Characteristics	Frequency	Percentage (%)
Stakeholder	i. Management office	24	14.3
	ii. Resident	144	85.7
Gender	i. Male	86	51.2
	ii. Female	82	48.8
Race	i. Malay	37	22.0
	ii. Chinese	79	47.0
	iii. Indian	22	13.1
	iv. Others	30	17.9
Age	i. Below 25 years old	37	22.0
	ii. 26-39 years old	66	39.3
	iii. 40-59 years old	56	33.3
	iv. 60 years old and above	9	5.4
Types of ownership	i. Owner	66	45.8
	ii. Tenant	78	54.2
Education level	i. SPM and below	18	10.7
	ii. Diploma	30	17.9
	iii. Degree	80	47.6
	iv. Master	28	16.7
	v. PHD	12	7.1
Marital status	i. Single	91	54.2
	ii. Married	77	45.8
Number of children	i. 0	84	50.0
	ii. 1	29	17.3
	iii. 2	28	16.7
	iv. 3	18	10.7
	v. 4 and above	9	5.3
Income	i. RM3,000 and below	55	32.7
	ii. RM3,001-RM5,000	37	22.0
	iii. RM5,001-RM7,000	33	19.6
	iv. RM7,001-RM9,000	11	6.5
	v. RM9,001-RM11,000	20	11.9
	vi. RM11,001 and above	12	7.1
Types of high-rise buildings	i. Apartment	32	19.0
	ii. Condominium	77	45.8
	iii. Others	59	35.1

5.2 Analysis for First Objective

Table 2 shows the results of the Likert scale analysis that has been carried out on the first objective which is social problems in high-rise living.

From the analysis, the main social problems in high-rise living is social isolation as it obtains the highest mean score value which is 4.17. This is because most of the high-rise residents are lack of communication with their neighbours, accordingly towards the outsiders.

It is then followed by the feeling of insecurity as the mean score value obtained is 4.02, Most of the respondents feel insecurity living in high-rise is most probably because of there are huge number of people reside in the same residence, which means they need to share the dwellings especially the common facilities with the strangers.

Table 2: Mean Scores for Social Problems in High-Rise Living

Category	Social Problems in High-Rise Living	Mean Score
Completely Agree	Social Isolation	4.17
	Feeling of Insecurity	4.02
Agree	Living in Fear	3.75
	Health Problem	3.57
Partially Agree	Noise Problem	3.46
	Development of Children	3.30
Disagree	Behaviour Problem	3.07
	Mental Problem	2.98
Completely Disagree	Distance to Religious Centre	2.42

Respondents agree that living in fear as a social problem in high-rise living most probably because of high-rise living evokes unsettling fear such as residents could be trapped in a fire or fall or jump from the buildings. Besides, loop of dust and poor air flow in the high-rise residential affect the respiratory system of the residents (Arslan and Sev, 2014). It is then indicating the reason respondents agree health problem as one of the social problems in high-rise living.

The problems of noise and development of children are partially agreed by the respondents as the social problems in high-rise living. The noise can be come from the day-to-day living such as talking, carrying out household activities, walking and when there is a party while development of children such as dressing was slower if compared to the children in low-rise or landed residential.

On the other hand, social problems of behaviour problem and mental problem are in the category of disagree. The mean score obtained by the behaviour problem and mental problem is 3.07 and 2.98 respectively. Most of the respondents do not agree with the both social problems in high-rise living most probably because of they do not found much mental difficulties and significant behaviour problems among the residents.

For the problems of distance to religious centre, it is completely disagreed by the disagreed by the respondents as a social problem in the high-rise living as it has the lowest mean score value which is 2.42. This is most probably because of majority of respondents are willing to go to the religious centre no matter how far the

distance between the religious centre and dwelling places.

5.3 Analysis for Second Objective

Table 3 shows the results of the Likert scale analysis that has been carried out on the second objective which is factors that contribute to social problems in high-rise living.

Table 3: Factors Contribute to Social Problems in High-Rise Living

Category	Factors that Contribute to Social Problems in High-Rise Living	Mean Score
Completely Agree	Airbnb	4.23
	Lack of Communication with Neighbours	4.23
	Management Problem	4.07
Agree	Building Design	3.57
	Parental Problem	3.46
Partially Agree	Building Material	3.43
	Lack of Facilities Provided	3.20
Disagree	Acrophobia	2.52

From the analysis, it is found that factors of Air Bed & Breakfast (Airbnb) and lack of communication with neighbours are the main factors contributed to the social problems in high-rise living as both factors have the highest mean score which is 4.23. Most of the owners or investors in their dwellings use Airbnb to market their dwellings for short-term tourism by renting out their room or whole places (Oskam and Boswijk, 2016). Due to the feeling of insecurity or fear to communicate with the strangers as their neighbours that always been different. Most of the residents have fewer interactions with their neighbours and they tend to live in isolation. As a result, this had contributed to the social problem of social isolation.

It is then followed by the factor of management problem with the mean score value of 4.07. Most of them are not professional, lack of knowledge and experience in managing the residential building and the most importantly is too profit oriented (Tiun, 2009).

Building design factor is also one of the factors which agreed by most of the respondents as the factors that contribute to the social problems in high-rise living. The increasing height of the building cause large wind shadows and minimize the air flow which could affect the lightning in the high-rise, accordingly, impact the health of the residents (Arslan and Sev, 2014).

Moreover, factor of parental problem and building material are partially agreed by the respondents with the mean score value of 3.46 and 3.43 respectively. Parents need to have their children in their visual vicinity. Hence, children in high-rise buildings are more restricted access to open spaces (Gifford, 2007). Building material of the high-rise building also be a factor as the issues of water and airtightness of the material used are always neglected. This will cause cracks on the wall and help the growth of mould and fungus which could affect the health of the residents (Baxi *et al.*, 2016).

The factor of lack of facilities provided is fallen in the category of disagree with the mean score value of 3.20. Most of the respondents did not agree with this factor most probably because of the facilities provided in their high-rise buildings is enough for them.

The last factor that contributed to the social problems in high-rise living is acrophobia factor. This factor is completely not agreed by the respondents with the mean value of 2.52. This is because majority of the respondents do not suffer from acrophobia.

6.0 CONCLUSION

Overall, based on the findings in this study, the main social problems in high-rise living is social isolation and followed by the feeling of insecurity while the main factors contributed to social problems in high-rise living is Airbnb and lack of communication with neighbours and then followed by management problem. As more and more of the high-rise residential has been market using Airbnb for short-term stay, the increasing number of strangers has increasing the feeling of insecurity and fear of residents to communicate with the neighbours as their neighbours always been changed. This had led to the main social problem which is social isolation among the residents as they tend to live in isolation.

Social problems in high-rise living can become serious if the appropriate measures do not been taken up. This issue could cause many unpleasant outcomes for the residents and consequently affect the image and development of the country if the issue remains unchanged. Hence, the issue of social problem in high-rise living should be concerned by the relevant

authorities and the ways to overcome this issue should be done in the future study to change the scenario in the future. It is suggested that similar study should be carried out for different living style as social problems not only occur for high-rise living resident only.

ACKNOWLEDGEMENTS

First and foremost, we would like to express our sincere gratitude to Real Estate Department, Universiti Teknologi Malaysia for their continuous guidance and support on the completion of this research. Their guidance had helped me in all aspects of this research. We would also like to acknowledge the anonymous professionals and residents who were the respondents in this study. They had been of great assistance and have given us enough information for this research to progress.

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Review

High-Rise Apartments and Urban Mental Health—Historical and Contemporary Views

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Received: 20 June 2019; Accepted: 16 July 2019; Published: 31 July 2019



Abstract: High-rise apartment buildings have long been associated with the poor mental health of their residents. The aims of this paper are to examine whether this connection is necessarily so, by reviewing the evidence relating to the relationships between high-rise living and social wellbeing, occupant's stress levels, and the influence they have on mental health. From selected literature, psychological stress and poor mental health outcomes of the populations that live in high-rise apartments are indeed apparent, and this is particularly so for apartments in poor neighbourhoods. Yet many apartments in developed cities are in affluent areas (particularly those with views of green/blue space), where residences on higher floors are more expensive. Either way, high-rise living and mental health outcomes are a social justice issue. Our review allows us to propose two models relating to high-rise living relevant today, based on these differences.

Keywords: high-rise apartments; social justice; mental health; stress; wellbeing; socioeconomic status

1. Introduction

1.1. History

High-rise and vertical building is thought to have begun in the ancient civilizations of Egypt and the Americas with the construction of pyramids, temples and community structures. The architectural challenges of building multistorey residential buildings continued with the Roman Empire [1]. Large modern high-rise cities and suburbs began to emerge in the last century, particularly across the United States, India, China, South East Asia and South America to house booming populations and massive urban migration, with some of these experiencing overcrowding, high-crime rates and the development of slums, which has helped stigmatise the experience of living in a high-rise apartment as a negative one [2]. This stigmatisation was made worse by the calculated use of high-rise complexes to segregate disadvantaged communities. In the period between 1940 and 1980 projects—such as Pruitt-Igoe in St. Louis, Clichy-sous-Bois in Paris, the Robert Moses-constructed projects in Harlem and the Bronx, and the Robert Taylor homes in Chicago—housed segregated disadvantaged communities in high-rise ‘boxes’ of poorly built, badly sited and under landscaped residential complexes [3], with most ultimately housing far in excess of their intended capacity. For example, America's largest public housing project, the now demolished Robert Taylor homes, was originally designed for 11,000 people,

but at one point housed over 27,000 people, of whom 95% were unemployed [4]. The escalating level of crime was such that in one weekend 300 separate shooting incidences were reported [5].

More recently, due to inner-city land shortages and compact city policies to reduce urban sprawl, a secondary high-rise boom is occurring in many developed countries, with a greater focus on more lucrative luxury apartment developments in inner cities and more established wealthier suburbs [6,7]. Perhaps to avoid the stigma still attached to housing commission flats, developers have fashionably adopted the term ‘apartment’ for these modern high-rise blocks [8]. However, while luxury buildings feature elaborate landscaping, spacious living areas and two or more bedrooms [9], there is a continuing socioeconomic divide with large numbers of ‘budget’ high-rises still found in disadvantaged areas and/or near transport hubs [10]. These are typically more cramped and crowded with lack of family privacy and significantly smaller in floor area than detached houses [11–13].

Today, people choosing to buy or rent high-rise apartments are attracted by a number of extrinsic and intrinsic qualities, although location and cost are usually the deciding factors [14]. Extrinsic factors include perceptions about neighbourhood and other residents [15], as well as proximity to public transport, education facilities and workplaces. For some, this also includes social facilities and nightlife [16]. Not having to maintain a house or garden may also be an extrinsic benefit. Desirable intrinsic qualities that may increase a resident’s quality of life include the design of the building, the layout, orientation and size of the apartment [15], views of the surrounding area and safety features such as a security person employed in a lobby.

The majority of high-rise apartment complexes are also less expensive for developers to build than detached homes, so apartments cost less to purchase, even once common land attached to the apartment building and maintained for an annual fee by an apartment owners corporation, is taken into account [7]. In general, this also translates to cheaper accommodation for rental tenants. For this reason, high-rise apartments are increasingly preferred by government agencies providing housing for socially disadvantaged people.

Although there are considerable regional variations, the majority of people living in apartments in developed countries are singles or couples [17,18]. In Australia, only 12.5% of high-rise apartment dwellers are two-parent families [19]. Apartment living is less appealing to families, because children’s activity levels are restricted [1,20], and parents are reluctant to let young children play unsupervised in common areas [18]. Apartment dwellers are typically younger people seeking proximity to central locations or older generations no longer wanting to maintain a house and garden or seeking a change in lifestyle [6,7].

The future shows a forward trend in the development of high-rise apartment buildings, and in the number of levels incorporated into each building [14,21], both to accommodate more people and to reduce the individual carbon footprint. The sustainability and quality of life in these buildings underscores the growing need for liveable high-density cities [22] to better manage urban sprawl, traffic congestion and infrastructure demands [16].

1.2. Living Conditions

High-rise apartments of four stories and above [20] have been typically constructed to solve housing and land shortages, and create affordable residential spaces. While this might provide cheaper housing, it can also produce adverse living conditions: apartments can be isolated, difficult to access, hard to ventilate, more elevated from the earth (the soil), and more quarantined from a diversity of microbes, plants and animals than traditional housing [1,23]. This burden of adversity is often greatest in socio-economic disadvantaged communities in high-density areas whose circumstances also restrict access to parks, sporting complexes, gardens or other natural spaces, with consequences for both physical and mental well-being, as well as opportunities to meet and socialise with others. Astell-Burt and Feng [24] found that residents of poor socioeconomic areas were much less likely to exercise—a known predictor of positive mental wellbeing. Many apartment buildings also discourage

or disallow pets, another factor increasing wellbeing. Dogs, for example, encourage physical and social activity (including visits to green spaces) and meeting other dog owners [25–27].

While socioeconomic disadvantage and environmental stress are associated with higher predisposition for mental health issues and drug and/or alcohol dependency, it is unclear whether the ‘high-rise environment’ is creating the living conditions that lead to mental ill health or whether these environments attract residents that already have mental issues. And if the latter, do these buildings make matters worse? The location, vista, floor level and size of the apartment determine the purchase price or rental yield, and therefore the social demographic that will live there. For example, apartments that were built with luxury in mind in a green interesting environment will attract an older demographic that is seeking a low maintenance property in comparison with an apartment built next to a freeway or railway station that has been built for a housing agency [10].

High-rise buildings can have direct and indirect effects on health. Polluted air quality, unsafe heating systems, the presence of toxic substances, pests, and overcrowding cause direct biological, chemical or physical effects and are easier to address than indirect effects such as individual characteristics and socio-economic circumstances [28]. This paper focuses on the indirect effects on health. We summarise the evidence for links between stress and social wellbeing in city settings, specifically the relationships between high-rise living and social wellbeing and occupant’s stress levels, and their influence on mental health. We then formally review the literature on high-rise living and mental health and explore how exacerbation of mental health issues of high-rise dwellers in poor socio-economic areas could be reversed with a number of strategies.

2. The Contribution of Stress and Social Well-Being to Mental Health Problems

2.1. Stress and Mental Health

Mental health is essentially a measure of resilience, and has been defined as “the ability to adapt personally and collectively to a given environment ... to mature and fulfil potentials ... living in homeostatic balance” despite the changing environment [20]. However, there is every indication that factors in the modern environment are eroding resilience and capacity to buffer stress. This is reflected in the staggering increase in mental health disorders, especially anxiety and depression, predicted by the World Health Organisation to become one of the major threats to human health by 2020 [29,30]. This also has implications for economic prosperity, as stress, depression and anxiety are the second major cause (13.7%) of work-related issues in Europe [31].

Stress, described in 1915 by Walter Cannon as ‘an acute threat to the homeostasis of an organism’, contributes to physical and psychological well-being [32,33]. While humans can readily adapt to acute stress, chronic stress can negatively affect brain structure and function [33]. This can affect long term resilience and predisposition to a range of psychiatric diseases, including schizophrenia, depression, and anxiety [34,35]. Susceptibility to stress is a reflection of complex individual, community, social, and environmental factors, of which neighbourhood factors are clearly important. Mental health disorders are more prevalent in urban areas, although the influence of urban structure is not well known [36].

Living in high-rise flats or apartments has been associated with higher rates of psychological distress [37]. This is multifactorial and may relate to concerns about housing, feeling trapped in deprived social environments [37], fears of falling from windows or balconies, being trapped by fire, earthquake, or terror attacks [1,38], and fears of acquiring a communicable disease through sharing elevator buttons, door handles and hallway air [1].

Of particular concern to public health are high-rise buildings that were constructed during the post-war boom of the 1950–1970s of which many are in poor condition, house disadvantaged communities and are located in low socioeconomic suburbs [28]. Architects in the 1970s raised concerns that “there is abundant evidence to show that high buildings make people crazy” [39]. Even today,

there is a prevailing reputation of high-rise housing as socially isolating living environments, drug and crime havens and generally unhealthy places [28,40].

2.2. Mental Health and High-Rise Living

2.2.1. Floor Level

First, we examined the role of floor level on mental health outcomes. One of the most comprehensive studies on this relationship was examined by Evans et al. [12] who conducted a critical review of the evidence on mental health and housing (including type, floor level and housing quality). They found that six out of eight studies reported residents of higher floor levels to have poorer mental health compared to residents of lower floors. Another study in Germany randomly allocated the wives of British and Canadian servicemen to floors in three to four level blocks of flats. The women on the fourth floor reported twice the levels of psychological distress as those living on the ground floor [41]. In a study of 964 adults living in high-rise flats in Scotland residents from the fifth floor upwards experienced twice the number of symptoms of poor mental health as those on lower floors and detached houses [42]. Similarly, a study found women on higher floors to have greater levels of emotional strain in a study of 442 public housing residents [43].

Evans et al. [12] surmised that more mental health problems are experienced by families living on upper floor levels. Panczak et al. [28] used data of 1.5 million people from the Swiss National Cohort in a more recent study that looked at whether floor level was linked to cardiovascular disease and found instead that people living on the eighth floor and above had a substantially increased chance of suicide by jumping. It may be argued that this was because of easy access to a place of great height but those people living above the eighth floor may have been socially isolated which contributed to their mental health issues. From the fifth floor and upwards residents become disconnected with what is going on in the world around them as they cannot see what is happening on the ground [22,28,44].

In regards to floor level, it is not known whether people with existing mental health conditions choose to live on higher floors, or whether this contributes to their condition via isolation factors; although Moore [45] found that neurotic personalities living in flats were more likely to experience psychiatric illness compared to stable personalities.

2.2.2. Street and Surroundings

Next, we examined whether poor socioeconomic 'streets' similarly contain socially disadvantaged residents as has been shown for high-rise buildings. According to McCarthy et al. [37] symptoms of mental disorders are less likely to be found in streets of similar householders than in high-rise flats located within 'inner-city problem' estates. Rates of psychological distress were compared for different dwelling types located in 'easy to let' and 'difficult to let' council areas and those who lived in 'difficult to let' high-rise housing were shown to be particularly vulnerable. One of the issues with unsatisfactory housing is that when residents get better opportunities and have the resources to move out, they leave the more disadvantaged residents, thereby creating social ghettos [37]. These people may not have a choice in their housing arrangements compared to residents of high-rise buildings in more affluent areas. From the above literature, it appears to be that the types of areas people inhabit are more closely associated with mental illness. For example, Ellaway [46] reported that residents' negative perceptions of their surroundings were associated with poor mental health. A study of four disadvantaged sites in Melbourne, Australia (two high-rise and two detached homes) found that high-rise dwellers had greater negative perceptions of the neighbourhood that led to poor health and well-being than did residents in detached homes, thus leading to the conclusion that a concentration of disadvantaged people in a high-rise building not only increases crime and insecurity for the surrounding area but decreases mental health for the residents [47].

2.3. Thematic Review

The literature was searched for articles assessing the relationship between high-rise housing and mental health and overall 25 relevant journal articles were found, including those already mentioned. Synthesis of key themes, study focus and health outcomes of the 25 journal articles are presented in Table 1. The method and full findings can be found in Appendix A. The majority of studies were conducted by surveys, either self-reported or by interview. The limitations of the searched literature were that not all studies could be retrieved in full detail, and it was not clear how many floor levels were in some of the earlier studies of flats.

Table 1. Summary of key themes, mental health study focus, high-rise health outcome (in comparison to low-rise/detached houses) for 25 found articles from 1967 onwards assessing the relationship between high-rise housing and mental health across a broad spectrum of mental health categories (<less, >greater).

Key Theme	Mental Health Study Focus	High-Rise Health Outcome	References
Social wellbeing	Social isolation/less social interaction	>social isolation	Fanning [41]
		<social support and involvement	Wilcox and Holahan [48]
		<social interaction	Zalot and Webber [49]
		<social networks	McCarthy and Saegert [50]
		<social support	Churchman and Ginsberg [51]
		<social contact	Levi, et al. [52]
		>poor social outcomes	Kearns, et al. [18]
		>social isolation	Chile, et al. [40]
Social wellbeing	Alienation	>feelings of alienation	Amick and Kviz [53]
Psychological health	Nervous disorders	>neurotic scores	Bagley [54]
		>depression	Moore [55]
		>depression	Richman [56]
		>emotional strain	Gillis [43]
		>psychological distress	McCarthy and Saegert [50]
		<depression after moving out	Littlewood and Tinker [13]
		>psychological distress	McCarthy, et al. [37]
		>psychological distress	Husaini, et al. [57]
		< stress coping skills	Dasgupta, et al. [58]
		>mental symptoms	Hannay [42]
Psychological health	Psychological problems i.e., depression	>worse psychosocial outcomes	Kearns, et al. [18]
		>suicide by jumping on higher floors	Panczak, et al. [28]
		<self-rated health	Verhaeghe, et al. [44]
		>neurotic personalities likely to experience psychiatric illness	Moore [45] Edwards, et al. [59]
		>perceived negative influence	Warr, et al. [47]
		>sense of efficacy after moving out	Rosenbaum, et al. [60]
Psychological health	Suicide		
Psychological health	Self-rated health		
Psychiatric health	Psychiatric problems		
Sense of place	Perceptions of neighbourhood factors that influence health		
Sense of control	Sense of efficacy (control)		

The studies in Table 1 clearly show an exacerbation of mental health problems in high-rise buildings in comparison to low-rise or detached houses. Psychological problems (58%) and social isolation (35%) featured prominently in the literature as areas of difficulty for apartment dwellers, and contributing to this are socio-economic factors and building design. Chile et al. [40] found consistent experience and expression of social isolation across all age groups. Although there are many factors that contribute to social isolation in high-rise apartment living, social isolation in itself is shown to be an important factor that contributes to mental health problems of high-rise dwellers [18,40].

It may be harder to form a community in high-rise apartments as it feels as if one is living with many strangers [18,50].

Many of the early study subjects of high-rise apartments were women, and Richman [56] found that complaints of depression were common. Gillis [43] found that higher floor levels predicted higher levels of emotion strain, and Littlewood and Tinker [13] found that women showed fewer symptoms of depression after moving out of high-rise apartments.

3. Proposed Causal Sequences

The factors examined in this review are stress, social wellbeing and mental health, and how or whether living in high-rise buildings might be related to them. There are clearly a number of confounding factors—such as the design of the buildings (although no studies have been found on the link between building design and mental health), the place in which they are situated and the type of person living in them—which may be modifying these relationships. Furthermore, the design of many studies does not include prior status of health, and greater than 80% are correlative only.

Drawing from the early research conducted in the 1970s and 1980s, (mostly studied on non-affluent areas), and the construction of modern high-rise apartments in western developed countries, a divide exists today between ‘rich and poor’, particularly in the area of public housing [61]. We use the flow diagrams below (Figures 1 and 2) to represent both sides of this divide and form the beginnings of a hypothesis on the causal pathways and compounding effects of high-rise apartment living that could be inferred by social justice and affluence [24].

Figures 1 and 2 explain the difference between where a high-rise apartment is situated (low socioeconomic or affluent area) as to what type of demographic might live in an apartment in that area. For example a high-rise in a low socioeconomic area may have environmental health concerns, limited green space, a higher likelihood of renters rather than owners, and occupant dissatisfaction with living space and neighbourhood. This is in contrast to a high-rise in an affluent area that may have interesting views, generous living space, social amenities and nearby green space. From the type of person living in the apartment in combination with the features and landscape of the apartment building, this may then determine whether a person develops a mental health disorder.

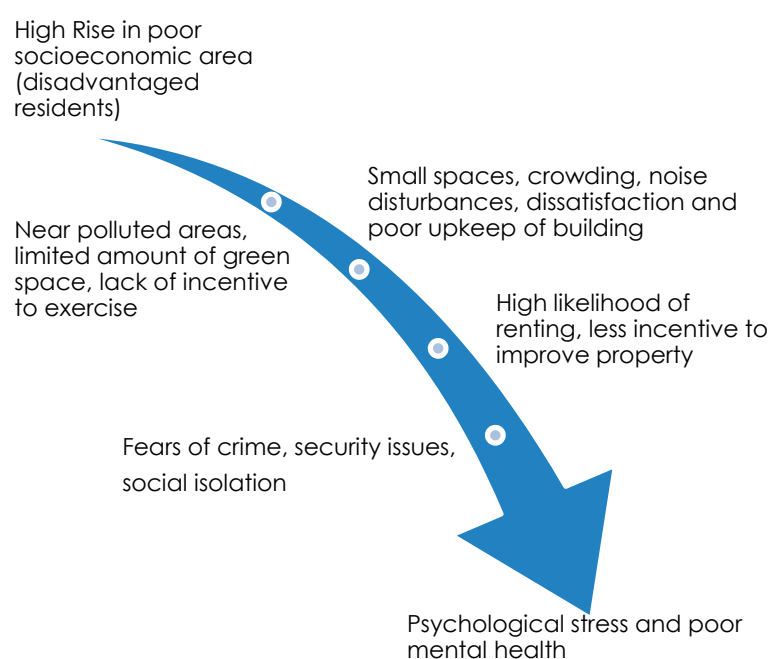


Figure 1. A possible causal sequence of high-rise apartments in poor socioeconomic areas where environmental health problems, dissatisfaction of living space, limited green space and a higher likelihood of renting may lead to social isolation, security fears and declining mental health status.

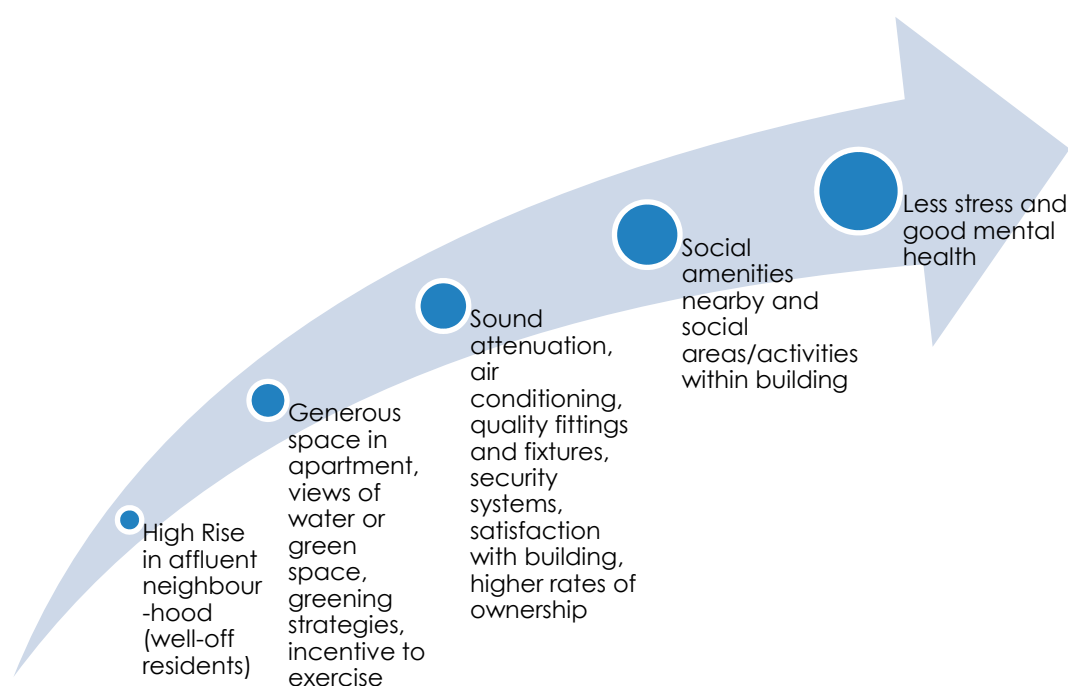


Figure 2. A possible causal sequence of high-rise apartments in affluent areas where good environmental health, satisfaction of living space, access to green space and social amenities that lead to higher ownership, may lead to less stress and good mental health.

4. Housing Interventions to Increase Wellbeing

4.1. Relocation

The demographic concepts described above has lead Gifford [1] to question whether moving people from high-rise apartments in a poor socio-economic area into luxury apartments would improve their mental health. To some degree, the high-rise residents could escape at least some negative effects on mental wellbeing, however if mental disorders/drug and alcohol problems are already established, the benefits may be more limited. In other words, the outcomes of living in a high-rise apartment are moderated to some extent by the ‘characteristics and qualities of the residents themselves’ [1]. However, two studies have found that residents of high-rise public housing who relocated to detached (stand-alone) homes as opposed to other high-rise buildings showed improved mental health [13,60]. Using 267,000 responses to the Kessler 10 Psychological Distress Scale, Astell-Burt and Feng [24] also found that people on low incomes living in affluent areas were less likely to experience psychological distress than those living in low socioeconomic areas. Collectively these findings suggest that extrinsic living factors remain an important determinant in mental well-being. The Gautreaux Program in Chicago in the United States saw over 3500 families randomly moved from high-rise deprived areas to either other high-rises or suburbs and followed up over a longitudinal study. It was found during telephone interviews of 100 mothers and children who moved to the suburbs, that they felt the high-rise buildings were like ‘a restrictive prison environment’, and once they moved they gained a new sense of efficacy due to freedom from fear [60]. The reverse is also possible, with depression emerging after being moved from an affluent neighbourhood to one of poor socioeconomic status.

4.2. Green Space

Another potential intervention relates to the amount of green space surrounding residential buildings. If greening strategies were employed around the high-rise buildings so that residents could be exposed to green space, studies have shown that they would report fewer symptoms of psychological distress [29]. An explanation for the better mental health of residents of high-rise buildings in more

affluent areas (with generally more environmental biodiversity) is the psychophysiological stress reduction theory. The theory proposes that contact with nature can shift highly stressed people to a more positive emotional state [62,63]. Van den Berg et al. [64] suggest that the general health of populations in lower socio-economic areas would benefit the most from having green spaces in their living environment.

No research to support the positive impact of access to green space interventions for high-rise dwellers could be found.

5. Further Research

Relocation, as discussed above, warrants a longitudinal study to determine if residents would still experience social isolation and psychological stress after the apparently positive social transition. For green space interventions, carefully controlled comparative studies would need to take into account the likelihood that wealthier high-rise dwellers may be more able to access help for mental health issues, and have access to private transport to visit green spaces and other community facilities. With cross-sectional designs, because of the ‘moment in time’ aspect of these type of studies there is the classical debate that residents who have poor mental health may choose to live in high-rise apartments and upper floors due to the causality of associations [11,12,44], however this debate may have unfounded claims. Gifford [1] ascertains that no causal conclusions between high-rise apartment living and mental health can be drawn because of the uncertainty over whether any study of high rise apartments meets standard criteria for scientific hypothesis testing, which is often because researchers have been forced to use research designs that are sub-optimal. The majority of studies used self-reported surveys that are still being used in valid research today. Verhaeghe et al. [44] state that most architectural studies claiming that ‘high buildings make people crazy’ are old and do not take into account socioeconomic position however most high-rise buildings of the post-war construction boom were built in more deprived areas and therefore comparative socioeconomic studies were not considered. Although observational or longitudinal design would be beneficial, the weight of replication of the cross-sectional studies with similar conclusions means that those results should still be taken into account, particularly when informing socioeconomic policy. Additional studies involving floor level and comparisons between high-rise apartment locations (while controlling for socioeconomic status) would be useful to investigate possible interventions and to add to the literature for a more definitive conclusion.

6. Conclusions

Inequitable approaches to urban design have a powerful influence in perpetuating social disadvantage and mental adversity. The socioeconomic status of intended residents remains a dominant undercurrent in divergent approaches to high-rise building design in high-density urban cities. With increasing urban migration, this will amplify health inequities, stress, crime and poverty, making cities increasingly “unhealthy” unless new approaches are mandated. Our investigation of the relationships between high-rise living and social and mental wellbeing revealed clear evidence that location plays a key role in the socioeconomic structure of the building. Poorly thought-out placement of high-rise buildings can have an adverse socioeconomic effect on city areas with a flow-on effect to the people living in those areas. In addition, a concentration of disadvantaged residents in one high-rise building increases the risk of adverse mental health outcomes.

We suggest a series of feasible strategies that may be considered—ideally with urban planners working closely with the communities they serve to co-create healthier environments. Preferably these strategies, wherever applied, should be evaluated for their impact on mental health outcomes. One strategy is to encourage a mixed tenancy of affluent and disadvantaged residents or a mix of privately owned and rented apartments with a view to maintaining this mixed quota. Another is using relocation of residents of high-rise buildings in poor socioeconomic areas to either detached homes or perhaps other high-rise buildings in more affluent areas. A strategy that encourages exposures to

environmental biodiversity (natural environment consisting of trees, plants, grass and species richness) may enhance urban design to benefit the mental health of high-rise dwellers in low socioeconomic areas. This is particularly important in cities with land and resource scarcity that inhibit designing new green spaces or new lower density suburban hubs. It would also help to bridge the gap between wealthy and low socioeconomic areas of a high-density city and can be achieved retrospectively by utilising greening strategies such as streetscaping, redesigning unused grey spaces, living walls, or communal rooftop gardens. For high-rise apartments without balconies, it is advised to develop communal green space around the apartment building and encourage indoor plants. Finally education for strata corporations is also suggested to allow residents to keep pets and grow plants themselves.

Overall, our review shows that social justice has a part to play in redefining equitable high-rise apartment living for better mental health outcomes.

Author Contributions: Conceptualization, D.L. and P.H.; writing—original draft preparation, D.L.; writing—review and editing, D.L., E.V., P.H., S.P.; visualization, D.L.; supervision, P.H., E.V., S.P., A.L.

Funding: This research received no external funding.

Acknowledgments: The corresponding author was the recipient of an Australian Postgraduate Award.

Conflicts of Interest: The authors declare no conflict of interest.

Appendix A. Investigation of Literature

Methods

The literature was searched using the Web of Science and Pubmed databases. A Google Scholar search was also conducted to help identify any ‘grey’ literature or papers not in major journals. Key literature was also hand searched for relevant supporting literature not previously identified. Papers were included if they were in English and peer-reviewed journal articles. A time limit was not set as there were a limited number of articles in recent years, and for this reason, reviews were included. Search terms used were ‘apartment’, ‘high-rise’, ‘condominium’, ‘high density’, ‘multi-family’, ‘urban’, ‘housing’, and ‘wellbeing’, ‘mental health’, ‘stress’ using a variety of combinations to target key references. Identification of areas for future exploration is discussed. Key papers for floor level and mental health were graded according to the criteria in Table A2.

Table A1. Key paper grading criteria of high-rise apartment studies.

A GRADE	B GRADE	C GRADE	D GRADE
contains a comparison between high-rise and low-rise	contains a comparison between high-rise and mid-rise	contains a comparison between high-rise floor levels	contains high-rise data only

Table A2. Summary of findings for articles assessing the relationship between high-rise housing and mental health (n = 25).

Reference and Study Design	Grade	Sampling Method	Type of Housing	Subject's Age, Gender and Ethnicity	Number of People	Health Specialty	Findings of Note
[41] Random Assignment	A	Doctor's Records	Flats vs. houses	Women with medical issues (first consults) from the United Kingdom/Canada	1500	Mental/Psychoneurotic	Social isolation of women in flats
[53] Cross-sectional	A	Survey	High-rise vs. low-rise	Public housing residents (United States)	915	Alienation	Significantly higher levels of alienation in high rise buildings
[54] Cross-sectional	A	Survey	High-rise vs. two stories with a garden	Women (United Kingdom)	69/43	Neuroticism and Medical Doctor (MD) visits	House dwellers had fewer neurotic scores and fewer visits to MD with nervous disorders
[56] Cross-sectional	A	Survey	High-rise vs. low-rise v. houses	Women (United Kingdom)	75	Psychological problems	More loneliness and depression complaints from women in high-rises
[55] Cross-sectional	A	Survey	Flats vs. houses	British and Canadian servicemen's wives	169	Depression	Women living in houses had less depression than those living in flats
[45] Cross-sectional	A	Survey	Flats vs. houses	British and Canadian servicemen's wives	167/167	Psychiatric illness	Neurotic personalities living in flats more likely to experience psychiatric illness than stable personalities in flats. No similar difference in house dwellers
[42] Cross-sectional	A, C	Psychiatric Screening Survey	High-rise Floor 5+ v. Floors 1–4 vs. detached homes	Random adults from a health centre (Glasgow, Scotland)	964	Mental symptoms	People on the 5th floor or above had twice the number of mental symptoms as those on lower floors (or in other types of housing)
[48] Cross-sectional	A	Survey	High-rise vs. low-rise dormitories	Students (2nd-year freshmen) in the United States	110	Social interaction/social support	High rise dwellers found to have less social support and less socially involved
[43] Cross-sectional	A, C	Survey	Eight types of public housing Inc. high-rise	Public housing residents, Canada	442	Psychological strain	Floor level predicts higher levels of emotional strain for women
[49] Cross-sectional	A	Survey	High-rise vs. detached homes	Canada	87	Social interaction	Residents of detached homes had more contact with neighbours
[50] Random assignment	A	Survey	High-rise (14 stories) vs. low-rise (three stories)	Adults, mostly of Puerto Rican or African American descent	60	Psychological distress, social support	Greater social overload, less social networks, less attachment to the community

Table A2. *Cont.*

Reference and Study Design	Grade	Sampling Method	Type of Housing	Subject's Age, Gender and Ethnicity	Number of People	Health Specialty	Findings of Note
[13] Longitudinal	A	Survey	High-rise vs. detached homes	Women	Unknown	Depression	Fewer symptoms of depression after moving out of high-rise
[59] Cross-sectional	A	Survey	Multi-family dwellings vs. single family dwellings.	Canadian families	560	Psychiatric problems	More psychiatric problems amongst men in multi-family housing, no difference in women
[37] Cross-sectional	D	Self-reported survey	Eight types of housing area	Adults, local authority housing, United Kingdom	674 (383 households)	Psychological distress	Symptoms most prevalent in 'difficult to let' housing—location rather than type
[51] Cross-sectional	A	Survey	High-rise vs. low-rise owned apartments	Women, Israel	344	Social interaction	High-rise dwellers encountered more people, and more who were strangers
[57] Cross-sectional	A	Survey	High-rise vs. detached homes	Elderly men and women, South Africa	600	Psychological distress	High rise residents in low SES areas experienced more psychological distress
[52] Cross-sectional	A, B	Survey	High-rise v. mid-rise vs. low-rise	Adults, children and elderly, China	503	Mental health	More social contact with neighbours in low rise v. mid-rise and high-rise
[58]	D	Survey	High-rise	Elderly men, India	100	Mental health	Residents failed to cope with the stress produced by living in high-rise buildings
[47] Cross-sectional	A	Survey	High-rise vs. detached homes	Adults in four socio-economically disadvantaged sites in Melbourne, Australia	1199	Perceptions of neighbourhood factors that influence health	Residents of high-rise towers were more likely than other residents to nominate proximal aspects of the neighbourhood as having a perceived negative influence on health.
[60] Random Assignment	A	Interview	High-rise vs. detached homes	Gautreaux Program—Mothers and children, Chicago, United States	100	Sense of efficacy (control)	Residents who moved out of high-rises into detached homes reported a greater sense of efficacy including freedom from fear.

Table A2. Cont.

Reference and Study Design	Grade	Sampling Method	Type of Housing	Subject's Age, Gender and Ethnicity	Number of People	Health Specialty	Findings of Note
[18] Cross-sectional	A	Survey with interview	14 social housing areas, high-rise to low-rise	Glasgow, United Kingdom	1392 high rise/1848 houses	Residential, social, psychosocial	Poor social outcomes in high rise flats (for all factors), some psychosocial outcomes worse in high rise flats.
[28] Cross-sectional	A, C	Survey	High-rise of four floors and above, Comparison of floors 1–15	Census data, Switzerland	1,500,015 (160,629 high rise buildings)	Mortality	Mortality from all causes higher in ground floor dwellers. Suicide by jumping increased on higher floors at a rate of 0.41%.
[40] Cross-sectional	D	Self-reported Survey. Interview, Focus Groups	High-rise	Auckland, New Zealand	429 Surveys, 30 interviews, four focus groups	Social isolation	The experience and expression of social isolation was consistent across all age groups, with highest correlation between functional social isolation and “being student”, and older adults (60+ years), length of tenure in current apartment and length of time residents have lived in the inner-city.
[44] Cross-sectional	A	Self-reported Survey	High-rise vs. low-rise	Census data and Belgium Register, Belgium	2,998,227 Male 3,104,593 Female	Self-rated health	Residents' worse self-rated health in high-rise buildings can be explained by the strong demographic and socioeconomic segregation between high- and low-rise buildings in Belgium. A weak, but robust positive curvilinear relationship between floor level and self-rated health within high-rise buildings.

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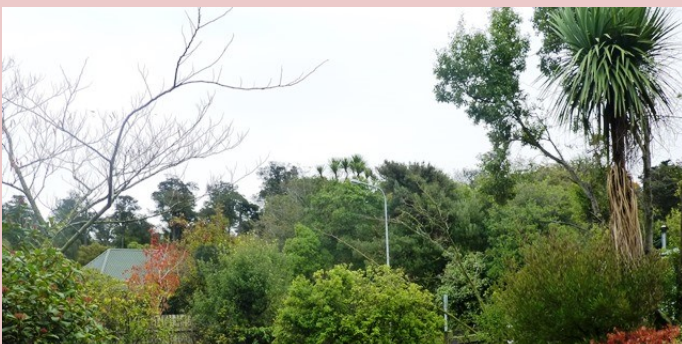
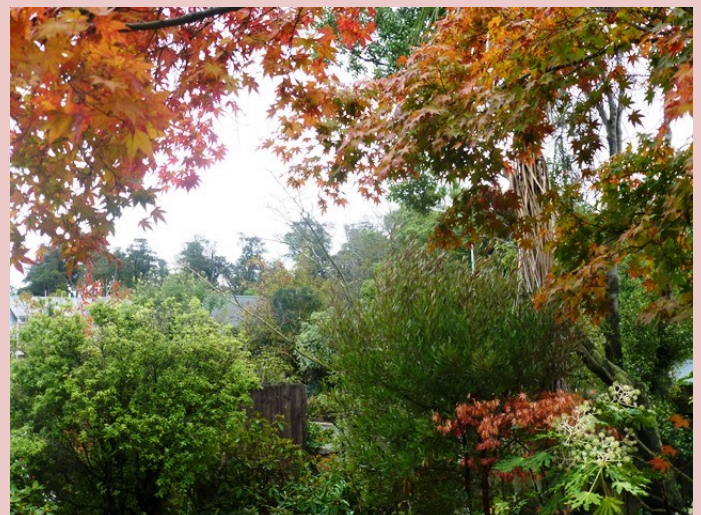
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Views from houses incorporating the foliage on sections looking across Rata Street to the backdrop of Riccarton Bush trees

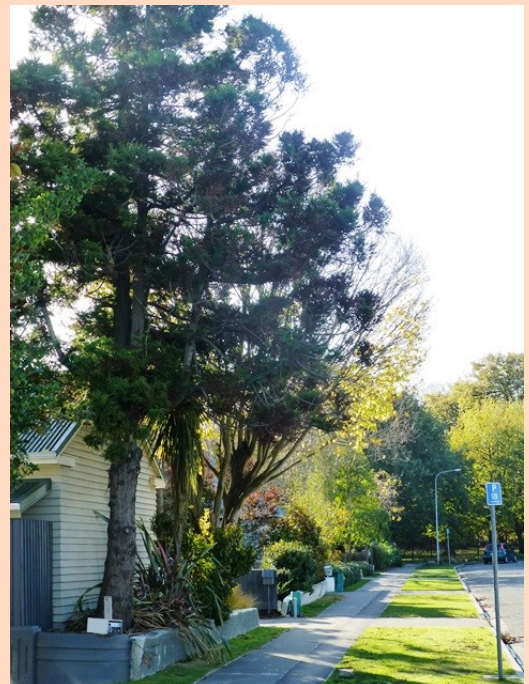
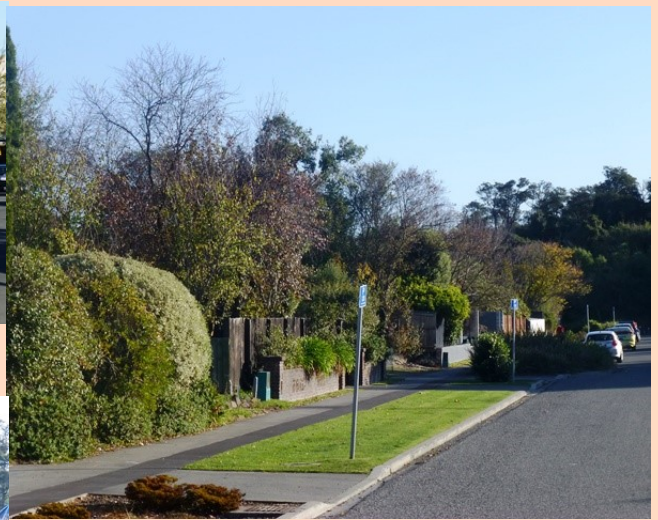
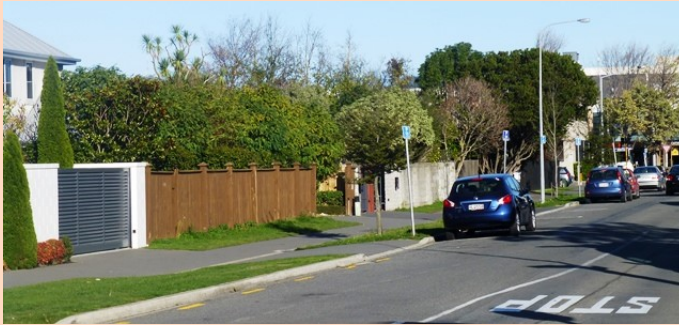
APPENDIX 6



APPENDIX 7

STREETSCAPES

in the Kauri Cluster



Urban greening can reduce impact of global heating in cities, finds study



Hackney, London. The study found urban areas are on average warming 29% more quickly than rural areas. Photograph: Bloomberg/Getty

Urban greening initiatives such as planting street trees, rainwater gardens and de-paving can help mitigate the impacts of urban heating due to the climate crisis and urban expansion, according to a study that has found cities have been warming by 0.5C a decade on average.

Scientists at Nanjing and Yale Universities analysed satellite data from across 2,000 cities and compared surface temperature readings between cities and rural areas from 2002 to 2021.

The study found on average that cities are warming by a rate of 0.56C a decade during the day and 0.43C a decade at night. In comparison, rural areas are warming by 0.4C a decade during the day and 0.37C a decade at night, which means urban areas are on average warming 29% more quickly than rural areas.

The scientists found a link between a city's size and the rate of urban warming, with megacities warming on average by 0.69C a decade during the day, compared with 0.41C a decade during the day in smaller cities.

There were also disparities in the rates of urban heating between continents, with cities in Asia – the continent with the most megacities – warming most rapidly during the day and night. Cities in Europe were found to be warming the least during the day, while cities in Oceania were warming the least at night.



Chongqing, a megacity in south-west China. There were disparities in the rates of urban heating between continents, with cities in Asia warming most rapidly during the day and night. Photograph: Mark Schiefelbein/AP

In about 90% of the cities surveyed, scientists found the climate crisis is the greatest contributor to urban warming, with about 0.3C of heating a decade attributed to human-induced climate change on average. However, scientists noted that urban expansion can also influence urban heating – in parts of China and India, rapid urbanisation is contributing to about 0.23C of urban warming a decade.

But urban greening schemes such as tree planting, in which exposed land surfaces are replaced with natural vegetation, can help reduce the rate of urban warming by producing a cooling effect particularly at night, by capturing some of the surrounding surface heat for storage, according to the report.

In Europe, urban greening has been found to offset the rate of urban warming by 0.13C a decade on average. Likewise in Chicago, an urban greening scheme to increase tree coverage after a heatwave in 1995 has helped to decrease the rate of urban warming by about 0.084C a decade.

The authors of the study have urged policymakers to consider using urban greening schemes to reduce urban warming, calling it an effective strategy that can reduce the impact of the “urban heat island” phenomenon, hence reducing the risk of exposure to future heatwaves that are much more likely to impact cities.

Jon Burke, the climate change manager at Gloucestershire council, suggested a number of greening initiatives such as rainwater gardens that can make a real difference to urban heating. He said vegetation had “a big role to play in moderating all the types of urban heating” and could bring additional social benefits such as “reduced crime and prescriptions for antidepressants”.

UK urban leaders should have taken green infrastructure investment more seriously a decade ago, he said, adding that at present “there isn’t one urban area within the UK with average canopy street cover above 40%”, which is the minimum amount of cover needed for a cooling effect to take place.

Burke said leaders needed to “initiate an urgent race” to prevent further damage from heatwaves and floods in cities, adding that there were few better investments a city could make in the health and security of its residents than urban greening.

Grahame Madge, a Met Office spokesperson, said the organisation’s “high-resolution projections” are helping local authorities to better understand the impact of extreme heat in cities.

He said: “The Met Office has been working with a number of local authorities to help inform their heat resilience strategies and planning. When they combine this information with their own mapping they gain a far clearer picture of where the areas of greatest risk are across the city ... this ability to know where to focus effort is extremely important.”

Thank you for joining us from New Zealand.

“It’s now or never” for tackling the climate crisis. That was the blunt warning that stood out from the UN’s most recent comprehensive review of climate science, drawing on the work of thousands of scientists over many years.

As environment correspondent, I’ve spent 18 years grappling with this data and reporting on the science – and this is without a doubt the starkest language yet, the strongest words I’ve ever heard from a body that is sometimes criticised for pulling its punches, and whose conclusions are often vetted and watered down by world leaders keen to diminish their impact.

The truth is that this latest report is the last one to be published while we still have a realistic chance of limiting global heating to 1.5C above pre-industrial levels.

At the Guardian, we feel that up-to-date, fact-checked, independent journalism is key to taking meaningful action. That’s why we have been reporting on global heating for decades, and giving scientific findings more publicity and prominence than any other news organisation. We have put the climate crisis at the heart of our work, knowing that accurate information is essential for the future of humanity, and the health of planet Earth.

Waseem Mohamed

Thu 29 Sep 2022 17.48 BST

First published on Thu 29 Sep 2022 17.47 BST

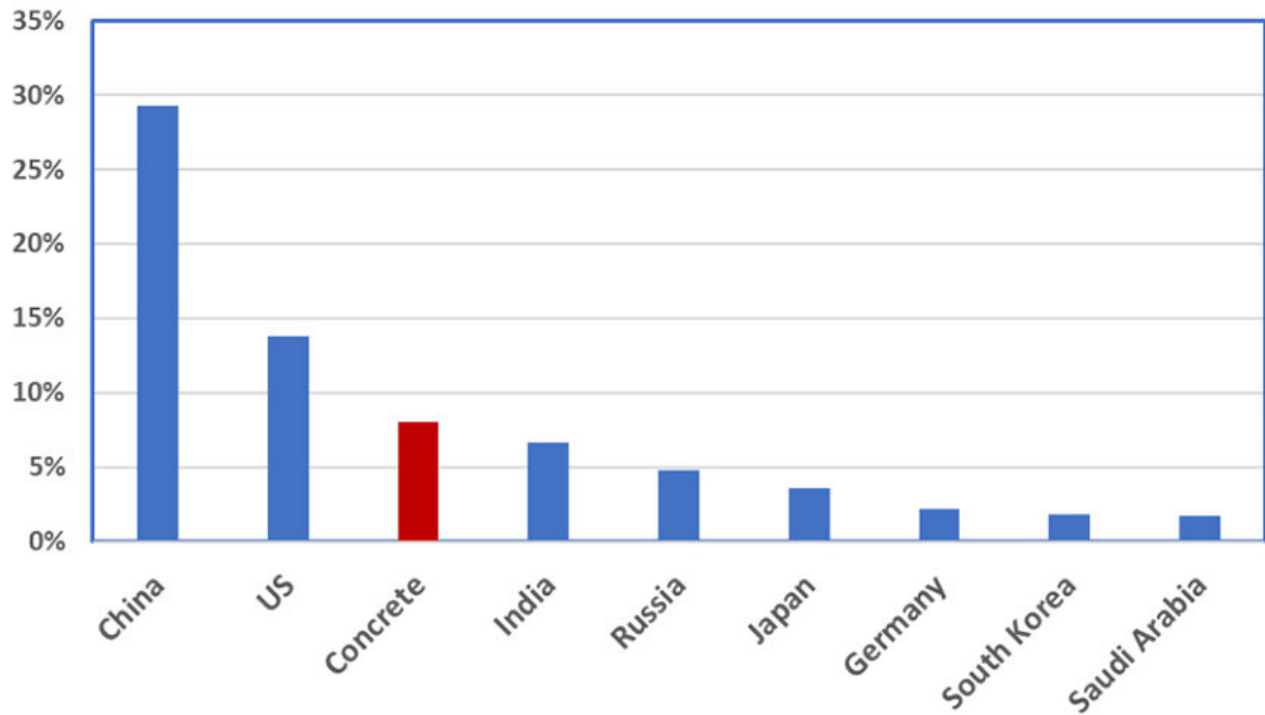
<https://www.theguardian.com/environment/2022/sep/29/urban-greening-reduce-impact-global-heating-cities-study#:~:text=Urban%20greening%20initiatives%20such%20as,C%20a%20decade%20on%20average.>

Global Warming Has Concrete Problem When It Comes to CO2

[ecori.org/climate-change/2019/10/4/global-warming-has-a-co2ncrete-problem](https://www.ecori.org/climate-change/2019/10/4/global-warming-has-a-co2ncrete-problem)

Jo Detz

October 4, 2019



If concrete were a country, it would be the third-highest emitter of carbon dioxide.

Graphics and text by ROGER WARBURTON/ecori News contributor

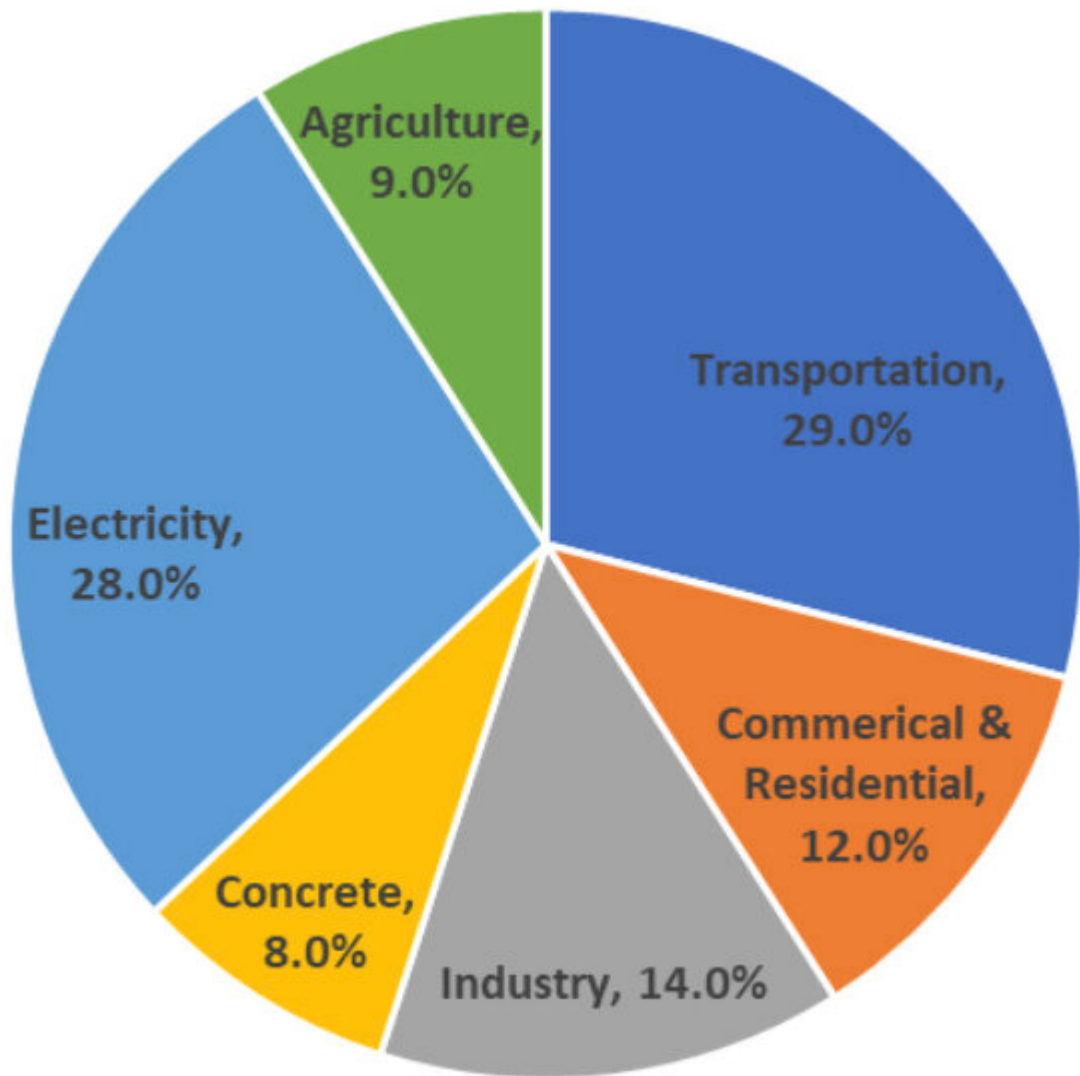
Concrete is a major contributor to the climate crisis because its production releases huge quantities of carbon dioxide into the atmosphere. Carbon dioxide and methane are the two greenhouse gas most responsible for global warming.

The carbon dioxide emissions from the production of concrete are so high that if concrete were a country, it would be the third-largest emitter of CO2 behind China and the United States.

Concrete is the most widely used artificial material in existence. The only thing we consume more of is water.

Concrete
currently
accounts
for about

8 percent
of the
carbon
dioxide
being
emitted
into the



Carbon dioxide emissions by business sector.

atmosphere, dwarfing the aviation industry's contribution of 2.5 percent. Concrete's contribution of CO₂ is comparable to the entire agriculture industry, which is responsible for 9 percent of carbon emissions.

The central ingredient in concrete is cement, which is made by crushing limestone and clay and adding iron ore or ash. The mixture is heated in a kiln to more than 2,600 degrees Fahrenheit, a process that consumes vast quantities of fossil fuel.

When heated, the calcium carbonate in limestone breaks into calcium oxide and carbon dioxide, which is released into the air. The calcium oxide is ground with limestone and gypsum to make cement.

Half of the CO₂ emissions in the production of concrete come from the reaction that breaks up the calcium carbonate and the other half from the fossil fuels required to heat the kilns and transport the materials.

To help understand the scale of the concrete problem, here's a local example. Let's start by calculating the carbon dioxide released by the concrete in a single lane of an interstate highway.

According to the Federal Highway Administration, an interstate lane is 11 inches thick and 12 feet wide. Therefore, the volume of concrete in a mile (5,280 feet) of concrete is: $11/12 \times 12 \times 5,280 = 58,080$ cubic feet.

One cubic foot of concrete weighs 150 pounds, so the concrete in a mile of interstate lane weighs: $58,080 \times 150 = 8.7$ million pounds.

The National Ready Mixed Concrete Association says that, during production, each pound of concrete releases 0.93 pounds of carbon dioxide. Therefore, the CO2 released in the construction of a mile of a single interstate lane is: $0.93 \times 8.7 \text{ million} = 8.1$ million pounds of carbon dioxide.

The length of Interstate 95 through the state of Rhode Island, from Connecticut to Massachusetts is 43.3 miles. I-95 is four lanes in the south and six lanes through Providence. If we add the 4.3 miles of Interstate 195 from Providence to the Massachusetts line, the interstates in Rhode Island account for 242 miles of lanes.

Therefore, the construction of the Rhode Island interstates released $242 \times 8.7 \text{ million} = 2$ billion pounds of carbon dioxide.

To provide a context for that number, let's compare it to the emission of carbon dioxide from our cars. The Department of Transportation says that in 2017 the average Rhode Islander drove 12,781 miles.

In 2017, average U.S. gasoline consumption was 24.7 miles per gallon, up slightly from 2016, but well-below the government's target. Therefore, each of us used about 517 gallons of gas.

Each gallon of gas releases 18.1 pounds of carbon dioxide into the atmosphere. It may be surprising that a gallon of gas, which weighs 6.3 pounds, makes 18.1 pounds of CO2 when it burns.

That is because gasoline is made of octane and each octane molecule has a string of eight carbon atoms. When octane burns, each of the eight carbon atoms grabs two oxygen atoms from the air to make eight CO2 molecules.

Therefore, the 517 gallons of gas consumed by each Rhode Islander emitted $517 \times 18.1 = 9,356$ pounds of CO2 into the air.

The 2 billion pounds of carbon dioxide released in the construction of Rhode Island's

interstates is equivalent to the following number of drivers:

$$\frac{2,000,000,000}{9,356} = 213,766$$

That is, the carbon dioxide released in the building of Rhode Island's interstates was the same as the CO2 released by the burning of an entire year's worth of gas by more than 213,000 local drivers.

Of course, building the interstates was a one-time event and we continue to drive our cars every year. On the other hand, we only calculated the carbon dioxide from the interstates, which are a small fraction of the roads in Rhode Island.

The lesson is that the climate crisis is a complex problem, requiring simultaneous action in many areas, including concrete production.

Roger Warburton, Ph.D., is a Newport, R.I., resident.



Bob Broughton <bob@broughton.co.nz>

Re: Affordability

Mike <mikeyardley@xtra.co.nz>

Fri, Dec 23, 2022 at 4:02 PM

To: RBK Residents Assoc <rbkresidents@gmail.com>

Will give it a good read.
Thanks so much Tony.

On 23/12/2022 15:33 NZDT RBK Residents Assoc <rbkresidents@gmail.com> wrote:

Separate but very closely related, during our back and forth correspondence on intensification Megan Woods made the point to the media, (after we challenged the government on the need for Christchurch to densify to the extent proposed) that the intensification legislation was needed to address serious housing supply and affordability issues in Christchurch.

It was bunkum then and is still bunkum now. Witness the attached very recent study by JLL and the associated table (also attached) that ranks NZ districts and cities by affordability.

Stuff did a story on this JLL study, but ignored Christchurch. Or perhaps it did not have access to the table, or decided the Auckland angle was more important :(.

Tony

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Riccarton Bush - Kilmarnock Residents' Association

You can join our association by emailing name/s, street address and phone details to rbkresidents@gmail.com. Then pay \$5 each via internet banking to Account 02 0820 0531755 00 with surname as a reference. Alternatively, deliver the subscription to the Treasurer at [25 Rata St.](#)

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Christchurch is easily New Zealand's most affordable big city

Thursday 29 December, 2022

New research looking at housing affordability shows Christchurch is the most affordable big city in New Zealand based, not just on price, but also on household income.

[The study](#) by international property consultancy JLL focussed on how different thinking might solve our country's housing crisis. [The data behind it](#) shows Christchurch is more affordable than all other major centres and is also more affordable than most of the other 66 cities and districts it measured across the country.

The most expensive areas, relative to income, are the holiday spots. In Thames-Coromandel the ratio between median prices and household earnings, was 14 times the median household income. Auckland was not far behind with a ratio of 11. The Queenstown Lakes District is the 7th least affordable.

Christchurch, on the other hand, is 27th on the list, more affordable than Auckland, Hamilton, Tauranga, Rotorua, Wellington, Nelson and Dunedin. It is also, according to the research, more affordable than smaller North Island cities like Napier, Whangarei, Whakatane, New Plymouth, and Palmerston North.

JLL strategic consultancy head Jonathan Manns said the holiday locations are least affordable because wages in those areas are lower but the cost of housing remains high because holiday-maker demand. The most affordable areas tend to be those that are less accessed or accessible.

This new way of measuring affordability shows a new policy of rebalancing housing demand should be adopted, he said. "If the government was to focus on stimulating growth outside Auckland and Wellington, across both the North and South islands, it could enhance demand elsewhere and breathe new life into communities".

The research accepts inflation and rising interest rates have softened the housing market but says there are no indications of a long-term correction, either in terms of decreased pricing or increased supply. In other words, if we continue as we are there are no signs the affordability gap will close, it said.

The research also argues policy-makers should stop treating the housing crisis as solely a housing issue. It suggests focussing on other solutions like creating more attractive liveable cities, providing better access to finance and coming up with more creative home ownership models, including rent-to-own.

The study also takes a swipe at new laws enabling widespread medium-density residential development. It says while this is appropriate in smaller settlements there is serious risk it will create unsustainable patterns of growth. The emphasis should be on brownfields first, taking a high-density and transit-oriented approach which encourages densification in locations where the infrastructure exists to support it.

Affordability Ranking	City-District	Median House Price vs Median Household Income	Affordability Ranking	City-District	Median House Price vs Median Household Income
1	Grey District	3.6	34	Wellington City	7.3
2	Westland District	4.6	35	Waipa District	7.4
3	Gore District	4.6	36	Matamata-Piako District	7.4
4	Southland District	4.8	37	Whanganui District	7.5
5	Ashburton District	4.9	38	Gisborne District	7.6
6	Ruapehu District	5.0	39	Dunedin City	7.8
7	Buller District	5.0	40	Upper Hutt City	7.8
8	Waitomo District	5.0	41	New Plymouth District	7.8
9	Wairoa District	5.1	42	Central Otago District	7.9
10	Clutha District	5.2	43	Hamilton City	7.9
11	Invercargill City	5.2	44	Porirua City	7.9
12	Otorohanga District	5.2	45	Nelson City	7.9
13	Waimate District	5.3	46	Lower Hutt City	8.0
14	Timaru District	5.5	47	Hastings District	8.1
15	South Waikato District	5.6	48	Carterton District	8.1
16	South Taranaki District	5.8	49	Whakatane District	8.2
17	Tararua District	5.8	50	Taupo District	8.4
18	Selwyn District	5.9	51	Waikato District	8.4
19	Rangitikei District	6.0	52	Horowhenua District	8.5
20	Hurunui District	6.2	53	Hauraki District	8.5
21	Kaikoura District	6.2	54	Masterton District	8.6
22	Mackenzie District	6.3	55	Whangarei District	8.9
23	Manawatu District	6.4	56	Napier City	8.9
24	Waimakariri District	6.5	57	Tasman District	8.9
25	Waitaki District	6.5	58	Western Bay of Plenty District	9.1
26	Stratford District	6.6	59	South Wairarapa District	9.3
27	Christchurch City	6.8	60	Queenstown-Lakes District	9.4
28	Central Hawke's Bay District	6.9	61	Tauranga City	9.8
29	Marlborough District	6.9	62	Far North District	10.4
30	Opotiki District	6.9	63	Kapiti Coast District	10.5
31	Palmerston North City	7.0	64	Kaipara District	10.5
32	Rotorua District	7.0	65	Auckland	11.4
33	Kawerau District	7.1	66	Thames-Coromandel District	14.0



CANTERBURY CONSTRUCTION REPORT[®]



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BLACKBURN
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**ASSOCIATE
MEMBER**

MULTI-UNIT DEVELOPMENTS CHRISTCHURCH CITY



Canterbury Construction Report[©]

2018 to 2022

Multi-Unit Developments

Christchurch City

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

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

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

Please Note:

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

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

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

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

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

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

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

Photographs, Images and Pictures

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About this Report

This report looks at the development of new multi-unit residential construction in Christchurch.

It details new residential building consents issued in the City since 2018.

The purpose of this report is to provide a detailed analysis of the Multi-Unit market with the aim of giving a “wood for the trees” view point.

This report details the following information:

- Number of dwellings consented
- Cost of construction
- Size of dwellings
- Where these developments are being built (location maps)
- Population numbers
- Top applicants

The report is broken down into five main sections

- Executive Summary
- Introduction and Background and External Influences on the Market
- Analysis of the Market by Year (five years, 2022 back to 2018)
- Analysis of the market by Applicant (top 10 for 2022)
- Appendices and Data

Contents

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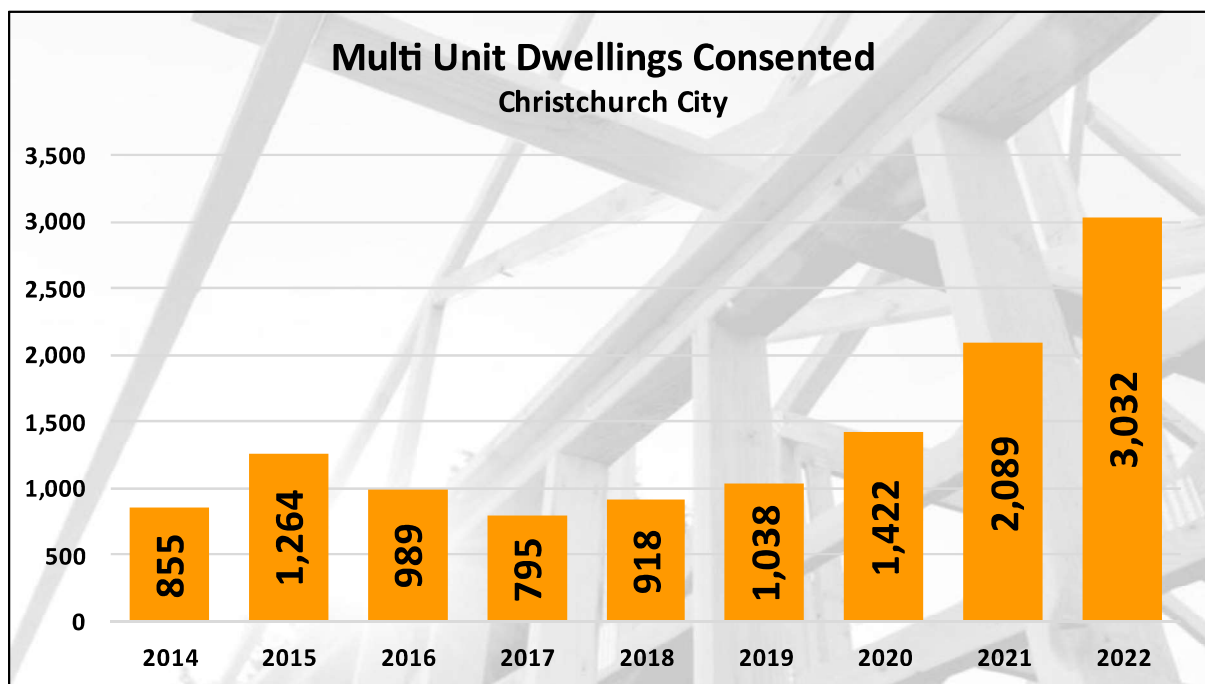
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Executive Summary

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

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

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



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

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

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

This has been a continuing trend since 2017.

The median size of these multi-unit dwellings is just 77 m² (on average, that's about 1.5 bedrooms).

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

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

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

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

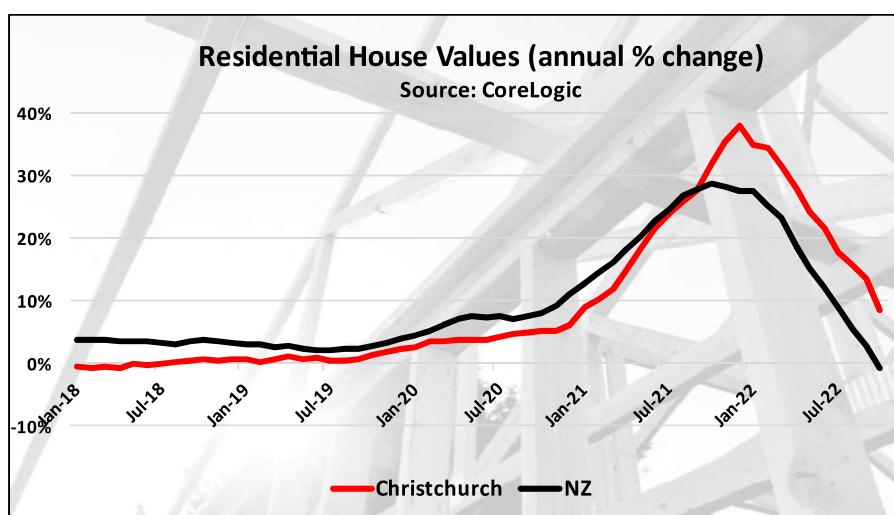
Many of the developments currently under construction were sold six or 12 months ago. With projects taking longer to sell in 2022, this will inevitably flow through to a slowdown in new building consents into 2023.

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

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

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

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



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

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

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

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

We could see this decline continue through into 2024.

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

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

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

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

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

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

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

Please give me a call if you have any questions.

A handwritten signature in blue ink that reads "Mike Blackburn". The signature is written in a cursive, flowing style with a horizontal line underneath the name.

Mike Blackburn

January 2023.

Key market indicators for 2023

Sales for new units will remain slow

In 2022, sales for new residential multi-unit dwellings fell significantly. 2023 should see a continued decline in demand.



Interest rates will continue to increase

The Reserve Bank has forecast ongoing increases in the Official Cash Rate. This will see the demand for new mortgages decline.



Inflation will remain high

The flow on effect to the construction industry is that buyers will have less money to spend and the cost of building materials and services will go up.



It will be harder to get mortgage and development finance

The tighter lending market continues to make it difficult for first home buyers, investors and developers to borrow money.



Cost of construction will continue to increase

On top of high inflation, the new H1 (Healthy Homes) Regulations apply from this year. This could add 20% to 30% to the cost of construction.



Population growth in Christchurch will be lower than its neighbours

The Christchurch population is declining (only slightly, -0.5% in 2021 and -0.2% in 2022), while Selwyn (+5% in 2022) and Waimakariri (+2%) continue to grow.



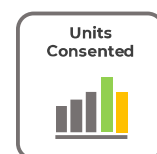
Many development sites are being redesigned, put on hold or sold

With sales much harder to find, developers are considering what to do with sites they own or have options on. Delays and changes are inevitable.



The number of new units being consented will fall by up to 30%

Its only a matter of time (sooner rather than later) that the slow sales in 2022 will flow through a reduction in the number of building consent applications for multi-unit developments.



The real questions...is by how much will numbers fall?

For a full analysis of all building consent applications and related information please read this report in association with the accompanying spreadsheet.

Additional and specialist analysis is available on request.

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3

WHAT IS NEIGHBOURHOOD CHARACTER?

3.1 DEFINITION

The concept of Neighbourhood Character, its components and its value has been widely discussed and debated over the last ten years in Victorian planning. It has been demonstrated well that neighbourhood character is something that can have a range of meanings for different people or situations and is difficult to define.

In the neighbourhood character studies that Planisphere has undertaken, we have attempted to arrive at a definition of neighbourhood character to form the basis of our study methodology. This understanding of what constitutes neighbourhood character has been developed over the course of many studies and collaboration with local communities, Councils, the former Department of Infrastructure (DOI), the Department of Sustainability and Environment (DSE), and the Department of Planning and Community Development (DPCD).

The purpose of this chapter is to provide the reader with a clear understanding of Neighbourhood Character: What does it mean; how is it practically administered within the statutory framework; what are the principles of Neighbourhood Character; and what are Neighbourhood Character typologies?

WHAT IS NEIGHBOURHOOD CHARACTER?

In December 2001, the former Department of Infrastructure published a General Practice Note titled 'Understanding Neighbourhood Character'. The Note contains useful information, however it fails to provide a single, all-encompassing and concise definition of neighbourhood character. Perhaps the most succinct definition provided in the document is that 'neighbourhood character is essentially the combination of the public and private realms'. The document suggests a number of factors as relevant, which to the reader may appear to obscure, rather than illuminate, the essence of neighbourhood character. Yet there have been useful previous statements on this subject, either auspiced by the former Department of Infrastructure, or produced by independent panels.

A more succinct and encompassing definition were included in the Draft Practice Note on Neighbourhood Character published in June 2000 as part of the first draft of ResCode:

Neighbourhood character is the interplay of natural, built social, cultural and economic conditions that make one place different from another.

This definition is helpful, but it has a number of weaknesses:

The focus does not remain on the meaning of neighbourhood character that is reflected in tools provided in the Victoria Planning Provisions (VPPs).

The adjective 'qualitative' is excluded when using the term 'interplay'.

The reference to 'combination of the public and private realms', which is in the current Practice Note, is not included.

It is true that people attribute widely differing meanings to the term 'neighbourhood character'. For many, character is about the people who live in the area; for others it is broad attributes of the area, such as closeness to shops or transport, how much open space or traffic there is. Because this character study has been commissioned to provide planning scheme policies and controls, it needs to be focussed on the physical planning outcomes that are capable of being influenced by planning scheme tools. Fundamentally we are aiming to answer the question: how do buildings and landscape interact? Built form, vegetation and topographical characteristics are the physical manifestation of neighbourhood character addressed in the VPPs. The former Good Design Guide used these terms in defining neighbourhood character.

The term 'interplay' in the former Practice Note comes from the 1998 Advisory Committee report on the City of Monash neighbourhood character 'local variations' amendment. Monash have amended their Scheme to include the Monash Neighbourhood Character study, and have also made changes to the Schedule of the Residential 1 Zone.

The Monash report coined the phrase 'qualitative interplay'. Qualitative interplay refers to the way that the main distinctive

components of an area's character combine to produce a particular sense of place. This concept carries important implications:

Neighbourhood character needs to be described in a written character statement; it is insufficient to simply produce a catalogue or list of characteristics.

Character statements must be skilfully written to describe the synthesis of qualities that make one area distinct from another.

Character statements should make clear which characteristics are most important, and the manner in which they relate to each other.

The term 'qualitative interplay' transcends 'private and public domains', as the Monash report emphasises. The character of buildings and their grounds cannot be divorced from the character of the street scene in which they sit. For example, in the inner suburbs of Melbourne buildings often present as solid 'walls' to the street, producing a hard, urban character. In some landscape-dominated areas on the urban fringe, natural bush vegetation flows across private property and public domain alike, only stopping at the edge of the roadway. Clearing all the trees on a private allotment would completely change the character of this type of area. So would the construction of kerb, channel and footpath, or planting of street trees of an incompatible species or in a formal pattern.

Therefore, in summary, neighbourhood character is a synthesis of public and private domain characteristics, as listed in the provisions of ResCode. It is the qualitative interplay between those characteristics that make a place, town or neighbourhood distinctive. Some of these characteristics are more important than others in creating a distinctive character.

Surveying all characteristics, then listing the 'key' characteristics, is a useful analytical tool. However a written statement that explains the interplay of the character components is necessary to properly describe, assess and evaluate the character of a particular area. This is the theoretical and statutory basis for the Preferred Character

Statements that have been drafted for each precinct within the study area (as detailed in Section 4).

The following definition of neighbourhood character, used by a former Department of Infrastructure working party into neighbourhood character that met in late 1999, seems to us to accommodate all of these requirements. It forms the basis of the work undertaken in this Neighbourhood Character Study:

Neighbourhood character is the qualitative interplay of built form, vegetation and topographic characteristics, in both the private and public domains that make one place different from another.

NEIGHBOURHOOD CHARACTER ELEMENTS

In many areas, building type, era and spacing, the proportions and combined appearance of the 'walls' and 'floor' of the street space, and the amount and type of vegetation, are the key determinants of the area's character. How the buildings 'sit' in their landscape is critical. Vegetation includes street trees, front garden vegetation, and canopy trees in rear yards and public reserves forming a backdrop. Critical elements of the 'walls' and 'floor' of the street space are the height, permeability and profile of the 'walls': the depth of front setbacks; type of garden (eg lawn and roses, shrubs and trees, or an apparent continuation of the street space planting); presence and permeability of a front fence; and the formality (or otherwise) of the street space.

Other character components can include traffic, noise, type of activity, and demographic characteristics. Members of the public often cite these as important characteristics of their neighbourhood. People often raise amenity issues such as access to open space in character consultation sessions. All of these can be argued to be an essential part of an area's character.

FOCUSSING ON PLANNING SCHEME IMPLEMENTATION OPTIONS

The important question in each case is how relevant is this to the task in hand? In preparing policy and controls for implementation through the planning scheme, the focus of the study needs to be on

elements that are mentioned in either ResCode provisions or overlay controls and can therefore be addressed and influenced by the appropriate statutory tools. Many neighbourhood character elements can be addressed through other mechanisms such as social development strategies or public awareness campaigns that are outside the scope of planning schemes.

NEIGHBOURHOOD CHARACTER IS NOT

The differentiation between different types of character areas is not simply a question of architectural style or era of development. Neighbourhood character is also founded on the siting and building form of the area, and the way that the buildings interact with and relate to the landscape. These factors should be the basis for the application of neighbourhood character policies. Neighbourhood character is not about the imposition of design styles. Rather it should be about recognising the distinctive characteristics of different urban forms, and their relationship to topography and vegetation. Getting this right is the best way of maintaining and enhancing the sense of place of the municipality's residential areas.

Neighbourhood character is not about the amenity of adjoining properties or dwelling densities as such, although it has implications for both of these issues. In practical terms it does not dictate planning controls for either. For example, the recommended guidelines contained in the area papers with regard to spaciousness between dwellings may require that new buildings should be setback from both side boundaries. This may reduce the amount of buildings that can be accommodated on a site, and may also reduce potential amenity impacts from overlooking and overshadowing of adjoining properties. Front setback controls may also have a similar effect in some instances. These are secondary outcomes of the neighbourhood character guidelines, and whilst not the primary intent, may reduce community concerns about other aspects of new development.

Character is not about density controls. ResCode makes no provision for density controls, and it is not considered that a policy which proposed density maximums or medium density housing saturation levels would be supported by the DPCD. ResCode has more

extensive provisions relating to amenity issues and it is likely that once these provisions become more widely implemented many amenity concerns will be reduced.

HOW DOES NEIGHBOURHOOD CHARACTER DIFFER FROM HERITAGE?

Character and heritage share many attributes, but there are important differences between the two concepts.

The basis of neighbourhood character is that every place has character, regardless of its age or appearance. However, some areas may be considered to have a more significant character than others. There are no set criteria for assessing the significance of neighbourhood character. Community feedback is an important means by which the value of character can be understood and community values are a key justification for its protection. In some areas, policies to improve or transform character may be appropriate.

While all areas have a history or heritage, actual heritage significance is determined by assessment against statutory criteria. The criteria is set out in the Burra Charter and embodied in legislation. Heritage studies designate levels of significance for sites or precincts by assessment against these criteria by way of comparison with other heritage places.

As previously noted, character studies principally evaluate the interplay of built form, vegetation and topographical qualities, with reference to the style and age of buildings where relevant. Heritage studies evaluate cultural heritage significance. This may include some reference to built form, vegetation and topographical qualities. However, it is more concerned with understanding how a particular place represents the history and evolution of an area and the people who have lived there or activities that have taken place.

3.2 CHARACTER PRINCIPLES

The following principles of neighbourhood character were prepared by a former Department of Infrastructure working party into neighbourhood character that met in late 1999. They were included in the Draft Practice Note on Neighbourhood Character published in June 2000 as part of the first draft of ResCode. These form the basis of the process and content of the work undertaken by Planisphere for neighbourhood character studies. The principles are:

COMMUNITY VALUES

The values of the local community are part of determining the appropriate response to neighbourhood character. Planning controls that aim to protect, change or improve character must draw on professional and community views.

The community should be involved in identifying the neighbourhood character measures appropriate to their area. Professionals assist in developing and translating these ideas into techniques to manage design.

PHYSICAL FOCUS

Character, in its broadest sense, can include environmental, social and economic factors, but the planning system is concerned with managing the physical evidence of character and related social impacts.

The planning system is primarily focussed on achieving a wide range of objectives through the physical environment. Character is not concerned only with the private domain, as much of neighbourhood character is manifested in the public street space. However, some character issues are related to social outcomes or impacts. For example, the height of front fences is a town planning issue with character implications that may be physical (does a high fence contribute positively to the 'look' of the area?) and social (how do high fences affect social interaction?).

SPECIAL QUALITIES OF AN AREA

All areas have a character that can be described, evaluated and, in many cases, improved. In some areas protection of particular qualities may be warranted.

The aim in placing greater priority on character is to improve the quality of the environment throughout Victoria's residential areas. For this reason, neighbourhood character is equally relevant everywhere. Planning controls should aim to protect identified distinctive and valued elements.

INTERACTION BETWEEN ELEMENTS OF CHARACTER

Character is about the interrelationships between various elements of an area, and so cannot be described or evaluated by considering individual elements in isolation.

Design responses need to consider the whole picture of a neighbourhood, rather than focussing upon one or two elements of the building form or siting.

NEIGHBOURHOOD CHARACTER AND OTHER PLANNING POLICIES

State and Council policies provide the rationale for decisions about whether to protect, change or improve the neighbourhood character of an area. Area-specific controls should be developed in the light of these strategic directions.

A Council's Municipal Strategic Statement will provide guidance about priorities in any particular area. Local housing issues and other State planning policy directions such as focusing higher density development around activity centres will be important considerations.

PREFERRED CHARACTER

Neighbourhood character descriptions and evaluations should focus on the preferred character of an area.

Descriptions of existing characteristics are an important part of the process of identifying the 'starting point', but the desired character

needs to be evaluated and considered in the context of other policy priorities. It may be that some areas should be encouraged to develop a new character, just as there may be some areas where critical elements need to be protected or reflected in all new development. The concept of preferred character is discussed in detail in Section 4.

NEIGHBOURHOOD CHARACTER TYPOLOGIES

There are a limited number of consistent precinct types that can be defined, and frequently appropriate policy responses can be formulated without the need for expensive studies.

The 'Responding to Neighbourhood Character' ResCode Practice Note has adopted this approach in presenting possible policy responses to three typical residential character types. This is not to say that detailed analysis can be completely avoided, but much can be gained from shared understandings. Many councils have undertaken very detailed character studies and this information may supplement the examples provided.

SITE ANALYSIS

A site analysis, specifically from the neighbourhood character perspective, is necessary whether or not a detailed character study has been undertaken.

A site analysis is necessary to identify characteristics that might be unusual or particular to the locality. This may not prescribe the answer, but inform the decision. A site analysis should be undertaken as part of the development assessment process. This is discussed in detail in the Implementation section.

CHARACTER AND HERITAGE

Character and heritage share many attributes, but there are important differences between the two concepts. Community values are a key justification for the protection of neighbourhood character. Policies to transform character may be appropriate in some areas.

Character studies evaluate the interplay of built form, vegetation and topographical qualities, with reference to styles and ages where relevant, whereas heritage studies evaluate cultural heritage significance, with some reference to built form, vegetation and topographical qualities. Heritage studies designate levels of significance for sites or precincts by assessment against established criteria and by way of comparison with other heritage places. The basis of neighbourhood character is that every place has character regardless of its age or appearance and community feedback is an important means by which the value of this character can be understood.

CHARACTER AND AMENITY

The difference between neighbourhood character and amenity must be recognised.

Character and amenity are terms often used interchangeably, but issues of immediate impacts on adjoining properties like visual and acoustic privacy and overshadowing should continue to be treated as issues separate to neighbourhood character.

3.3 CHARACTER TYPES

FOUR NEIGHBOURHOOD CHARACTER TYPES OF VICTORIA

Neighbourhood character is a fundamental of sense of place in residential communities. While many councils have undertaken neighbourhood character studies, little or no attempt has been made to generalise the findings of these studies into a typology of neighbourhood character types. Broadly speaking, the following neighbourhood character types have been identified across Victoria:

TABLE 1 VICTORIAN NEIGHBOURHOOD CHARACTER TYPES

BUILT FORM / LANDSCAPE RELATIONSHIP	CHARACTER TYPE
Built form dominated residential areas	'Inner Urban'
Spacious residential areas in a garden setting (formal street pattern, generally modified grid)	'Garden Suburban'
Spacious residential areas in a garden setting (informal, generally curving street pattern with courts/cul-de-sacs)	'Garden Court'
Landscape dominated residential areas	'Bush Suburban'

These four broad categories illustrate the four main types of residential areas that exist in Victoria, from an urban design perspective. The differentiation between these types is not based on architectural style or era of development. It is founded on the layout and form of the areas, and the way that the built form interacts with and relates to the landscape. These factors should be the basis for the application of neighbourhood character policies. Neighbourhood character is not about the imposition of design styles. Rather it should be about recognising the distinctive characteristics of different urban forms, and their relationship to topography and vegetation. Getting this right is the best way of maintaining and enhancing the sense of place of the state's residential areas.

An initial version of these character types, prepared by Planisphere, was included in the Draft Practice Note on Neighbourhood Character published in June 2000 as part of the first draft of ResCode. Although this Practice Note has since been superseded, it provided some useful principles about the nature of neighbourhood character. The upgraded version of the character types shown here is included in *Sense of Place: urban design principles for the Metropolitan Strategy*, a technical report on urban design prepared by Planisphere and published in October 2002 as part of the Metropolitan Strategy.

Within each of these four main character types, there can be wide variations. They are important in differentiating the character of one neighbourhood from another, and in creating or strengthening a sense of place. These variations are identified through the character survey, and are highlighted in the "Precinct Descriptions" of each Precinct Profile (refer to Appendices).

LOCAL NEIGHBOURHOOD CHARACTER TYPES

The following distinct character types were identified for Moonee Valley:

TABLE 2 MOONEE VALLEY NEIGHBOURHOOD CHARACTER TYPES

BUILT FORM / LANDSCAPE RELATIONSHIP	CHARACTER TYPE
Architecturally diverse areas within activity centre boundaries.	Central Residential
Built form dominated residential areas with generally traditional streetscapes, and modest lot sizes.	Inner Urban
Built form dominated residential areas with contemporary streetscapes.	Urban Contemporary
Spacious residential areas in a garden setting (formal street pattern, generally modified grid)	Garden Suburban

Spacious residential areas in a garden setting Garden Court
(informal, generally curving street pattern with
courts/cul-de-sacs)

These areas were defined through the interactions between the built form, street patterns and the surrounding landscape. These features were found to heavily contribute towards the valued character and nature of each precinct.

AREAS WITH NEW AND CHANGING CHARACTER

Some areas are subject to redevelopment, or have aspects of their character that are a cause of strong concern by local people, warranting change to the physical fabric. In both these instances, the appropriate planning strategy may well be to try to improve the character of the area by changing it. Achieving a measured and consistent change in the new development character of an area requires a sound approach to planning. Definition of the new character will often require urban design skills, and the process of managing change may require a sophisticated program with community involvement.

Areas yet to be developed should be allowed to create a new character within broader parameters, such as relating to the built character of adjoining areas and expressing the underlying landscape character.

CHARACTER TYPES

INNER URBAN

Built form dominated residential areas. Examples: Melbourne's inner suburbs (eg. Carlton, Fitzroy, Port Melbourne, Williamstown)

This intensive form of subdivision, much of it into small, narrow blocks, resulted in a built form dominated character. This type of character is widespread in Melbourne's inner suburbs, but unusual outside Melbourne, except in the centre of some older regional

centres and country towns such as Bendigo and surrounding settlements. Some of these areas were subject to a planned approach, with formal street layouts and a more effective control of land release subdivision. Others grew more haphazardly, with streets of varying width, including many very narrow streets, often without connectivity, and no provision for parks and squares.

Our view of the inner suburbs of Melbourne and regional centres as living environments has been transformed in the last forty years. Originally the focus of slum clearance policies, they have since become desirable residential locations, valued for the urban lifestyle and heritage qualities. Urban designers see them as exemplars of a more sustainable urban form.

TABLE 3 INNER URBAN CHARACTER TYPE SUMMARY

DESCRIPTION	MAIN CHARACTERISTICS	PRINCIPLES
Dense, low rise residential mixed use areas serviced by strip centres.	Highly urban character with buildings dominating the street scene.	Continue to conserve the heritage areas.
Largely intact Victorian colonial suburbs of high heritage value (probably world significance) associated with the rise of Marvellous Melbourne.	Low rise scaled, narrow fronted rhythm.	Maintain and enhance the hard urban character, with its solid, fine-grain streetscape 'walls', dense, connected street and laneway networks, minimal setbacks, and pedestrian friendly environment.
A walking, horse-drawn carriage and tram-based city.	Small front setbacks, small or zero side setbacks, create unbroken 'walls' to the street.	
In outer areas, land sometimes remained undeveloped for decades, leading to mixed eras of	Front property boundary always expressed by a fence.	
	Possibility of siting new, more intense development so that it is 'hidden' from view.	
	Fine-grained, connected street and laneway pattern, highly conducive to walking and cycling.	
	Served by relatively dense	

DESCRIPTION	MAIN CHARACTERISTICS	PRINCIPLES
development (eg. Northcote)	network of strip activity centres and public transport services. Many areas of mixed use.	

GARDEN SUBURBAN

Spacious residential areas in a garden setting (formal street pattern, generally modified grid). Examples: the Melbourne middle suburbs (eg. Camberwell, Essendon, Sunshine).

The middle suburbs of Melbourne are possibly what most people have in mind when they talk about Melbourne's comfortable 'liveability', and compare its suburbs favourably as living environments with the affordable equivalents in Sydney. The middle suburbs became the crucible of the protests relating to urban consolidation, the Good Design Guide and neighbourhood character in the 1990s. Outside Melbourne, most urban residential areas have the spacious 'garden suburban' character, because densities and site coverage tend to be lower than equivalent metropolitan areas.

Most garden suburban residential areas are laid out within a north-south, east-west grid of one chain (20m) main roads (more likely to be 30m in regional Victoria). Mostly the street pattern is grid-based or grid-adapted. The roads are tree-lined avenues, often with concrete kerbs and footpaths, and grassed nature strips. Some housing has low walls fronting formal, trimmed gardens that are open to the street, and houses are located within the lot, rather than extending to its boundaries. The atmosphere of a garden suburb is one of space and trees, though the separation of private and public land is clearly defined.

TABLE 4 GARDEN SUBURBAN CHARACTER TYPE SUMMARY

DESCRIPTION	MAIN CHARACTERISTICS	PRINCIPLES
Train and tram based.	Spacious feel: space around and between buildings, open	Use a formal approach to street

DESCRIPTION	MAIN CHARACTERISTICS	PRINCIPLES
Late Victorian to 1960s / 70s.	rather than enclosed street space, large setbacks	space design (eg regular avenues of trees, regular geometry of kerbing and traffic management devices)
Grid-based street pattern.	Green and leafy appearance in many areas	Retain the spacious, green and leafy character, including views of backdrop vegetation between and over buildings, generous front garden setbacks open to view from the street, and grassed nature strip with minimal interruption
Spacious streets and gardens.	Low scale, dominant roof forms, strong horizontal emphasis	Maintain the horizontal emphasis of massing and form resulting from the dominance of the roof form
Detached houses, double or triple fronted.	Gaps between buildings	
Footpaths and nature strips and tree avenues (often exotic).	Front property boundary usually defined by low, solid fence or moderate height 'transparent' fence (eg wire mesh)	
Car storage		

GARDEN COURT

Spacious residential areas in a garden setting (informal, generally curving street pattern with courts/cul-de-sacs). Examples: Melbourne outer suburbs such as Chirnside Park, Wantirna, Carrum Downs.

From the 1960s to present time, garden court residential areas have emerged. They grew faster in the north-east, east and south-east than in the north, north-west and west Melbourne. These suburbs have grown on the fringes of Melbourne and other centres, where initially infrastructure and services were inadequate.

The term Garden Court refers to the combination of a Garden Suburban type of development superimposed on a pattern of curvilinear streets with cul-de-sacs or courts. This layout was designed to accommodate full car-based access as safely as possible, by eliminating ‘rat runs’ and providing low speed, low volume traffic environments within the courts. A negative consequence of this type of layout has been the poor connectivity of the street system for bus routes and walking.

These areas tend to be associated with car-based, stand alone retail centres. In seeking to create more sustainable urban environments, government policy will need to address these deficiencies over the long term.

The curvilinear street pattern results in the creation of informal street spaces which are often complimented by informal (often native) garden planting. There is often only one footpath, sometimes none at all.

More recent trends in Garden Court areas have seen reduced setback and road width standards, coupled with substantially increasing site coverage. Many estates of the 1990s include large numbers of two storey houses with much reduced setbacks. These changes have reduced the ‘garden’ aspect of the character, increasing the sense that the street is lined by a solid ‘wall’ of buildings. Although street and garden trees will eventually mature and ‘soften’ these streetscapes, they will continue to have a more built-form dominated character.

TABLE 5 GARDEN COURT CHARACTER TYPE SUMMARY

DESCRIPTION	MAIN CHARACTERISTICS	PRINCIPLES
Car-based 1960s/70s onwards	Pre-1990s: spacious feel – space around and between buildings, open rather than enclosed street space, large setbacks	Use an informal approach to street space design (eg informal groupings of trees, irregular geometry of kerbing and traffic
Curvilinear plus court-based street pattern		
Spacious streets and	From the 1990s: a more enclosed feel due to smaller	

DESCRIPTION	MAIN CHARACTERISTICS	PRINCIPLES
gardens	setbacks, higher site coverage and two storey development	management devices)
Detached houses, double or triple fronted	Green and leafy appearance in many areas	Retain the spacious, green and leafy character, including views of backdrop vegetation between and over buildings, generous front garden setbacks open to view from the street, and grassed nature strip with minimal interruption
Two storey houses and higher site coverage common from 1990s	Low scale and horizontal emphasis of dominant roofs (pre-1990s)	In pre-1990s areas, maintain the horizontal emphasis of massing and form resulting from the dominance of the roof form
Nature strips, often without footpaths	Gaps between buildings (less from 1990s)	
Informal street tree planting, often native	Less emphasis on separate definition of public and private domain: front gardens often not fenced	
Car storage usually off-street and behind the building line (in front of the building line in some more recent estates)		
Car-based, stand alone retail centres		

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The Monash report coined the phrase 'qualitative interplay'. Qualitative interplay refers to the way that the main distinctive

APPENDIX A

components of an area's character combine to produce a particular sense of place. This concept carries important implications:

Neighbourhood character needs to be described in a written character statement; it is insufficient to simply produce a catalogue or list of characteristics.

Character statements must be skilfully written to describe the synthesis of qualities that make one area distinct from another.

Character statements should make clear which characteristics are most important, and the manner in which they relate to each other.

The term 'qualitative interplay' transcends 'private and public domains', as the Monash report emphasises. The character of buildings and their grounds cannot be divorced from the character of the street scene in which they sit. For example, in the inner suburbs of Melbourne buildings often present as solid 'walls' to the street, producing a hard, urban character. In some landscape-dominated areas on the urban fringe, natural bush vegetation flows across private property and public domain alike, only stopping at the edge of the roadway. Clearing all the trees on a private allotment would completely change the character of this type of area. So would the construction of kerb, channel and footpath, or planting of street trees of an incompatible species or in a formal pattern.

Therefore, in summary, neighbourhood character is a synthesis of public and private domain characteristics, as listed in the provisions of ResCode. It is the qualitative interplay between those characteristics that make a place, town or neighbourhood distinctive. Some of these characteristics are more important than others in creating a distinctive character.

Surveying all characteristics, then listing the 'key' characteristics, is a useful analytical tool. However a written statement that explains the interplay of the character components is necessary to properly describe, assess and evaluate the character of a particular area. This is the theoretical and statutory basis for the Preferred Character

Statements that have been drafted for each precinct within the study area (as detailed in Section 4).

The following definition of neighbourhood character, used by a former Department of Infrastructure working party into neighbourhood character that met in late 1999, seems to us to accommodate all of these requirements. It forms the basis of the work undertaken in this Neighbourhood Character Study:

Neighbourhood character is the qualitative interplay of built form, vegetation and topographic characteristics, in both the private and public domains that make one place different from another.

NEIGHBOURHOOD CHARACTER ELEMENTS

In many areas, building type, era and spacing, the proportions and combined appearance of the 'walls' and 'floor' of the street space, and the amount and type of vegetation, are the key determinants of the area's character. How the buildings 'sit' in their landscape is critical. Vegetation includes street trees, front garden vegetation, and canopy trees in rear yards and public reserves forming a backdrop. Critical elements of the 'walls' and 'floor' of the street space are the height, permeability and profile of the 'walls': the depth of front setbacks; type of garden (eg lawn and roses, shrubs and trees, or an apparent continuation of the street space planting); presence and permeability of a front fence; and the formality (or otherwise) of the street space.

Other character components can include traffic, noise, type of activity, and demographic characteristics. Members of the public often cite these as important characteristics of their neighbourhood. People often raise amenity issues such as access to open space in character consultation sessions. All of these can be argued to be an essential part of an area's character.

FOCUSSING ON PLANNING SCHEME IMPLEMENTATION OPTIONS

The important question in each case is how relevant is this to the task in hand? In preparing policy and controls for implementation through the planning scheme, the focus of the study needs to be on

elements that are mentioned in either ResCode provisions or overlay controls and can therefore be addressed and influenced by the appropriate statutory tools. Many neighbourhood character elements can be addressed through other mechanisms such as social development strategies or public awareness campaigns that are outside the scope of planning schemes.

NEIGHBOURHOOD CHARACTER IS NOT

The differentiation between different types of character areas is not simply a question of architectural style or era of development. Neighbourhood character is also founded on the siting and building form of the area, and the way that the buildings interact with and relate to the landscape. These factors should be the basis for the application of neighbourhood character policies. Neighbourhood character is not about the imposition of design styles. Rather it should be about recognising the distinctive characteristics of different urban forms, and their relationship to topography and vegetation. Getting this right is the best way of maintaining and enhancing the sense of place of the municipality's residential areas.

Neighbourhood character is not about the amenity of adjoining properties or dwelling densities as such, although it has implications for both of these issues. In practical terms it does not dictate planning controls for either. For example, the recommended guidelines contained in the area papers with regard to spaciousness between dwellings may require that new buildings should be setback from both side boundaries. This may reduce the amount of buildings that can be accommodated on a site, and may also reduce potential amenity impacts from overlooking and overshadowing of adjoining properties. Front setback controls may also have a similar effect in some instances. These are secondary outcomes of the neighbourhood character guidelines, and whilst not the primary intent, may reduce community concerns about other aspects of new development.

Character is not about density controls. ResCode makes no provision for density controls, and it is not considered that a policy which proposed density maximums or medium density housing saturation levels would be supported by the DPCD. ResCode has more

extensive provisions relating to amenity issues and it is likely that once these provisions become more widely implemented many amenity concerns will be reduced.

HOW DOES NEIGHBOURHOOD CHARACTER DIFFER FROM HERITAGE?

Character and heritage share many attributes, but there are important differences between the two concepts.

The basis of neighbourhood character is that every place has character, regardless of its age or appearance. However, some areas may be considered to have a more significant character than others. There are no set criteria for assessing the significance of neighbourhood character. Community feedback is an important means by which the value of character can be understood and community values are a key justification for its protection. In some areas, policies to improve or transform character may be appropriate.

While all areas have a history or heritage, actual heritage significance is determined by assessment against statutory criteria. The criteria is set out in the Burra Charter and embodied in legislation. Heritage studies designate levels of significance for sites or precincts by assessment against these criteria by way of comparison with other heritage places.

As previously noted, character studies principally evaluate the interplay of built form, vegetation and topographical qualities, with reference to the style and age of buildings where relevant. Heritage studies evaluate cultural heritage significance. This may include some reference to built form, vegetation and topographical qualities. However, it is more concerned with understanding how a particular place represents the history and evolution of an area and the people who have lived there or activities that have taken place.

3.2 CHARACTER PRINCIPLES

The following principles of neighbourhood character were prepared by a former Department of Infrastructure working party into neighbourhood character that met in late 1999. They were included in the Draft Practice Note on Neighbourhood Character published in June 2000 as part of the first draft of ResCode. These form the basis of the process and content of the work undertaken by Planisphere for neighbourhood character studies. The principles are:

COMMUNITY VALUES

The values of the local community are part of determining the appropriate response to neighbourhood character. Planning controls that aim to protect, change or improve character must draw on professional and community views.

The community should be involved in identifying the neighbourhood character measures appropriate to their area. Professionals assist in developing and translating these ideas into techniques to manage design.

PHYSICAL FOCUS

Character, in its broadest sense, can include environmental, social and economic factors, but the planning system is concerned with managing the physical evidence of character and related social impacts.

The planning system is primarily focussed on achieving a wide range of objectives through the physical environment. Character is not concerned only with the private domain, as much of neighbourhood character is manifested in the public street space. However, some character issues are related to social outcomes or impacts. For example, the height of front fences is a town planning issue with character implications that may be physical (does a high fence contribute positively to the 'look' of the area?) and social (how do high fences affect social interaction?).

SPECIAL QUALITIES OF AN AREA

All areas have a character that can be described, evaluated and, in many cases, improved. In some areas protection of particular qualities may be warranted.

The aim in placing greater priority on character is to improve the quality of the environment throughout Victoria's residential areas. For this reason, neighbourhood character is equally relevant everywhere. Planning controls should aim to protect identified distinctive and valued elements.

INTERACTION BETWEEN ELEMENTS OF CHARACTER

Character is about the interrelationships between various elements of an area, and so cannot be described or evaluated by considering individual elements in isolation.

Design responses need to consider the whole picture of a neighbourhood, rather than focussing upon one or two elements of the building form or siting.

NEIGHBOURHOOD CHARACTER AND OTHER PLANNING POLICIES

State and Council policies provide the rationale for decisions about whether to protect, change or improve the neighbourhood character of an area. Area-specific controls should be developed in the light of these strategic directions.

A Council's Municipal Strategic Statement will provide guidance about priorities in any particular area. Local housing issues and other State planning policy directions such as focusing higher density development around activity centres will be important considerations.

PREFERRED CHARACTER

Neighbourhood character descriptions and evaluations should focus on the preferred character of an area.

Descriptions of existing characteristics are an important part of the process of identifying the 'starting point', but the desired character

needs to be evaluated and considered in the context of other policy priorities. It may be that some areas should be encouraged to develop a new character, just as there may be some areas where critical elements need to be protected or reflected in all new development. The concept of preferred character is discussed in detail in Section 4.

NEIGHBOURHOOD CHARACTER TYPOLOGIES

There are a limited number of consistent precinct types that can be defined, and frequently appropriate policy responses can be formulated without the need for expensive studies.

The 'Responding to Neighbourhood Character' ResCode Practice Note has adopted this approach in presenting possible policy responses to three typical residential character types. This is not to say that detailed analysis can be completely avoided, but much can be gained from shared understandings. Many councils have undertaken very detailed character studies and this information may supplement the examples provided.

SITE ANALYSIS

A site analysis, specifically from the neighbourhood character perspective, is necessary whether or not a detailed character study has been undertaken.

A site analysis is necessary to identify characteristics that might be unusual or particular to the locality. This may not prescribe the answer, but inform the decision. A site analysis should be undertaken as part of the development assessment process. This is discussed in detail in the Implementation section.

CHARACTER AND HERITAGE

Character and heritage share many attributes, but there are important differences between the two concepts. Community values are a key justification for the protection of neighbourhood character. Policies to transform character may be appropriate in some areas.

Character studies evaluate the interplay of built form, vegetation and topographical qualities, with reference to styles and ages where relevant, whereas heritage studies evaluate cultural heritage significance, with some reference to built form, vegetation and topographical qualities. Heritage studies designate levels of significance for sites or precincts by assessment against established criteria and by way of comparison with other heritage places. The basis of neighbourhood character is that every place has character regardless of its age or appearance and community feedback is an important means by which the value of this character can be understood.

CHARACTER AND AMENITY

The difference between neighbourhood character and amenity must be recognised.

Character and amenity are terms often used interchangeably, but issues of immediate impacts on adjoining properties like visual and acoustic privacy and overshadowing should continue to be treated as issues separate to neighbourhood character.

3.3 CHARACTER TYPES

FOUR NEIGHBOURHOOD CHARACTER TYPES OF VICTORIA

Neighbourhood character is a fundamental of sense of place in residential communities. While many councils have undertaken neighbourhood character studies, little or no attempt has been made to generalise the findings of these studies into a typology of neighbourhood character types. Broadly speaking, the following neighbourhood character types have been identified across Victoria:

TABLE 1 VICTORIAN NEIGHBOURHOOD CHARACTER TYPES

BUILT FORM / LANDSCAPE RELATIONSHIP	CHARACTER TYPE
Built form dominated residential areas	'Inner Urban'
Spacious residential areas in a garden setting (formal street pattern, generally modified grid)	'Garden Suburban'
Spacious residential areas in a garden setting (informal, generally curving street pattern with courts/cul-de-sacs)	'Garden Court'
Landscape dominated residential areas	'Bush Suburban'

These four broad categories illustrate the four main types of residential areas that exist in Victoria, from an urban design perspective. The differentiation between these types is not based on architectural style or era of development. It is founded on the layout and form of the areas, and the way that the built form interacts with and relates to the landscape. These factors should be the basis for the application of neighbourhood character policies. Neighbourhood character is not about the imposition of design styles. Rather it should be about recognising the distinctive characteristics of different urban forms, and their relationship to topography and vegetation. Getting this right is the best way of maintaining and enhancing the sense of place of the state's residential areas.

An initial version of these character types, prepared by Planisphere, was included in the Draft Practice Note on Neighbourhood Character published in June 2000 as part of the first draft of ResCode. Although this Practice Note has since been superseded, it provided some useful principles about the nature of neighbourhood character. The upgraded version of the character types shown here is included in *Sense of Place: urban design principles for the Metropolitan Strategy*, a technical report on urban design prepared by Planisphere and published in October 2002 as part of the Metropolitan Strategy.

Within each of these four main character types, there can be wide variations. They are important in differentiating the character of one neighbourhood from another, and in creating or strengthening a sense of place. These variations are identified through the character survey, and are highlighted in the "Precinct Descriptions" of each Precinct Profile (refer to Appendices).

LOCAL NEIGHBOURHOOD CHARACTER TYPES

The following distinct character types were identified for Moonee Valley:

TABLE 2 MOONEE VALLEY NEIGHBOURHOOD CHARACTER TYPES

BUILT FORM / LANDSCAPE RELATIONSHIP	CHARACTER TYPE
Architecturally diverse areas within activity centre boundaries.	Central Residential
Built form dominated residential areas with generally traditional streetscapes, and modest lot sizes.	Inner Urban
Built form dominated residential areas with contemporary streetscapes.	Urban Contemporary
Spacious residential areas in a garden setting (formal street pattern, generally modified grid)	Garden Suburban

Spacious residential areas in a garden setting Garden Court
(informal, generally curving street pattern with
courts/cul-de-sacs)

These areas were defined through the interactions between the built form, street patterns and the surrounding landscape. These features were found to heavily contribute towards the valued character and nature of each precinct.

AREAS WITH NEW AND CHANGING CHARACTER

Some areas are subject to redevelopment, or have aspects of their character that are a cause of strong concern by local people, warranting change to the physical fabric. In both these instances, the appropriate planning strategy may well be to try to improve the character of the area by changing it. Achieving a measured and consistent change in the new development character of an area requires a sound approach to planning. Definition of the new character will often require urban design skills, and the process of managing change may require a sophisticated program with community involvement.

Areas yet to be developed should be allowed to create a new character within broader parameters, such as relating to the built character of adjoining areas and expressing the underlying landscape character.

CHARACTER TYPES

INNER URBAN

Built form dominated residential areas. Examples: Melbourne's inner suburbs (eg. Carlton, Fitzroy, Port Melbourne, Williamstown)

This intensive form of subdivision, much of it into small, narrow blocks, resulted in a built form dominated character. This type of character is widespread in Melbourne's inner suburbs, but unusual outside Melbourne, except in the centre of some older regional

centres and country towns such as Bendigo and surrounding settlements. Some of these areas were subject to a planned approach, with formal street layouts and a more effective control of land release subdivision. Others grew more haphazardly, with streets of varying width, including many very narrow streets, often without connectivity, and no provision for parks and squares.

Our view of the inner suburbs of Melbourne and regional centres as living environments has been transformed in the last forty years. Originally the focus of slum clearance policies, they have since become desirable residential locations, valued for the urban lifestyle and heritage qualities. Urban designers see them as exemplars of a more sustainable urban form.

TABLE 3 INNER URBAN CHARACTER TYPE SUMMARY

DESCRIPTION	MAIN CHARACTERISTICS	PRINCIPLES
Dense, low rise residential mixed use areas serviced by strip centres.	Highly urban character with buildings dominating the street scene.	Continue to conserve the heritage areas.
Largely intact Victorian colonial suburbs of high heritage value (probably world significance) associated with the rise of Marvellous Melbourne.	Low rise scaled, narrow fronted rhythm.	Maintain and enhance the hard urban character, with its solid, fine-grain streetscape 'walls', dense, connected street and laneway networks, minimal setbacks, and pedestrian friendly environment.
A walking, horse-drawn carriage and tram-based city.	Small front setbacks, small or zero side setbacks, create unbroken 'walls' to the street.	
In outer areas, land sometimes remained undeveloped for decades, leading to mixed eras of	Front property boundary always expressed by a fence.	
	Possibility of siting new, more intense development so that it is 'hidden' from view.	
	Fine-grained, connected street and laneway pattern, highly conducive to walking and cycling.	
	Served by relatively dense	

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DESCRIPTION	MAIN CHARACTERISTICS	PRINCIPLES
development (eg. Northcote)	network of strip activity centres and public transport services. Many areas of mixed use.	

GARDEN SUBURBAN

Spacious residential areas in a garden setting (formal street pattern, generally modified grid). Examples: the Melbourne middle suburbs (eg. Camberwell, Essendon, Sunshine).

The middle suburbs of Melbourne are possibly what most people have in mind when they talk about Melbourne's comfortable 'liveability', and compare its suburbs favourably as living environments with the affordable equivalents in Sydney. The middle suburbs became the crucible of the protests relating to urban consolidation, the Good Design Guide and neighbourhood character in the 1990s. Outside Melbourne, most urban residential areas have the spacious 'garden suburban' character, because densities and site coverage tend to be lower than equivalent metropolitan areas.

Most garden suburban residential areas are laid out within a north-south, east-west grid of one chain (20m) main roads (more likely to be 30m in regional Victoria). Mostly the street pattern is grid-based or grid-adapted. The roads are tree-lined avenues, often with concrete kerbs and footpaths, and grassed nature strips. Some housing has low walls fronting formal, trimmed gardens that are open to the street, and houses are located within the lot, rather than extending to its boundaries. The atmosphere of a garden suburb is one of space and trees, though the separation of private and public land is clearly defined.

TABLE 4 GARDEN SUBURBAN CHARACTER TYPE SUMMARY

DESCRIPTION	MAIN CHARACTERISTICS	PRINCIPLES
Train and tram based.	Spacious feel: space around and between buildings, open	Use a formal approach to street

DESCRIPTION	MAIN CHARACTERISTICS	PRINCIPLES
Late Victorian to 1960s / 70s.	rather than enclosed street space, large setbacks	space design (eg regular avenues of trees, regular geometry of kerbing and traffic management devices)
Grid-based street pattern.	Green and leafy appearance in many areas	Retain the spacious, green and leafy character, including views of backdrop vegetation between and over buildings, generous front garden setbacks open to view from the street, and grassed nature strip with minimal interruption
Spacious streets and gardens.	Low scale, dominant roof forms, strong horizontal emphasis	Maintain the horizontal emphasis of massing and form resulting from the dominance of the roof form
Detached houses, double or triple fronted.	Gaps between buildings	
Footpaths and nature strips and tree avenues (often exotic).	Front property boundary usually defined by low, solid fence or moderate height 'transparent' fence (eg wire mesh)	
Car storage		

GARDEN COURT

Spacious residential areas in a garden setting (informal, generally curving street pattern with courts/cul-de-sacs). Examples: Melbourne outer suburbs such as Chirnside Park, Wantirna, Carrum Downs.

From the 1960s to present time, garden court residential areas have emerged. They grew faster in the north-east, east and south-east than in the north, north-west and west Melbourne. These suburbs have grown on the fringes of Melbourne and other centres, where initially infrastructure and services were inadequate.

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The term Garden Court refers to the combination of a Garden Suburban type of development superimposed on a pattern of curvilinear streets with cul-de-sacs or courts. This layout was designed to accommodate full car-based access as safely as possible, by eliminating 'rat runs' and providing low speed, low volume traffic environments within the courts. A negative consequence of this type of layout has been the poor connectivity of the street system for bus routes and walking.

These areas tend to be associated with car-based, stand alone retail centres. In seeking to create more sustainable urban environments, government policy will need to address these deficiencies over the long term.

The curvilinear street pattern results in the creation of informal street spaces which are often complimented by informal (often native) garden planting. There is often only one footpath, sometimes none at all.

More recent trends in Garden Court areas have seen reduced setback and road width standards, coupled with substantially increasing site coverage. Many estates of the 1990s include large numbers of two storey houses with much reduced setbacks. These changes have reduced the 'garden' aspect of the character, increasing the sense that the street is lined by a solid 'wall' of buildings. Although street and garden trees will eventually mature and 'soften' these streetscapes, they will continue to have a more built-form dominated character.

TABLE 5 GARDEN COURT CHARACTER TYPE SUMMARY

DESCRIPTION	MAIN CHARACTERISTICS	PRINCIPLES
Car-based 1960s/70s onwards	Pre-1990s: spacious feel – space around and between buildings, open rather than enclosed street space, large setbacks	Use an informal approach to street space design (eg informal groupings of trees, irregular geometry of kerbing and traffic
Curvilinear plus court-based street pattern		
Spacious streets and	From the 1990s: a more enclosed feel due to smaller	

DESCRIPTION	MAIN CHARACTERISTICS	PRINCIPLES
gardens	setbacks, higher site coverage and two storey development	management devices)
Detached houses, double or triple fronted	Green and leafy appearance in many areas	Retain the spacious, green and leafy character, including views of backdrop vegetation between and over buildings, generous front garden setbacks open to view from the street, and grassed nature strip with minimal interruption
Two storey houses and higher site coverage common from 1990s	Low scale and horizontal emphasis of dominant roofs (pre-1990s)	In pre-1990s areas, maintain the horizontal emphasis of massing and form resulting from the dominance of the roof form
Nature strips, often without footpaths	Gaps between buildings (less from 1990s)	
Informal street tree planting, often native	Less emphasis on separate definition of public and private domain: front gardens often not fenced	
Car storage usually off-street and behind the building line (in front of the building line in some more recent estates)		
Car-based, stand alone retail centres		

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:

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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)

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Notes:

- Images captured on Fuji film X-T10 camera with XF 50mm zoom lens.
- Date: 27th April 2023 between 2.33pm and 4.27pm.
- Height of 1.65m.
- 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.

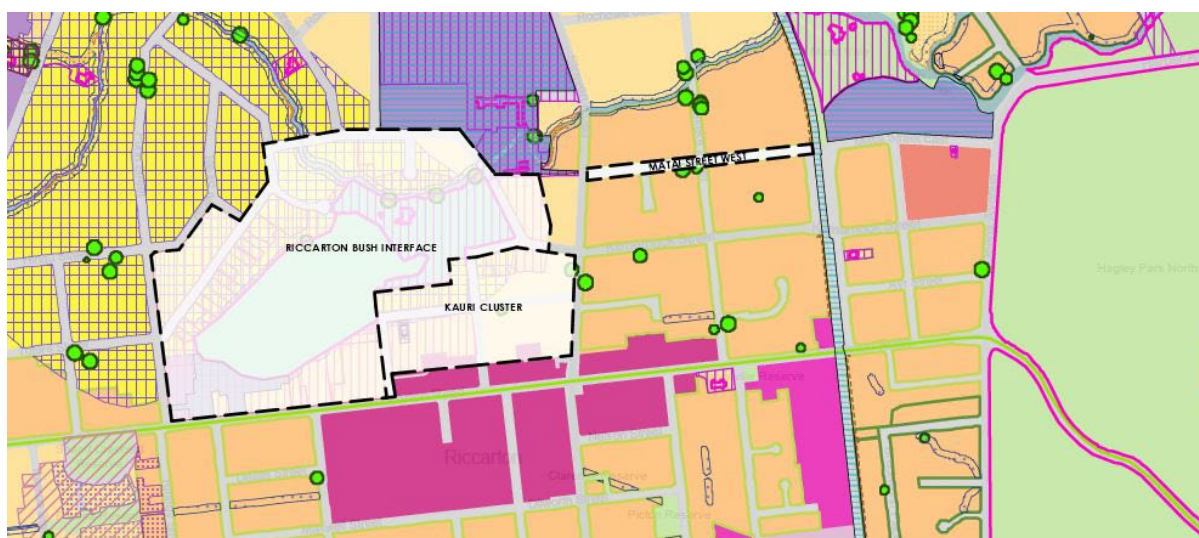


Figure 1. Map indicating areas of discussion, outlined in black. Not to scale.

A. RICCARTON BUSH INTERFACE AREA

- I. Location: 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.

Discussion: 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.

Note: 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. **Location:** 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.

Discussion: 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.

Recommendation: 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. **Location:** 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.

Discussion: 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.

FOR THE CHRISTCHURCH DISTRICT PLAN INDEPENDENT HEARINGS PANEL

Regarding Proposed Plan Change 14,
Housing and Business Choice

SUBMISSION from

Robert Leonard Broughton

25 Rata Street, Riccarton,

Christchurch, 8041

I wish to appear before the Independent
Hearings Panel

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INTRODUCTION

I fully support the submission from The Riccarton Bush- Kilmarnock Residents' Association (RBK) for the area in which I live.

I will add my concerns not only for the area but for the street on which I have lived for over 40 years, raised a family and actively supported the community.

I live in Rata Street on the southern side of the street opposite Riccarton Bush/House and grounds.

The current zoning is **Residential Suburban** and I submit that this **should remain** and **not** be changed to Medium Density in any form.

I will argue that the area known as the Kauri Cluster retain the current zoning.

I submit that the fact that over 20 Residents Associations from across Christchurch representing residents from all groups and areas should surely signify a massive revolt against **the one size fits all** policies (BespokePlanproposal20220921) of the Government and that the Christchurch City Council (CCC) should continue to stand for the City of Christchurch and its residents. The CCC stand is summed up in the attached article. (GregPartridgearticle1March23).

I point out that the CCC objected to the excessive nature of the legislation in a lengthy submission (Letter from Mayor Leanne Dalziel) and furthermore our local MPs once demanded the CCC do something about the type of developments being allowed in the City.

Our local MPs stood as stated in the article from the Christchurch Press,
MPs urge tighter house-building rules to protect neighbourhoods
 Dominic Harris and Michael Hayward:18, Mar 01 2019

“Addressing councillors on Thursday, Webb and Dyson said that while well-managed intensification was good for the city, too many developments had "significant shortcomings".
 In a submission to the council – backed by Christchurch East MP Poto Williams and Te Tai Tonga Maori electorate member Rino Tirikatene – Webb said poor planning around intensification of housing **could damage "liveability" and harm the character of neighbourhoods."**

These concerns are very much in line with the views of the residents of Christchurch.

The concern is not against intensification as such but against the excessive and over-intensification being imposed on Christchurch by poorly thought through policies. Isn't it enough that areas of Christchurch have already suffered under the CCC planners allowing unbalanced, chaotic and over densified development of sections way above even the current plan.

The CCC has prepared strategies for Christchurch that are being trampled on by the Government legislation.

For example:

Christchurch City Council Community Strategy.

“Enabling active and connected communities to own their futures”

Ōtautahi - Christchurch Climate Resilience Strategy

I aim to link these strategies alongside what they involve for my area in particular but which apply across the city as well.

Unfortunately the totally aspirational plans espoused in the CCC document:

Planning for our growing city; ccc.govt.nz/growingcity

together with the Urban Growth Programme

(Huihui Mai Greater Christchurch – let’s come together to plan our future)

seem to ignore reality and actual facts and actually contradict the above strategies.

1-FAILURE TO PROPERLY ASSESS SOCIAL IMPACTS

This has been covered in the Riccarton Bush – Kilmarnock Residents' Association's (RBK) submission.

In addition I would add the following:

HEALTH AND WELLBEING INCLUDING EFFECTS OF 6-STOREY BUILDINGS

High density residential intensification needs to be where it is most appropriate, in the CBD and, to a lesser extent inside the four avenues. Again, communities should be consulted before recommendations for intensification are made, to ensure such intensification occurs where communities are willing and welcoming

Multi-storey residential developments in the suburbs are dehumanizing and unhealthy. They separate people from each other and the outside environment. They greatly reduce socialisation in communities including the number of encounters on the street or over the back fence.

The effects of multi-storey residential developments on mental health have been researched and documented. They keep children and the elderly from getting exercise. They encourage people to stay at home and flick on the TV, depriving residents (especially children) of physical play and peer activity.

We can look forward to big boxes with little outdoor space. At 1 metre from the boundary, dwellings can be 2 storeys, and further into the site up to 3 storeys, (11m plus 1m for a pitched roof).

A cost-benefit analysis carried out by PwC for the Government puts a price tag on changes to sunlight and views under the housing intensification bill, which allows new homes of three-storeys to be built almost up to the fence-line. Many planners are panning it.

A pricing tool called Icarus invented by the Sense Partners of Wellington has been used for the first time to put a price on the impact of more shade and less view. The lower combined estimated cost is \$650 million nationwide, and the higher is \$1.3 billion, with the price of lost sun slightly higher than for lost views.

This represents tens of thousands of dollars lost from the market value of each house affected. However, the impact on people's lives from the lack of sunshine is even worse. It is described as an impending "disaster."

In terms of **well-being**, a term beloved by this Government, there is plenty of discussion on the site Smart Cities Dive.

So it is pertinent to ask "**what is meant by Liveability?**"

Liveability describes the frame conditions of a decent life for all inhabitants of cities, regions and communities including their physical and mental wellbeing. Liveability is based on the principle of sustainability and smart and thus is sensitive to nature and the protection of its resource. The special focus to improve Liveability is to take all dimensions that are relevant to Liveability into account: the physical, the social and the cultural. We start from our global perspective but are most sensitive about the specifics and characteristics of the local situation. **A local approach is crucial for Liveability.**

This ill-conceived, poorly drafted Government plan simply does not address this at all. In fact it is the antithesis of the concept of liveability.

Research from overseas, along with trends observed in New Zealand, indicate a change in peoples attitude to living as a result of the age of Covid. It has been very evident that highly intensified cities are simply incubators for the spread of a virus. Covid is not done yet and scientists have said the human race will be faced with future pandemics especially if the jungles are continued to be encroached on. One only has to look at New York and Auckland for example to see what overcrowding does. As a result there is a world-wide movement to move out of cities for a healthier lifestyle. Working from home has become the norm so people are saying "why not work from a healthier, less expensive environment with no commuting hassles." (Smart Cities Dive articles). So why force excessive over-intensification on Christchurch and on the Riccarton Bush – Kilmarnock Residents' Association (RBK) in particular.

Below are **7 reasons why high-rises kill liveability:**

7 Reasons Why High-Rises Kill Livability | Smart Cities Dive
<https://www.smartcitiesdive.com/ex/sustainablecitiescollective/7-reason...>

1. High-rises separate people from the street

According to Gehl, a city is best viewed at eye-level. Sure the views from a high-rise can be stunning, but you aren't able to see people in a way that allows for connection. Because it's not as easy as walking out your front door, people who live on the high floors of a high-rise are less likely to leave their houses. This separates people from the outdoors, the city and from other people. "What high-rise does is separate large numbers of people from the street, so we end up with a city that is detached from street life, we end up with a city that is based on enclaves and gated communities," says urban planning expert Michael Buxton.

And Gehl maintains that "meaningful contact with ground level events is possible only from the first few floors in a multi-story building. Between the third and fourth floor, a marked decrease in the ability to have contact with the ground level can be observed. Another threshold exists between the fifth and sixth floors. Anything and anyone above the fifth floor is definitely out of touch with ground level events."

2. High-rise scale is not the human scale

When you walk through a high-rise neighbourhood, you lose sight of the human-scale in high-rise neighbourhoods.
 600x90 horizontal banner

3. High-rises radically reduce chance encounters and propinquity

Because high-rises tend to separate people from the street and each other, they greatly reduce the number of chance encounters that happen, which are crucial to the liveliness of a city and to creating social capital. And because people are cooped up in tall buildings, they are less likely to experience propinquity, a concept introduced to me by architect and urban designer, Kevin Kellogg. Propinquity is "one of the main factors leading to interpersonal attraction. It refers to the physical or psychological proximity between people. Propinquity can mean physical proximity, a kinship between people, or a similarity in nature between things," according to Wikipedia. Propinquity happens in public spaces – on the street, in parks, public transportation and city squares. High-rises

diminish people's participation in public spaces and therefore diminish propinquity.

Living in a high-rise creates a very finite and encapsulated world in and of itself. The high-rise becomes your world, especially those which include a restaurant, market, gym and other amenities. You never have to go outside or encounter other people. Plus, this phenomenon creates the opposite effect of public spaces. It ensures that people mostly interface with others of the same socioeconomic strata. High-rises literally create silos, both physical, social and psychological.

4. High-rises are vertical sprawl

How could high-rises possibly be sprawl as they take up so little actual land? Sprawl is when something is built inefficiently and takes up too much space. With high-rises, they take up too much vertical space for something (in this case dense housing) that could be achieved with much less height.

isolation and is often devoid of people on the streets, high-rises offer up the same problems, but just from a vertical perspective. Plus, not unlike the vast swaths of suburban tract homes that are built during an economic bubble that often end up empty, high-rise bubbles can be just as unrealistic.

5. High-rises=gentrification and inequality; Low/Mid-rises=resiliency and affordability

According to Suzanne H. Crowhurst Lennard, co-founder and director of the Making Cities Liveable International Council, "the construction industry is a powerful engine for fueling economic development. Tall buildings offer increased profits for developers. However, the higher a building rises, the more expensive is the construction. Thus, the tallest buildings tend to be luxury units, often for global investors. Tall buildings inflate the price of adjacent land, thus making the protection of historic buildings and affordable housing less achievable. In this way, they increase inequality."

On the other hand, says Making Cities Liveable, "small footprint shops and apartments in a fine textured urban fabric yield smaller profits, spread out among many individuals and businesses in the community. Over centuries, this human scale urban fabric has proved to be adaptable to changing political and economic times, making the community resilient, and durable. The City of Paris, with buildings no taller than 100', supports continuous retail along the street, making every neighbourhood walkable."

6. Are High Rises Even Green?

.High-rise buildings are built largely of steel and concrete and are less sustainable than low rise and mid-rise buildings built largely of wood; steel and concrete produce a lot of GHG. Wood traps it.

Concrete is 10 times more GHG-intensive than wood.

7. High Rises are not good for your health

This assertion may sound laughable to some, but the effects of the high-rise on mental health have been researched and documented. Psychologist Daniel Cappon writes in the Canadian Journal of Public Health that high-rises keep children and the elderly from getting the exercise the extra effort it takes to get outside encourages them to stay at home and flip on the TV. High-rises, he says, also deprive people and especially children of "neighbourhood peers and activities." And he believes that the level of alienation and isolation, things that have been proven to negatively impact

health and even shorten people's lives, increase with the height of the building.

In conclusion, I'll quote Cappon at length:

"What is there to say? We must have the incontrovertible evidence and the mechanism whereby the high-rise leads to the low fall of urban humanity. Meanwhile, we must not go on blindly building these vertical coffins for the premature death of our civilization. What shall we do instead while we are wanting to learn the ultimate facts? We can satisfy the economy needs for high density per land acre, which of itself is not likely to produce ill health, while restricting height and redistributing spaces in terraced, human-scale fashion, supporting social confluence and relationships or, at least, not impeding the nurturing of precious human resources."

If one researches into the issues of intensification on sites such as "Smart Cities Dive" then one will find plenty of data. I give one such quote:

The high-rise is not the only answer to density. In fact, it may be a very unsuitable solution that undermines the character, liveability, social fabric and even the public health of a city.

My comment on the prospect of 6-storey buildings along Riccarton High Street.

Why would anybody suggest allowing 6-storey buildings along this narrow stretch of road, creating a wind tunnel effect with little sunshine resulting in a cold gloomy environment such as exists in parts of the CBD – a most uninviting environment.

So I also submit the plan change should be reviewed once a proper social impact assessment has been completed

2-SUNLIGHT PRESERVATION; SEEKING AMENDMENT TO THE QUALIFYING MATTER

I strongly support the argument made in the RBK submission for a sunlight qualifying matter putting limits on building heights, recession planes and set-backs to preserve residents' access to sunlight. Refer to the comments in ITEM 1 regarding well-being.

3-THE RICCARTON BUSH INTERFACE AREA (RBIA):SEEKING AMENDMENT TO THE QUALIFYING MATTER

There is a comprehensive coverage regarding this issue in the submission from RBK under this topic.

I am personally affected by the CCC proposal and I submit that:

the area known as the Kauri Cluster should not be reformulated into disjoint parts but remain as intended by the CCC remodelling in 2006 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.

That specifically the area remain as currently zoned: Residential Suburban. Specifically in my case that the south side of Rata Street **not** be rezoned Medium Density allowing 3 x 2-storey on sections with the added effect of excessive unrestricted on-street vehicle parking and the destruction of the beautiful Rata trees.

I submit there is nothing to be gained by changing the current zoning. Those who have moved into the south side of Rata Street and built new homes in good faith, moved families and older people into the area, and in doing so intensified the dwelling density, should not suddenly have their worlds upturned by the overturning of the decisions made by the IHP in 2015 after lengthy comprehensive deliberation.

The functionality of Riccarton Bush/House would be severely inhibited by decisions that would allow excessive long-term on-street parking. This would certainly include the successful and popular Farmers' Market held on Saturday mornings where the local streets currently provide room for clients to find parking. Covering sites with concrete would impact the significant and welcome bird life that interacts with the Riccarton Bush/House and grounds.

This is discussed further in section 9.

4-RICCARTON COMMERCIAL/RESIDENTIAL TRANSITION ZONE: A NEW QUALIFYING MATTER

I agree with the points made in the RBK submission.

In addition the proposed phalanx of high rise allowed along Riccarton Road would turn the road into a very unpleasant environment on a regular basis since it would allow for a wind tunnel effect for the prevailing Christchurch easterly winds which are strong and invariably cold. The same effect would come with the westerlies especially unpleasant when raining. A plethora of 5-6 storey buildings would also cause major issues in an earthquake event.

5-THE AIRPORT NOISE INFLUENCE ZONE: SEEKING AMENDMENT TO THE QUALIFYING MATTER

I submit that the properties on the southern side of Rata Street, should, for reason and consistency, all be included in the Airport Noise Influence Zone. Modelling is not an exact process and I fail to understand that, whilst the properties on the north side of Rata Street are in the zone, those on the south side some 20 metres away are not. Often when in my lounge at 25 Rata Street (on the south side of Rata Street) I experience substantial vibration and noise from planes flying low overhead that I have rushed outside to see if there was an issue. I can hear the noise from the testing of engines.

I thus submit that for consistency both the north and south side of Rata Street be included in the Airport Noise Influence Zone.

6-RE-EVALUATING WALKING DISTANCES & 6-STOREY ZONES

I 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.

The centre of Riccarton should be taken as the CCC Community Centre in Clarence Street.

This sits in the heart of the Riccarton centre with access in all directions to businesses.

7-ON TREES

I submit 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.

The Council says it knows trees are important to people. That they play a vital role in helping tackle climate change, reinforce our identity as the Garden City and provide a range of other essential environmental, economic, cultural and social benefits.

Comment: A great statement so why is Christchurch losing so many mature trees. Developers simply strip a site of mature trees, shrubs and plants. This is not helping climate change since it takes decades for newly planted tree to perform as well as mature trees.

Why are the City planners imposing planning rules that will see the wonderful sight of Rata trees in bloom, Kauri and Rimu trees enhancing the streets in a Council inspired development from 2008 only to be swept away by thoughtless planning that gives the power to developers who don't care.

The Council says it is working on ways – both through this plan change and also in other non-regulatory ways – to ensure that green spaces and trees can be retained as much as possible, while enabling more housing choice for our residents.

Comment: In the area around Riccarton Bush there is an abundance of green canopy which is surviving the intensification of the area. Unfortunately the draconian plans being put forward do not bode well for the future where much of this will disappear. Six storey monsters will be the new wilding pines desecrating the area. The CCC statement is simply not going to hold.

As part of this draft plan change, the Council proposes introducing Financial Contributions, which would be required from anyone developing land to help fund increasing our tree canopy cover in the city. These contributions will be used to plant trees on Council-owned land.

Comment: What a joke. Ruin an established area with ill-conceived, poorly thought out plans. What planet are you on? The Council's proposed financial contributions will do nothing to retain the notion of a garden city or the proposal for a National Park. Developers will simply continue to do what they are already doing and ride roughshod over such feeble minded proposals.

Additionally, the Council proposes that the Schedule of Significant and Other Trees currently included in our current District Plan becomes a Qualifying Matter. We will be reviewing approximately 900 trees on the list to provide the necessary evidence required under the NPS-UD to be considered as a Qualifying Matter, before the plan change is notified before 20 August 2022.

A further review of the Schedule of Significant Trees to protect additional trees could be carried out as part of any subsequent plan changes.

Comment: Good to hear but will this be carried out?

Our Tree Policy, introduced last year, outlines how we manage and maintain trees in public open spaces. We're also preparing an Urban Forest Plan that will provide a long-term vision and strategy to maximise the health and sustainability of the city's urban trees and forests. It's due to go out for community consultation later in 2022.

Comment: What about providing protection for the many mature trees on private land?

Destroy the trees and destroy the accompanying bird life – not something King Charles and David Attenborough would be happy about.

*The reality is that high density residential intensification needs to be where it is most appropriate, in the CBD and, to a lesser extent inside the four avenues. Enabling high and medium density across our entire city will eventually result in suburban slums (particularly around malls and transport hubs), **destroy mature trees and gardens**, cause our CBD to stagnate, and threaten any chance we have of retaining our garden city status or becoming a National Park City.*

Christchurch needs to look to developments overseas where the modern emphasis is on green, sustainable development including the concept of a "sponge" city.

Unless the Council can insure open green spaces in any intensification plan then any area suffering high density residential intensification will end up as slums with accompanying social problems.

8-PLAN CHANGES VERSUS CLIMATE CHANGE AND GEOSCIENCE

TREES and CLIMATE CHANGE

High density intensification in the suburbs destroys mature trees and gardens. It threatens any chance we have of retaining our garden city status or becoming a National Park City.

Housing developments should be constructed with the natural character and/or heritage of the surrounding areas in mind. The natural environment should be paramount and that means retaining established trees as integral components of new developments - rather than allowing sites to be cleared of all vegetation.

A Climate and Ecological Emergency was declared by the Christchurch City Council in May 2019, and our Government declared a Climate Emergency for New Zealand as a whole in December 2020.

Compelling international studies and research indicates that there are significant and substantial benefits in retaining and increasing tree canopy coverage in residential neighbourhoods. These include the **mental health and wellbeing** of residents, economic prosperity, and the obvious environmental benefits. Trees also strip emissions from the atmosphere, reducing storm-water run-off, and preventing urban heat islands from developing.

Christchurch has the lowest percentage of tree canopy coverage of any major city in New Zealand. There needs to be far more investment and spending to swiftly turn that around if the City Council is truly committed to battle climate change and for Christchurch to become a National Park City. That is not achieved by allowing trees to be cut down. The focus needs to be on planting more trees as well as (**not instead of**) retaining existing trees; and on all land, not just in parks owned by the Council.

Christchurch City Council along with Canterbury's nine District Councils and the Regional Council (ECan) recently launched the www.itstimecanterbury.co.nz website. The website speaks to the things many of us are well aware of:

- That trees and plants are the lungs of the planet - that they strip harmful global warming gases from the atmosphere and convert them into oxygen
- That New Zealand native trees store more carbon than exotic species and require less water to grow
- That there is a need to reverse the damage that's been done to the natural environment and the ecological systems in our city and region on both private and public land in order to reduce global warming gasses and to improve the health of habitats, waterways and ecosystems.
- That global warming and climate change is real, that it's already impacting our city, that it will bring more extreme conditions, and that it is going to impact our lives and the lives of children today and into the future

Why then is the City Council not doing more to protect the taonga of existing trees that have stood for generations breathing life into Ōtautahi Christchurch? Why not support plan changes that prevent avaricious property developers from continuing the practice of clear-felling properties of those precious trees, instead of doing the opposite with Plan Change 14?

The suggested workaround 'solution'; allowing developers to pay for the right to fell established trees has no merit. It is a solution dreamed up by an economist who figures funding the planting of six saplings on public land far away is a fair trade for the loss of a 100 year old Totara. That's not any kind of compensation. Anyone can plant new

trees. That's not the challenge. The real challenge is keeping them alive AND healthy and when it comes to following through on that, the developers are nowhere to be seen.

Are Council staff aware of the extensive overseas research on cities that shows that for a city to be sustainable the green canopy should be above 40%. This is a minimum and yet the so called garden city is already below this. A disgrace for a Council that invoked a climate emergency.

Let us look towards a green, sustainable city that is not covered in concrete. There are plenty of articles containing work on green, sustainable development and the development of "sponge" cities. The effects of climate change on Auckland and the north must surely be a wakeup to think of these issues together with the effects of excessive intensification on infrastructure.

References:

Time running out to save Christchurch's trees from housing intensification: Tina Law 05:00, Mar 05 2022

Urban greening can reduce impact of global heating in cities, finds study.

Nature-based solutions' like trees and rain gardens can be cost-effective climate adaptations, advocates say.

Fight or adapt to climate change? It's a false trade-off for cities, climate experts say

Projects that reduce planet-warming emissions and those that protect communities and infrastructure are both worth pursuing, said panelists at last week's Cities Climate Action Summit.

Published April 24, 2023 Ysabelle Kempe

GEOTECHNICAL

All our area is either TC2 or TC3, yet, in making these planning changes, there appears to have been no consideration of the geotechnical strength of land across Christchurch. This is of grave concern. It appears people in high places have short memories. Policy-makers appear to have forgotten what occurred in our city in 2010 and 2011.

Hundreds died and tens of thousands were forced to evacuate their homes because they were built on poor land with inadequate foundations. The fact there appears to have been no consideration, in making these changes, of the geotechnical strength of Christchurch land is seriously worrying, especially given the issues post-quake surrounding multi-unit and high-rise developments. Given the findings of the programme regarding the parlous state of high rise complexes across the motu why would Christchurch people trust developers to deliver safe buildings. The nearly new Statistics Department building in Wellington came within an ace of collapsing on the staff (who managed to get out safely).

Much of this city is built on a swamp (including much of the lower Riccarton area where we live) so it makes no sense to enable high rise intensification in vulnerable areas when we all know the main divide is going to rupture.

After the events it was decided Christchurch should be a **low rise city. What happened to that proposition?**

Recently published articles in the media by geoscientists suggest future earthquakes will be more intense. The Alpine fault fracture is overdue. EQC research papers state the risk level resulting from an earthquake rises with intensification. Christchurch has suffered clusters of quakes recently, a bunch of level 3s and a bunch of level 4 Friday 21 April 2023.

A 4.0 magnitude quake struck 10 km north-east of Christchurch about 2.20am. The quake came at a depth of nine kilometres, causing moderate shaking, according to GeoNet.

It was followed by a second, 3.6 magnitude quake 10 km north-east of Christchurch at 7.31am. The light earthquake came at a depth of 10 km.

A third, 4.3 magnitude quake 10 km north-east of Christchurch followed nine minutes later, at 7.37am. The moderate quake had a depth of eight kilometres.

There were around 15,764 'felt reports', most of whom reported weak to light shaking, GeoNet said

References:

National Seismic Hazard Model Te Tauira Matapae Pūmate Rū i Aotearoa

Historic Earthquakes

The Earthquake Hazard in Christchurch – A Detailed Evaluation for EQC

9-HOUSING AVAILABILITY AND AFFORDABILITY, PARKING

Higher density developments are attractive to investors who become landlords.

This is evident already in Christchurch with a number of developers moving away from targeting home-buyers to setting up schemes to encourage investor purchases. These investors then go on to become renters or they offer their properties for AirB&B. This type of process does not help solve the housing issue. Developers claim their developments are all presold. However many remain unoccupied as investors hope for the return of tourists and the opportunity to rent to them. Not helpful to the motel and hotel industry.

Also this type of development does not create communities. A greater proportion of dwellings being rented, many for short terms, creates a more itinerant population with **no social cohesion** leading to social problems including isolation and crime. Unfortunately my experience of the UK echoed by comments in a Press opinion piece would tend to support this position.

Housing developments must be **well designed and well balanced**. They need to be the right mix of owner-occupier and rentals, and in the right locations, in order to promote communities and protect the overall built character and heritage of neighbourhoods. I have no objection to the kind of high rise development in say Carlton Mill Road or Park Terrace. These areas are suitable for such development and are in the central city area. However apartments in these developments are very much in the upper price bracket.

Yes, there is a need for more affordable housing, but intensification is not necessarily the solution. The cost of building a new house (because of inflation, labour shortages, lending rules, and red tape) will never be cheaper and yet that is already more than most people can afford. No matter how much we intensify, no matter how many new houses we build, first home buyers will still struggle to afford them.

Buyers should also ask whether the box they are buying is in fact value for money.

This means the only beneficiaries of intensification will be the developers and the investors. Those that suffer will be the first home buyers and the renters.

However according to a Blackburn Management Report the market for medium density multi-unit dwellings is currently oversupplied and the number of new residential units being consented in Christchurch in 2023 will fall by 20% to 30% over the next 12 to 18 months.

PARKING

Multi-unit developments with no off-street parking are already creating parking chaos in Christchurch. With no requirement now for a developer to provide off-street parking, further intensification will result in even more roads clogged with vehicles parking illegally on grass berms, over fire hydrants, straddling footpaths and encroaching over driveways, and on private property. In narrow streets this means emergency service vehicles will not have clear access to properties, putting lives in danger. Turning streets into parking lots is a massive hindrance to the collection of rubbish.

No off-street parking also has a serious effect on crime rates in the city (witness the recent front page of The Press, Tuesday 2 May 2023). More cars are stolen from on-street locations than off-street. With less off-street parking, more cars are easy pickings for car thieves, resulting in more crime, including dangerous and illegal driving and ram raids.

While there is a push from the Government to eliminate the requirement for off street parking (in order to encourage people to cycle or use public transport) the demand for these transport options remains low. It is true more people are moving to electric vehicles, but for economic reasons. Unfortunately the infrastructure support for these is seriously underdeveloped. Where are the roadside charging stations? Are residents expected to run extension cords from their cars across footpaths into their apartments.

In fact, as housing intensification increases (more people living in smaller and smaller spaces) and until there are sustainable, viable and attractive transport alternatives, the need for parking will increase, not decrease.

The height of insanity was to allow a 20 unit development of boxes with no off-street parking on a stretch of road already heavily parked out on a permanent basis resulting in residents trying to use local business car parks.

With respect to the RBK area, increased on-street parking would have a severe impact on the area in general especially on the highly successful Farmers' Market held on Saturday mornings held in the grounds of Riccarton House. The same could be said for the many events and functions held there as well. At the moment the limited time parking and off-street parking soaks up the visiting vehicles.

I submit that the basic assumption that cars will not be needed is simply not correct. New Zealand is not one big city. There are substantial terrain issues; issues of convenience of travel; emergency issues; to name a few. Also the Government is encouraging electric vehicles (EVs). Where are these going to park (not to mention get recharged)? In fact the cheaper EVs are considered great for driving round Christchurch which is not going to encourage bus use in an inconvenient, out of date public transport system.

In terms of the RBK area, parking is already a problem and the more the area is intensified with limited off-street parking the congestion on the streets will grow.

Having the Kauri Cluster choked with parked vehicles on a continual basis is hardly conducive the well-being and general liveability of the area.

10-ESTABLISHING A PLANNED PUTAINGAMOTU-RICCARTON PRECINCT: A NEW QUALIFYING MATTER

I 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 (RBK) 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

I strongly support the argument in item 12 of the same heading in the RBK presentation.

A strong argument for this proposal is that this area is a **community, it is also a character/heritage area.**

Community

It would be difficult to ignore the effect a community has on its area. **Community values help define the character of an area.** The area given by the Riccarton Bush – Kilmarnock Residents' Association (refer its submission) to the north of Riccarton Road and including the Riccarton House and Bush, has predominantly owner occupied properties many with long standing residents. It is a diverse community of different age groups, encompassing older retired residents and families of various ages. As the CCC planners discovered at the previous attempt to change the zoning when a large number of residents attended the planning meeting in the Chateau, there is a **strong sense of community**. The anger at these current proposals was also evident at a recent meeting attended by residents of all ages. Residents know one another, stop to talk whilst walking in the area, and look out for one another. The residents are also proud of their area and look after their properties and the CCC areas such as the grass berms and planting. Indeed residents have won garden awards. Also the residents recognise the need to protect Riccarton Bush.

In contrast the area to the south of Riccarton Road is 80% itinerant rental accommodation with little cohesion. This area is a good example on how to destroy a community with poor planning and a chaotic mess of development. This is the result of planners lacking sense and indeed lacking any overall plan for balanced and cohesive development (as once voiced by MP Duncan Webb!).

This Riccarton Bush surrounding area encompasses a wide variety of buildings with old character homes (some dating from the 1920s) both single and two storey, new architect designed homes, smaller units, town houses, and revamped older homes. The materials used in construction vary from traditional wooden weatherboard to brick and modern materials. Older character homes have distinctive brick chimneys and slate roofs whilst newer homes have modern profile colour steel. Basically there is a diverse mixture of old and new, well-spaced buildings, contributing to a general positive ambience. The land occupancy varies. There are larger sections, medium sections and small sections. Infill has occurred over time replacing older buildings with multiple new buildings. However there have been new family homes built on bigger sites. The current Residential Suburban (formerly Living 1) zoning has controlled the nature of the infill thus contributing to the essential character of this area. However the density of dwellings/apartments has considerably increased over the years. The result has been so far a **balanced increase in keeping with the area.**

There has been an influx of people of all ages including families who sought to live in the area precisely for the reasons given. Yes it is close to commercial and educational facilities as well as green space. The area boasts a very useful cycle route from the University, through the Riccarton House grounds, along Matai Street, and hence through Hagley park to the city centre area. This gives access to a significant number of educational sites, heritage sites, Hagley Park, and the central city area. At least one cycleway success story that will be set back if this intensification goes through.

Character and Residential Heritage Areas.

Character arguments largely revolve around the historical significance of what was a large part of Christchurch's founding Riccarton Borough, and the remaining character gems in the area.

Our last remnant stand of swamp dwelling kahikatea, Pūtaringamotu is the Māori name for the area now known as Dean's Bush. Maori of Ngai Tūāhuriri, a sub-tribe of Ngāi Tahu, occupied the land which became part of the Deans family farm in the 1800s. The area was named Riccarton after the area the Deans came from in Scotland. Beginning in the 1880s the Deans began to sell the Riccarton property. The naming of the streets in the area was designed to showcase the Maori names of trees in keeping with the history of the area. For example Rata Street appears on a 1912 map and in street directories in 1914. One resident is listed.

The City Council went to considerable effort in 2007 (Consultation Letter April 2007) to reconstruct the streets to make the area known as the Kauri Cluster a community based area acknowledging amenity. In doing so the Council reinforced the street names by planting Kauri, Rata and Rimu trees on the newly established grass berms. These trees are now of good size and the Rata trees have been in full bloom. I would be criminal if the fine landscaping carried out was destroyed. The area is a popular community amenity for walkers, cyclists, and indeed tourists as well as home for an established Farmers' market in the grounds of Riccarton House on Saturday mornings.

The wider area is tree-filled. Home to the many varieties of birds that connect with the Bush area. It contains numerous examples of quality character pre-war housing as well as a number of significant sites including Mona Vale, Britten Stables, original Riccarton Estate farm buildings, two war memorials, Christchurch Boys High School and, of course, the iconic and unique Avon River and Riccarton House and the last remaining area of original native Bush.

There are a number of studies on Neighbourhood Character (refs: Moonee Valley Character Study 2012, City of Moonee Valley, Victoria, Australia; Higham Ferrers Neighbourhood Plan - Preserving our Past and Enhancing our Future, September 2014; Higham Ferrers, East Northamptonshire, England. (<http://www.highamferrersneighbourhoodplan.org.uk>)) are two that have drawn extensively on other studies.

Of special interest is Chapter 3 in the Moonee Valley Report, WHAT IS A NEIGHBOURHOOD CHARACTER (Appendix A). The basis of the Moonee Valley Report was the definition: **"Neighbourhood character is the qualitative interplay of built form, vegetation and topographic characteristics, in both the private and public domains that make one place different from another".**

Access to open space is often considered an essential part of an area's character

The differentiation between different types of character areas is not simply a question of architectural style or era of development and certainly not dictated by a set of absolute rules. Neighbourhood character is also founded on the siting and building form of the area, and the way that the buildings interact with and relate to the landscape. These factors should be the basis for the

application of neighbourhood character policies. Neighbourhood character is not about the imposition of design styles. Rather it should be about recognising the distinctive characteristics of different urban forms and their relationship to topography and vegetation. Getting this right is the best way of maintaining and enhancing the sense of place of the municipalities' residential areas. Neighbourhood character descriptions and evaluations should focus on the preferred character.

The City Council invited and encouraged residents in 2015 to submit the area for the newly created Category 2 Character Area. On the basis of this encouragement considerable effort was made in a comprehensive submission. This was turned down.

At each time, our community strongly disagreed with the consultant's opinion. We still do. A methodology for assessing character and heritage should be a methodology the community can agree on. Character and heritage is not about ticking boxes. It is very much in the eye of the beholder and community views should always be given considerable weight. It is time for Christchurch planners to look elsewhere in the world for what constitutes character in the 21st century and is worth maintaining for the future. Will our grandchildren ask why the old photographs show an area that no longer exists because of draconian, not to say blinkered, planning.

The draconian and poorly planned development to the south of the Westfield Mall should give the panel food for thought as to what happens when unbridled development is allowed.

Yes, RBK area needs to be designated a Qualifying Matter. Because of its significance to Christchurch, it needs protection. Riccarton is an historic part of Christchurch. The area is tree-filled. It contains numerous examples of quality character pre-war housing as well as a number of significant sites including Mona Vale, Britten Stables, original Riccarton Estate farm buildings, two war memorials, Christchurch Boys High School and, of course, the iconic and unique Avon River and Riccarton House and Bush. Leave these residential zones as they are.

11-PLANNING SHOULD BE A TRANSPARENT PROCESS PROMOTING TRUST

I submit that the people of Christchurch have been subjected to a barrage of information including misinformation in a process designed to prevent discussion.

Request after request has been dumped on residents to respond to the requirement for consultation.

Very draining especially in a pandemic,

No wonder there is a deep suspicion that responses are ignored and that CCC staff simply proceed with their interpretation of policy.

Booklet after booklet comes out swamping the people who simply give up.

For example the “aspirational” pictures in the booklet showing wide streets with barely any on-street parked vehicles represent a far cry from reality. Christchurch streets are rapidly becoming parking lots thanks to the policy of “no off-street parking required” coupled with over densification of sites. No wonder the people have revolted.

On top of that residents seeking to participate have been discouraged by the submission procedure.

We are not professionals, full-time on this but we can read and think so notice should be taken of somewhat clumsy presentations.

CLOSING STATEMENTS

The overall impression of the proposed regulations is that of policy makers operating with the left-hand not knowing what the right-hand is doing. A good example of this is the no off-street parking regulation that flies in the face of converting the population to electric vehicles supported by incentives.

The commonly quoted mantra of “walk, cycle, public transport” again assumes everybody can follow this which is patently rubbish. Most certainly one should try to reduce vehicle use by these methods. Unfortunately Christchurch does not have a particularly convenient public transport system. There is no flexibility and the approach is, as often the case in New Zealand, in need of new visionary approach based on a different type of smaller-vehicle fleet together with a flexible approach to running a public transport system I suggest those involved start doing some serious reading on alternative systems as espoused in the many articles in Smart Cities Dive.

I myself cycled for 70 years in the UK and Christchurch. I have walked around New Zealand cities, towns and countryside and also around many places overseas. I have used public transport in many cities both home and abroad. I can no longer cycle because of health issues but still walk. I feel I have done more than my bit for the climate.

Apart from that does anyone realistically expect to follow that mantra with shopping, DIY, sports (especially with young children). You need a vehicle at least sometimes.

As I said, left –hand, right-hand, simply not enough thought typical of centralised decision-making. (The MIQ ballot software as another example).

Once again rushed legislation, not notified as policy when seeking election and being pushed through under cover of the more pressing issues of dealing with the Covid pandemic. Such legislation has proved time and time again to be full of holes and ill-conceived and naïve assumptions. MP Dr Duncan Webb has headlined “kicking poor law into touch” so why is his Government so keen to introduce more?

I can only hope sanity will prevail.

I always thought New Zealand was a good example of a democratic country but it appears we are seeing the erosion of basic democratic principles in Aotearoa New Zealand. Central control is the new reality with the concept that members of parliament are elected by the people, for the people to represent their constituency and hence their area (city, town, etc) replaced by sycophantic adherence to the party line.

Those seeking local body positions should also heed the coming wrath of the people.

AND THAT IS PRECISELY WHAT HAS SUBSEQUENTLY HAPPENED. THE PEOPLE OF CHRISTCHURCH HAVE SPOKEN THROUGH RESIDENT’S GROUPS RIGHT ACROSS CHRISTCHURCH. THE COUNCIL LISTENED AND IT IS TIME THE POLITICIANS DID.

SNEAKING LEGISLATION IN HOPING NOONE NOTICES IS NOT TRANSPARENCY LET ALONE A PROPER DEMOCRATIC PROCESS

ONE SIZE DOES NOT FIT ALL – RECOGNISE THE DIVERSE NATURE OF CHRISTCHURCH. SAVE CHARACTER/HERITAGE FOR POSTERITY SO THAT FUTURE GENERATIONS CAN ENJOY AN ENVIRONMENT NOT CROWDED WITH CONCRETE, WHERE THERE IS COMMUNITY COHESION, WHERE IT IS A SAFE ENVIRONMENT FOR ALL, HUMANS, ANIMALS AND BIRDS, TO ENJOY.

I for one would hope that my grown up children can enjoy the Christchurch they grew up in as well as the new fantastic environments, a mixture of new and old. I hope that will be the same for their children and all future generations.

Signature R. Broughton Date 11/5/2023

My proposed Housing and Business Choice Plan Change (PC14) from Broughton, Robert Leonard

🔍 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

I submit the plan change should be reviewed once a proper social impact assessment has been completed. Amenity, liveability, community, well-being, should all feature as do what affects or even destroys them.

2- SUNLIGHT PRESERVATION: SEEKING AMENDMENT TO THE QUALIFYING MATTER

I submit the Sunlight Qualifying Matter should be more conservative than proposed

3- THE RICCARTON BUSH INTERFACE AREA (RBIA): SEEKING AMENDMENT TO THE QUALIFYING MATTER

I submit the **area known as the Kauri Cluster** should **not** be reformulated as existing in disjoint parts but retained as intended by the CCC remodelling in 2006 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**.

For myself this would imply the south side of Rata Street remain as currently zones – Residential Suburban

4- 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.

5- THE AIRPORT NOISE INFLUENCE ZONE: SEEKING AMENDMENT TO THE QUALIFYING MATTER

I submit that the properties on the southern side of Rata Street, should, for reason and consistency, all be included in the Airport Noise Influence Zone. Modelling is not an exact process and I fail to understand that, whilst the properties on the north side of Rata Street are in the zone, those on the south side some 20 metres away are not. Often when in my lounge at 25 Rata Street (on the south side of Rata Street) I experience substantial vibration and noise from planes flying low overhead that I have rushed outside to see if there was an issue. I can hear the noise from the testing of engines.

I thus submit that for consistency both the north and south side of Rata Street be included in the Airport Noise Influence Zone.

6- RE-EVALUATING WALKING DISTANCES & 6-STOREY ZONES

I 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. The centre of Riccarton should be taken as the CCC Community Centre in Clarence Street.

This sits in the heart of the Riccarton centre with access in all directions to businesses.

7- ON TREES -

Protections for mature trees is essential 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.

8- PLAN CHANGES VERSUS CLIMATE CHANGE AND GEOSCIENCE

I submit that any plan changes under PC14 be subject to the over-riding strategies that the Council has put in place.

That account be taken of international moves to green, sustainable cities able to cope with extreme weather conditions. That account be taken of the geoscience pertaining to Christchurch.

9- HOUSING AVAILABILITY AND AFFORDABILITY, PARKING

Do not embark on over-intensification that will destroy functioning, liveable communities. Already have so many multi-unit blocks with empty units so why impose more on areas that don not require more than the current level of densification. Sort the parking out – it is currently turning Christchurch streets into parking lots to the benefit of those developers seeking to maximise profit.

10- ESTABLISHING A PLANNED PUTARINGAMOTU-RICCARTON PRECINCT: A NEW QUALIFYING MATTER

I 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.

This is a priority to preserve a character area of Christchurch for the future. Do not destroy what should be looked upon in the future as a slice of original and historical Christchurch

11-CCC PLANNING SHOULD BE A TRANSPARENT PROCESS PROMOTING TRUST

I submit that the people of Christchurch have been subjected to a barrage of information including misinformation in a process designed to prevent discussion. Request after request has been dumped on residents to respond to the requirement for consultation. Very draining especially in a pandemic,

CLOSING STATEMENTS

APPENDICES

LARGE CHARACTER HOMES – APPENDIX 5



NEWER HOMES



(Typically newer homes are large, fitting in with the design of older homes)

Television April 16, 2021

A Living Hell: Apartment Disasters exposes the dire state of housing in Aotearoa

[By Jacqueline Paul](#)

Guest writer

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In this investigative documentary, John Gray and Roger Levie uncover the shocking truth about the dangerous state of many apartment buildings in New Zealand. (Photo: Sky)

Looking to buy a unit or apartment? You might need to think twice or even three times, if this Prime documentary is anything to go by, writes Jacqueline Paul.

If you are hoping to buy a home built between the late 1980s and the mid-2000s, there is a significant risk that it may be a leaky building. A Living Hell: Apartment Disasters spills the tea on who is responsible for designing and building such shitty housing in Aotearoa (spoilers: it's a *lot* of companies). If it achieves anything, it'll hopefully make you think twice

before putting your money down, whether for a standalone house or an apartment. As leaky apartment owner Olivia Goudie remarks ruefully at the end of the programme: “Personally, I would never buy an apartment or unit ever again.”

A Living Hell: Apartment Disasters, which aired on Prime this week and is available to watch [on demand](#), investigates the dire state of many apartment complexes across New Zealand. This is a show that many aspiring and first home buyers would do well to watch. Though, be warned, if buying during a housing crisis already has you anxious you’ll have even more sleepless nights after watching this.

New Zealand is one of the most unaffordable housing markets in the world, and [REINZ reported](#) in March 2021 that the median house price in New Zealand reached \$780,000. The [Demographia International Housing Affordability 2021 survey](#) recognised that New Zealand housing affordability has deteriorated significantly, with the cost of a median house now seven times the median income – compared to Australia at six and the United States at four. New Zealand incomes remain low, and house prices will continue to rise.

But do you actually know what you are buying? Don’t be fooled by the sky-high costs. Wait till you see the quality of builds in A Living Hell: Apartment Disasters.



One of the buildings that is put under the microscope in Living Hell. (Photo: Sky)

One of the leaky buildings featured is the St Luke's Garden Apartments in Auckland. The sprawling 285 unit complex was built between 2003 and 2011, making it a relatively new building to be affected by weather-tightness issues. The problems facing residents there are vast. Bevan Tse bought an apartment there in 2013; by the time he realised his mistake it was too late. He and his family have gone into debt to cover their share of the costs of remediation, estimated to be in excess of \$100 million.

In Wellington, the Sirocco apartments are in a similar shape. Systemic issues and leaky problems are projected to result in a repair bill of \$26 million, and many owners have sold at a considerable loss. The effects aren't just financial, but emotionally scarring too; bodycorp chair Sudhir Motwani notes that he's been racially abused multiple times as he tries to find a solution to the massive challenge all Sirocco apartment owners face.

The documentary has two key takeaways. The first is the severe issues with monitoring and regulatory standards of construction in New Zealand. If construction, regulatory and monitoring issues are not addressed, there will be further challenges in the housing system. Given the ongoing shift towards denser cities and the increase of people living in urban centres, this is an urgent problem to fix. We need structurally sound, good quality medium to high-density apartments in urban centres instead of sprawling cities and standalone dwellings.

The second is the legal framework and governance matters of apartment complexes. It's likely that many people still do not know what they are buying when it comes to apartment buildings. When you buy a unit title to an apartment, you usually become a member of the body corporate, consisting of all that building's owners. Many owners don't understand the complex nature of governance and management of apartment complexes, nor the likelihood that the bodycorp relationship can become antagonistic and dysfunctional.

At the Sirocco apartments, the body corporate fee for a recently sold apartment is \$7,950.51 per year. But where should this money go, and who is entitled to a share? As one former Sirocco owner recalls in the documentary, a dispute broke out between apartment owners with balconies and some of those whose apartments were balcony-free: those without them complained they shouldn't have to pay for damage to balconies they did not own. The problems with the owner/bodycorp relationship go far beyond the leaky building issue, and that's something Nicola Willis' [Unit Titles \(Strengthening Body Corporate Governance and Other Matters\) Amendment Bill](#) is trying to address. [Submissions are open until 29 April](#) and I strongly encourage you to submit if you are experiencing significant issues with your body corporate.

One issue I have with A Living Hell is that it approaches the issue from a very Pākehā perspective, engaging in the typical dialogue that housing is primarily investment asset. It would have been great to include a broader range of experiences from young people and larger families of ethnic backgrounds to shine a light on other living dynamics in apartments. The rhetoric around the housing crisis continues to be dominated by economic and political concerns and it would be valuable if the documentary had explored cultural inequities such as dwelling types and health and wellbeing impacts.

You'll come away from A Living Hell: Apartment Disasters better informed about the leaky building issue, but it may not provide you with the security you hoped for. As long as developers and builders are focused on profit more than people, you'll need to do your

research and seek further expertise before buying any home. Do your due diligence. My advice: don't buy into the hype and make sure you know what you are buying, warts and all.

A Living Hell: Housing Disasters is available to watch on SkyGo and PrimeTV [here](#).

Jacqueline Paul is a researcher at Ngā Wai a Te Tūi Māori and Indigenous Research Centre, and lecturer at the School of Architecture in Landscape Architecture at Unitec Institute of Technology. She is currently based in the United Kingdom to pursue a Master of Philosophy in Planning, Growth and Regeneration in the Department of Land Economy at the University of Cambridge.

The Spinoff's television section is brought to you by Panasonic.

A LIVING HELL: APARTMENT DISASTERS

It was heartbreaking to see this documentary in its entirety last night; the human cost of systemic failure in just one troubled sector of the Building Industry was laid out for us all to see.

People whose lives have been wrecked by their 'lifetime investments' being leaky and structurally unsound 'lemons'! In some cases these are people who have moved to NZ from untenable situations in their home countries; have worked hard to find employment and settle their families somewhere 'safe' and become contributing members of NZ society. In other cases these apartments were investments for people approaching retirement; a way to support themselves in old age. For others, NZ residents making their first home purchase. Yet another group being the high-end purchaser who discovers their million dollar apartments are practically worthless.

No story is a good one.

CLIMATE

Green infrastructure helps cities with climate change. So why isn't there more of it?

April 15, 2022 5:05 AM ET

Heard on [All Things Considered](#)

[LAUREN SOMMER](#)



Climate change has already made storms more intense, flooding cities with more rainfall than they were built to handle.

Josh Edelson/AP

Federal agencies are beginning to hand out billions of dollars in infrastructure spending, the largest investment ever made in the country's water system. Much of it will go to improving pipes, drains and stormwater systems. But some scientists and urban planners are pushing to fund projects that are better adapted to the changing climate.

Instead of just gray infrastructure, supporters say the answer is green.

Green infrastructure, whether it's large rain gardens or plants along a street median, has the same purpose as big storm sewers: to manage large amounts of water that can build up during heavy rains. Plants and soil absorb and slow runoff from rainstorms, while a stormwater drain captures water that runs down a street gutter and diverts it underground into pipes.

On a hotter planet, storms are getting more intense, and rainfall is often heavier. Flooding is on the rise in many cities. Stormwater systems are being increasingly overwhelmed by extreme rainfall. In the Northeast, the heaviest storms [produce 55% more rain today](#) compared to 1958. Last year, dozens of people drowned there when the remnants of [Hurricane Ida flooded basements, streets and cars](#).

Sponsor Message

Still, most cities face major backlogs in maintaining the aging gray infrastructure they already have, amounting to billions of dollars nationwide. In the rush to secure federal funding to fill that void, some worry that green infrastructure will be left by the wayside.

"What good is a pristine road that's flooded?" says Marccus Hendricks, assistant professor of urban studies and planning at the University of Maryland. "Elevating the priority of green infrastructure and stormwater systems is critical."

How rain gardens help stormwater systems in storms

Downtown Oakland, like a lot of major cities, is mostly a hardscape of concrete. Still, on one block, the sidewalk is lined with a long strip of native California plants.

"I feel so great looking at this," says Joshua Bradt, a project manager for the San Francisco Estuary Partnership. "I love that the plants are alive. They seem to be thriving."

Bradt helped bring this rain garden to life, part of a [\\$4 million dollar project](#) to add green infrastructure to a major thoroughfare in the east San Francisco Bay Area.

When rain storms hit, the water is funneled into the rain garden from the street and sidewalk. As it soaks into the soil, it prevents that water from rushing to the stormwater drain on the corner.

In big storms, that alleviates the pressure on the stormwater system, since those drains and pipes can only handle so much water at once based on their size. When storm drains are overwhelmed, water pools in the street and can inundate buildings.

Bradt says even small rain gardens can make a difference in slowing the runoff that causes flooding. They also have the added benefit of filtering runoff to improve water quality.



Joshua Bradt looks over a green infrastructure in downtown Oakland. During storms, water from the street and sidewalk is funneled into the rain garden.

Lauren Sommer/NPR

Cities struggle to get green infrastructure built

Green infrastructure can also help when it's not raining. [Summer heat waves are often more dangerous in cities](#), because concrete absorbs and radiates heat in what's known as the "urban heat island" effect. Plants and parks can provide much needed cooling.

"If they were on every corner, it would make a tremendous difference," Bradt says. "The reality is that a lot of city departments are already overwhelmed, and this is a hard ask."

While both gray and green infrastructure require upfront funding for construction, green infrastructure also requires ongoing maintenance to keep the plants healthy and clean up litter. Even if cities can secure funds to build the projects, maintenance generally isn't included. They face adding that to their annual budget, which can turn out to be a hurdle for doing green infrastructure.

In addition, the most cost-effective time to build green infrastructure projects is when cities are already doing road or construction work. But because the projects are often managed by different departments, coordination doesn't happen.

"It's becoming more standardized and definitely more accepted," Bradt says. "However, I will say there just is not yet a mass movement towards this, because of how institutionalized and siloed infrastructure management and investment is."



A utility hole cover bubbles open in a road flooded by the remnants of Hurricane Ida. Across the U.S., millions of miles of pipes and stormwater infrastructure stretch below city streets. Most are decades-old, designed for the storms of last century.

Ted Shaffrey/AP

Bigger storms are already overwhelming cities

Whether cities spend on gray or green infrastructure, a hotter climate is adding huge costs to their budgets.

"Our challenge with climate change is that we're seeing these big events," says Lauren McPhillips, a water engineering professor at Penn State University. "We're seeing massive amounts of water that we need to be able to control."

Across the U.S., millions of miles of pipes and stormwater infrastructure stretch below city streets. Most are decades-old, designed for the storms of last century.

Even today, [cities lack updated rainfall data that reflects how storms are getting more intense](#). That means they're still building new projects without climate change in mind. Federal officials with the National Atmospheric and Oceanic Administration say the agency hopes to begin the process of creating new rainfall forecasts next year. Still, that information isn't likely to be ready in time for cities to use it for the new wave of federally funded infrastructure projects.

Planning for heavier downpours means building larger stormwater systems, but replacing miles of pipes and upsizing existing infrastructure is far more expensive than cities can afford. Experts say green infrastructure can reduce the need to replace as much gray infrastructure. If rain gardens absorb some of the runoff, stormwater pipes don't need to be as large.

That makes green infrastructure potentially more cost-effective. A New York City study looked at using a combination of gray and green infrastructure in one neighborhood in Queens and found that [using gray infrastructure alone would be twice as expensive](#). Still, a handful of rain gardens won't be enough to prevent flooding, experts warn.

"The challenge is that we need this at scale," McPhillips says. "And especially in these older cities that have built out a lot of hard surface and have gotten rid of the ability for soils to naturally soak in rain, we have a lot to get back to correct for those issues."

Flooding is especially problematic in low-income neighborhoods and communities of color, which generally have fewer parks and where the infrastructure is often more neglected

"The fact that the majority of communities of color lack sufficient green space compared to their white majority counterparts – that is still a problem," says Fushcia-Ann Hoover, who works on green infrastructure at the University of North Carolina at Charlotte. "And so I think that green infrastructure does provide a possible solution."



Replacing concrete with green plants, like this project in Emeryville, Calif., can help overwhelmed stormwater systems handle increasingly bigger rainstorms.

Joshua Bradt

As infrastructure spending begins, green projects could be just a "stepchild"

Over the next five years, the Environmental Protection Agency will give states more than \$11 billion for water infrastructure projects through the Clean Water State Revolving Fund. In March, the [EPA released guidance](#) encouraging those funds be used in disadvantaged communities and that states take climate change into account.

"Most cities think about the green and the gray separately, but really the power is integrating these two things," says Radhika Fox, assistant administrator for the EPA's Office of Water.

Still, under guidance from Congress, only 10 percent of the funding must be spent on green infrastructure or water efficiency projects. The last time the government provided a big infusion of infrastructure funds in 2009 [the requirement was for 20 percent of projects to be green](#).

The EPA also emphasized that states have discretion and flexibility to spend the funds as they see fit. The Biden Administration has already gotten pushback from Republicans about encouraging states to consider climate change in spending infrastructure dollars. In February, top Republicans [sent a letter](#) encouraging states to ignore similar guidance from the Department of Transportation.

"It does put states in the driver's seat in terms of identifying and working with communities within their borders to find infrastructure projects," Fox says.

The need to repair and upgrade gray infrastructure may take priority over green projects in many communities. In 2020, municipal utilities faced a funding shortfall of \$8.5 billion, according to a study from the Water Environment Federation.

"Stormwater systems, green infrastructure and other systems that are tied to the climate crisis have been a stepchild to the types of systems we pay attention to," Hendricks says.

Time running out to save Christchurch's trees from housing intensification

Tina Law 05:00, Mar 05 2022

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Supplied

A bleak-looking Chester St East in the 1980s on the left. Now it is leafy and green.

Christchurch is the Garden City and has been for years, but its leafy status is under threat as more trees get the chop to make way for intensified housing. TINA LAW looks at what, if anything, can be done to protect the city's green canopy.

Forty years ago an inner-Christchurch street was a sea of grey asphalt, its appearance so bleak that some described it as a slum.

Fast-forward to 2022 and Chester St East is now one of the central city's most charming roads, the area transformed by well-established trees and grass verges.

Yet many other streets in Christchurch remain grey and dominated by concrete – not a good look for a city that [wants to become a National Park City](#).

READ MORE:

- * [Christchurch's leafy status under threat, urgent action needed to protect city's tree canopy](#)
- * [Can Christchurch build up instead of out without spoiling the Garden City?](#)
- * [City council pushes for change to Government's new housing rules](#)
- * [Christchurch may not be as green and leafy as you think](#)
- * [Flooding work approved after councillor digs unauthorised trench](#)

There are growing fears the number of streets devoid of trees will only increase as the Government brings [in new rules allowing greater development and intensification](#).

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Time is running out to protect the trees that are there, and Christchurch City Council needs to act now to protect its remaining trees, city councillor Yani Johanson says.

One resident has raised the idea of ratepayers paying a separate annual levy to help beautify the city's grey areas. While the proposal has received support from some quarters, others say the council should be prioritising this work as part of its normal budget.

Christchurch is starting from a relatively low base when it comes to tree coverage, especially when compared to other cities.

A [recent survey](#) shows about 13.5 per cent of the city is covered by tree canopy. This is lower than in 2015/16, when it was 15.6 per cent.



JOHN KIRK-ANDERSON/Stuff

Hornby has the least tree coverage of any ward in the city, with just 6.5 per cent of the area covered with a tree canopy, a point starkly obvious when looking at Neill St.

The figures are based on data collected in 2018/19, and Johanson suspects the actual tree loss now will be much greater, possibly double, given the number of trees that have been cut down to make way for housing intensification.

The lack of trees is most stark in some of the city's lowest socio-economic areas like Hornby and Linwood, where the tree canopy coverage sits at just 6.5 per cent and 8.9 per cent respectively.

Compare that to some of the city's more affluent suburbs, which have the highest tree cover.

Cashmere is sitting at 21 per cent and Fendalton at 19 per cent. The Coastal ward, which stretches from Southshore to Brooklands, has 27 per cent coverage, but that includes Bottle Lake Forest. The survey does not include Banks Peninsula.

The council says some loss reflected in the survey is due to trees being felled at plantation forests at Bottle Lake, Chaney's and McLeans Forest. Only trees taller than 3.5 metres were counted in the survey, and replanted trees are not yet tall enough to be counted.

The city also lost a significant number of trees on [the Port Hills due to the 2017 fire](#).

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Auckland had a canopy coverage of 18.4 per cent between 2016 and 2018, and in Wellington the tree canopy coverage was about 30.6 per cent in 2019.



JOHN KIRK-ANDERSON/Stuff

A decent tree canopy covers Rose St in Somerfield, a suburb next to Cashmere. The ward has 21 per cent tree coverage.

Christchurch-based ecologist Colin Meurk, who works for Canterbury and Lincoln universities and Manaaki Whenua - Landcare Research, says it is not surprising more hilly cities like Auckland and Wellington have higher tree canopy coverage, because they have gullies where trees can grow and that are unsuitable for housing. Yet in a largely flat city like Christchurch, every square metre could potentially be developed.

Meurk says we need to bring nature into our cities and connect it with where most people live.

Many community groups have done plantings along the city's rivers, parks, hills, coast and around wetlands and while this is happening under the radar, those trees will begin to visibly flourish over the next decade, he says.

However, it appears the city has come a long way from when the early settlers caught a first glimpse of their new home from the Bridle Path track.

Christchurch forest ecologist Mark Belton says the city was a desolate place back then, almost entirely devoid of trees. Only tiny remnants of forest were visible, at Riccarton and Papanui.

The Deans family secured protection of Riccarton Bush in 1849 and the area is now home to the city's oldest trees, which Belton says existed around the same time as the moa, seven centuries ago.



ALDEN WILLIAMS/Stuff

Riccarton Bush is home to Christchurch's oldest trees.

Settlers then went about planting tree species from their homelands and Christchurch now has the greatest variety of tree species of any city in the world, Belton says.

He believes that is worth "celebrating, conserving, enriching, and extending with further plantings".

Intensification threat

There are more than 1100 protected trees on private land across Christchurch, but there used to be a lot more.

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About 530 were removed from the protected list in 2016, giving property owners the right to cut down a previously protected tree without a resource consent.

The council signalled in 2015 it wanted to take more than double that number off the list, but the plan was widely criticised by residents and environmentalists.



JOHN KIRK-ANDERSON/Stuff

Crs Yani Johanson and Pauline Cotter want the city council to take urgent action to protect Christchurch's tree canopy before it is too late.

The council then introduced a new assessment system, which meant 530 did not meet the new thresholds around health, structure, or shape.

During the past 12 months the council has received five applications for trees to be removed from the protected list, and it accepted all five.

All street trees taller than six metres and park trees higher than 10m are protected under the district plan.

There are more than 20,000 street trees and 18,000 park trees in Christchurch. About 19 per cent of publicly-owned land in Christchurch is covered by trees.

So the city does appear to have a lot of trees, but it is the [threat coming from a Government push to intensify housing that has many worried](#).



CHRIS SKELTON/Stuff

Work is under way to clear an area for a new development on the corner of Cambridge Tce and Manchester St.

New rules will allow intensification to spread across most of the city, rather than just the central area and a select few suburbs.

There are fears this intensification will spell the loss of trees as single homes with large sections are transformed into dense collections of properties with few trees.

From August buildings of up to three storeys will be allowed on most city sites without any need for resource consent. This applies to landowners in Auckland, Hamilton, Wellington and Christchurch.

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The Government's new law will require 20 per cent of the multi-resident complexes to be landscaped with grass or plantings, but does not include an existing regulation for minimum tree heights.

The [city has already lost a number of trees to multi-unit developments](#).

Johanson has been asking the council since it developed its tree strategy more than a year ago to prioritise changes to the District Plan to provide greater protection of existing trees, but he says nothing has happened.

The policy sets out how the council will manage and maintain trees in public spaces.

One of its key tenets is that for every tree removed a minimum of two new trees will be planted, and they must replace the lost canopy cover within 20 years.



Christchurch City Council

Christchurch City Council has produced an artist's impression of what a typical Christchurch suburb could end up like under new housing density rules being pushed through by the Government.

But Cr Pauline Cotter points out that while the two-for-one policy is good, once a mature tree is cut down it takes many years for a tree to reach the same stage of maturity to provide the environmental and climate change benefits.

Christchurch mayor Lianne Dalziel told a council meeting last week that people needed to realise there were two governments that changed the Resource Management Act (RMA), and they did so to take away the ability for councils to protect trees on a blanket basis.

After the meeting she said the council used to be able to send in an arborist to look at trees and protect them before work on subdivisions started. The law does not allow it to do that now.

Cr Sara Templeton says she is getting information together to ask Local Government New Zealand to lobby the Government to reintroduce some of the tree protections that were taken out of the RMA.

She says she understands the need for greater density housing, but believes tree cover needs protecting too.

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Mature trees tend to be planted at property boundaries, Templeton said, so she believes developers should be able to work around them while still building density.

Why Christchurch should become a National Park City

CHRIS SKELTON/STUFF

Hayley Guglietta is keen to galvanise Cantabrians to get behind the idea of creating New Zealand's first National Park City. (First published August, 2021)

The council is also working on a separate plan to boost its tree canopy, but Johanson is frustrated at the time it is taking. The clock is ticking.

A draft Urban Forest Plan is due out sometime in the first half of this year, according to council staff.

They say it will provide “a long-term vision and strategy to maximise the health and sustainability of the city’s urban trees and forests and the benefits we receive from them”.

It will include targets for the city such as tree canopy cover and species diversity and will have a list of actions required by the council to ensure it meets those targets.

The draft will be put out for consultation before being confirmed, so it is unlikely to meet the end of June deadline for the council’s 2022/23 budget.

Despite this, trees are still being planted across the city and money is being spent on them.

The council has budgeted \$430,000 this financial year to spend on tree planting, mostly to cover the two-for-one policy.

This figure, the council says, does not take into account tree-planting associated with specific projects like cycleways, nor does it include the extensive planting happening in the residential red zone and other joint projects with various groups along the Styx River catchment and the Summit Rd.

There is also another plan which is already operational and is starting to make a difference in an area that really needs it.

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Dawson Lane off Chester St East is now a pleasant place to stroll, a far cry from its run-down aspect in the 1980s.

Greening the East is the brainchild of former city councillor and community board member [Sally Buck](#), who died in 2020.

The plan was approved in 2021 and its aim is to ensure residents in an area bordered by Fitzgerald Ave, Cashel St, Avonside Dr and Linwood Ave, can “connect to and be enriched by a green, biodiverse and healthy neighbourhood”.

Cr Jake McLellan says Linwood is an area that has been left behind, with plenty of high-density units and lots of concrete.

He says the Greening the East plan will see more trees, green corridors, walkways, pocket parks, nature play areas and spaces that encourage biodiversity, as well as greater maintenance levels of green spaces.

It is an ambitious plan, he says, and one that will be rolled out over the next decade.

He is determined for it not to sit on a shelf gathering dust, and says lots of work is already under way.

Linwood has already been affected by intensification and is likely to continue to be for the foreseeable future, so the plan aims to counter some negative effects of that.



Dean Kozanic/Stuff

Christchurch-based ecologist Colin Meurk says we need to bring nature into our cities and connect it with where most people live.

Greening the East has already resulted in increased maintenance at local parks, extra park seats and picnic tables being installed, as well as additional plantings at Worcester Corner Reserve, McLellan says.

About \$172,500 has been budgeted for each of the next two financial years to help fund the plan. The money needs approving during the annual plan process, but it is already sitting in the draft budget about to go out to consultation.

It will go towards planting 40 street trees on Cashel, Hereford, Worcester and Gloucester streets.

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McLellan believes the plan could be rolled out as a gold standard model for how the council can mitigate the effect of future intensification in other areas of the city.

Chester St East is a great example of how community lobbying, political will and public money can make a difference in the look and feel of a place.

Central city resident Simone Rewa Pearson says before and after photos of the street show the power of what the council can do if it has sufficient funds.

Specialist tree fund

She suggested the council adopt a “beautify Ōtautahi levy”, similar to the Christ Church Cathedral levy, but it would instead be used to increase tree coverage.

Templeton says there is precedent for such a levy with [Auckland mayor Phil Goff proposing a climate charge](#), and Dalziel says it seems like a good idea but would need more investigation.

Heritage campaigner [Dame Anna Crighton](#) says while she is concerned at the number of “beautiful large trees” getting bowled over for developments across the city, she believes the council should front up with the cost to beautify the city itself.

[More from
Tina Law • Senior reporter
\[tina.law@stuff.co.nz\]\(mailto:tina.law@stuff.co.nz\)](#)

She supports Templeton’s push to get the Government to reinstate some tree protections taken out of the RMA, but is not too keen on Pearson’s levy idea.

Crighton successfully campaigned to get poplar trees planted by [Thomas Edmonds](#), of “Sure to Rise” baking powder and cookbook fame, protected. He was born in Poplar, London.

[Mayoral candidate Phil Mauger](#) does not like the levy idea either, and believes the council should be doing the work itself rather than calling on residents for extra cash.

But he is also advocating for the council to cut down some trees.

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Mauger is quick to point out he thinks the city should retain as many trees as it can, but he wants street trees that are causing problems to go – and it appears there are quite a few of them.



JOHN KIRK-ANDERSON/Stuff

Tessa Whitaker, 9, loves climbing trees, and her mother, Maja Whitaker, would like to move to Cashmere for that reason.

Mauger has amassed dozens of photos of footpaths, kerbs and wastewater pipes damaged by street trees with shallow roots.

He says some subdivisions built in the 1980s had unsuitable trees planted, and now they are causing problems for residents and they should go.

“If some old bugger goes outside down the road and trips over and breaks his jaw, we are in the gun.”

Mauger says he gets lots of complaints from people about damage caused by trees.

“I’m not against trees, just the ones that are causing grief.”

To make up for ones cut down he suggested the council could plant more trees at Rawhiti Domain and in Brooklands, which was partly red zoned after the earthquakes.

Don’t miss important Christchurch news

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So why do we care so much about trees?

Belton says it is well documented that mental health and well-being in urban areas are correlated with a strong presence of trees.

“Trees provide privacy and shelter, and screen much of the ugliness of our built environments.

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“Imagine your neighbourhood devoid of trees.”

Unfortunately for some, they do not have to imagine.

*In an earlier version of this story some of Mark Belton’s comments were incorrectly attributed to Colin Meurk.

No news is not good news, Canterbury

Our ever-changing region has many exigent stories to tell. Petrol and grocery prices are putting huge pressure on families. We have an opportunity to become a national park city. Our much-needed new stadium is opening on the First-of-Never. There's a relentless stench haunting our lives.

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What are the negative impacts of high-rise buildings?

High-rise buildings **degrade the thermal environment of their surroundings through wind turbulence, cooling, and excessive heating.**

Among the most obvious of high-rise building issues, **fire safety and security** are the most concerning.

The people living in multi-storey buildings **do not have more space**. It has too many stairs, so people use a lift to go to their rooms. If they caused any short circuit, they have to use stairs. They then to face problems such as carrying shopping. Dealing with young children.

Several [recent studies](#), for example, suggest that during the outbreak of highly infectious disease, high-rise dwellers on all floors are at higher risk than people living in single or detached homes.

Currently, those of us living in large apartment buildings worry about increased exposure to coronavirus when you consider the number of residents touching door handles and elevator buttons, though most buildings have notified tenants of increased cleaning protocols. As [6sqft recently explained](#), some property management companies and landlords have banned moves during this time and are not allowing large packages that require the use of the elevator to be delivered.

Then there are the mental health issues to consider. Australian architect Kerry Clare [warned in 2016](#) that high-rise living is harming Australia's "urban fabric" by isolating people from street life. According to Clare, more people living in high-rise buildings means more people living in social and economic silos where the chance encounters of street life are severely compromised. In many respects, Clare's position resonates with the thinking of New York's own [Jane Jacobs](#). In her 1961 classic, *[The Death and Life of Great American Cities](#)*, Jacobs condemned high-rise living, especially when used as a low-income housing solution. "The corridors of the usual high-rise, low-income housing building are like corridors in a bad dream...creepily lit, narrow, smelly, blind." Jacobs further lamented, "They feel like traps and they are. So are the elevators that lead to them." The social isolation that Clare and Jacobs both associated with high-rise living is often linked to depression and other mental health problems.

Petition update

Disappointingly the City Council voted to adopt the Governments flawed housing intensification plan



Greg Partridge
New Zealand

Mar 1, 2023 —

In case you haven't heard through the media already, the Christchurch City Council voted **HEAVILY** in favour of adopting a modified version of the governments heavily flawed widespread housing intensification plan.

This modified housing intensification plan will now impact 56% of properties across our city neighbourhoods and her suburbs.

This was after government appointed investigator John Hardie threatened the City Council the government might impose an even worse version of the plan our Council have created if they were to reject the government's plan and vote "NO!" to adopting it for a second time, an historic move the Christchurch City Council first made in September 2022.

www.rnz.co.nz/news/national/474708/christchurch-city-council-votes-against-introducing-government-housing-plan

To be fair it must be acknowledged the Councils modified plan includes recession plane rules more in line with sunlight angles here in Christchurch than the Government's Auckland-based rules.

Even under the revised plan however, ground floor homes situated next to the newly permitted much taller buildings being erected under the new rules will have their sunlight blocked for three months of the year. That will invariably forcing up heating costs during winter for many vulnerable residents (including the elderly) who are already struggling to pay rising electricity bills during a cost of living crisis.

The modified plan permits the construction of three, three-storey homes per property across more than half of Christchurch without a resource consent, suffocating neighbouring property owners from any rights to lodge an objection with the Council.

It also allows six-storey buildings within 600 metres of main shopping areas in our suburbs, and four storeys near smaller shopping areas, all without a resource consent.

Encouragingly most Councilors said they did not agree with the plan being imposed on our city by the government. Many voiced their feeling that the risk of not adopting it was too great given the treat outlined by the Government.

Mayor Phil Mauger said the Council had “run out of road”, and the Government had given “a clear signal”.

Deputy Mayor Pauline Cotter agreed the housing intensification “will not lead to improved affordability”, and she worried about shading. However, she said the council was “between a rock and a hard place” and the risk of Government taking over was too great.

Councilor Yani Johanson was opposed to the plan. He said evidence showed there was “nothing in this plan change would lead to any significant difference in housing affordability”.

“I am concerned that there hasn’t been an adequate social assessment of what is proposed ... if we get intensification wrong, that will lead to poor outcomes in our community.”

Most Councillors said they were torn in their vote, with several saying the plan was far from perfect, but they were left with no choice and it was time for the public to have a say.

Councillor Mark Peters (Hornby) said Christchurch was being bullied by central Government, and Councillor Tim Scandrett (Cashmere) said he was “really disappointed in Wellington” [the Government] but the council had little choice.

Despite the warning, three City Councillors still voted against it:

- Mark Peters - Hornby
- Aaron Keown - Harewood
- James Gough - Fendalton

There is still the possibility of a reprieve however, and for the voice of the public to be heard through a Hearings Panel, to which submissions can be lodged up until 28 April.

This petition will be included in those submissions, so please share it with as many people as you possibly can in order to increase the numbers who have signed it and for the voice of Christchurch residents to be fully heard by the Government in what is supposedly a democratic society.

Thank you

Historic earthquakes

Canterbury's most severe earthquake prior to these occurred on 1 September 1888 about 100km north of Christchurch in the Amuri district. It is recorded as a [magnitude 7.1 earthquake](#), but reached magnitude 9 at its epicentre. Extensive vertical and horizontal ground movement caused considerable damage to buildings and land. The quake badly [damaged the spire of the Cathedral](#) as well as buildings throughout Christchurch.

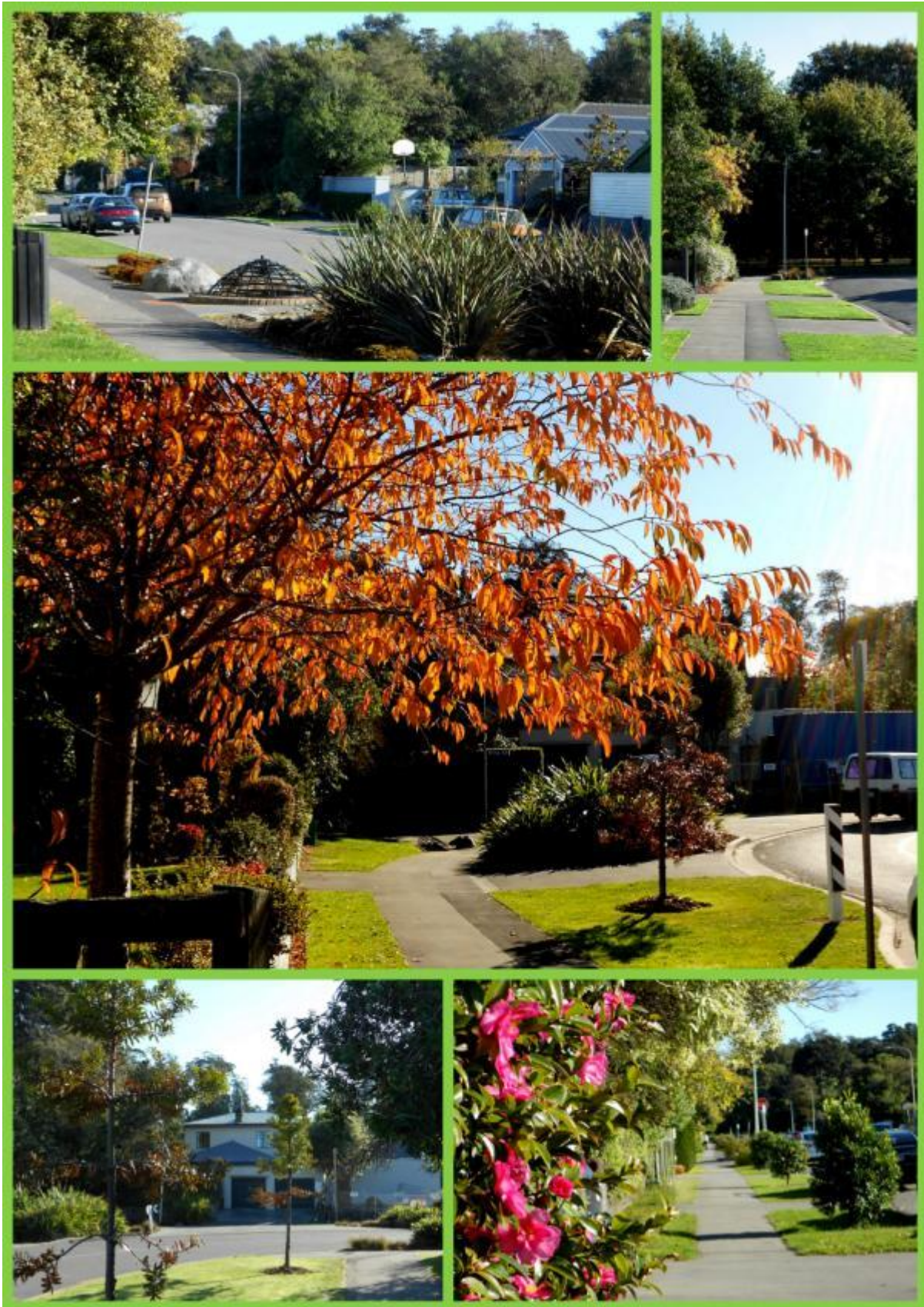


Some of the destruction by earthquake at Cheviot, North Canterbury, 16 Nov. 1901 : back of McTaggart's butcher/baker shop. [17 Nov. 1901] [CCL PhotoCD 5, IMG0067ChristChurch Cathedral](#) was damaged by three quakes during its construction – [1881](#), [1888](#) and [1901](#).

STREETSCAPES - ENTRIES TO PRECINCT – APPENDIX 3



PARK-LIKE STREETSCAPES



(Enjoyed by the many pedestrians who pass through en route Riccarton shops and Riccarton)

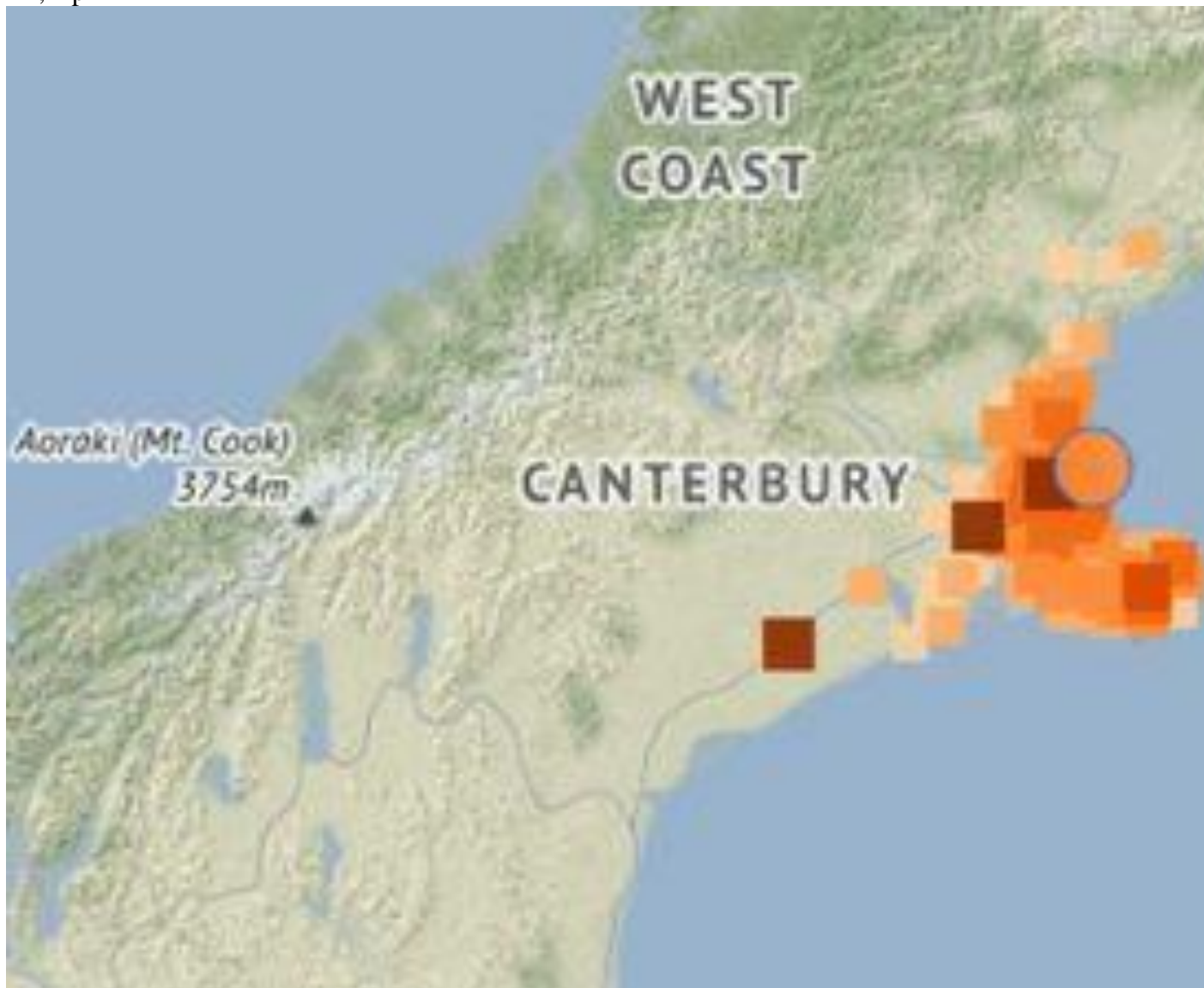


<https://nzhistory.govt.nz/keyword/earthquake>

<https://my.christchurchcitylibraries.com/christchurch-and-canterbury-earthquakes/>

Early morning quakes rattle Christchurch

Fri, Apr 21



A series of quakes have struck north-east of Christchurch this morning. (Source: GeoNet)

Thousands of people in Christchurch have been jolted awake after a series of three earthquakes struck early this morning.

A 4.0 magnitude quake struck 10 km north-east of Christchurch about 2.20am. The quake came at a depth of nine kilometres, causing moderate shaking, according to GeoNet.

It was followed by a second, 3.6 magnitude quake 10 km north-east of Christchurch at 7.31am. The light earthquake came at a depth of 10 km.

A third, 4.3 magnitude quake 10 km north-east of Christchurch followed nine minutes later, at 7.37am. The moderate quake had a depth of eight kilometres.

There were around 15,764 'felt reports', most of whom reported weak to light shaking, GeoNet said.

Slow grow: Christchurch's urban forest will take decades to form

Will Harvie05:00, Feb 10 2023

-
-
-
- [12](#)



ALDEN WILLIAMS/Stuff

Cashmere is one of the greenest suburbs in Christchurch with trees covering one-fifth of the land area.

ANALYSIS: An ambitious proposal to cloak one-fifth of Christchurch in trees by 2070 recommends doubling the proportion of tree-lined streets and tripling tree numbers along the city's rivers and streams.

That's the gist of the council's draft [Urban Forest Plan](#), which was released for [public consultation](#) last week.

The document is 32 pages of ideas on how to grow the Garden City's "tree canopy" – defined as trees 3.5m and higher and measured by an aerial surveys.

ADVERTISING

And here's the thing: It will be hard and take decades to achieve even modest improvements.

READ MORE:

- * [Time running out to save Christchurch's trees from housing intensification](#)
- * [Christchurch's leafy status under threat, urgent action needed to protect city's tree canopy](#)
- * [Christchurch may not be as green and leafy as you think](#)

For example, the 600-hectare residential red zone has a tree canopy covering about 10% at the moment.

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If the red zone canopy was increased to 80% – the sort of thing that dreamers and doers hope to achieve – Christchurch's total canopy cover would increase [by 1.09%](#).

That small improvement is absolutely worth achieving, but wouldn't propel the Christchurch into the heights of tree canopy glory.

Auckland's tree canopy is 18% and Wellington's 30%. Christchurch City Council staff want to be above 20% by 2070. However, as the report explains, this requires human intervention as Christchurch has "very little natural regeneration" unlike Auckland and Wellington which were primarily forested areas prior to European colonisation.

It was about 13.6% in 2018-19, down from 15.6% in 2015-16, according to a [2022 report](#) by University of Canterbury urban tree expert Dr Justin Morgenroth.



ALDEN WILLIAMS/Stuff

Some of Christchurch's lower income suburbs also suffer from having fewer trees.

So, how does the council hope to regrow the city's forest, not including Banks Peninsula?

Rather obviously, plant way more trees. Mostly native trees but not exclusively.

But 57% of land in Christchurch land is privately owned. The plan isn't to compel owners to plant trees capable of reaching 3.5m or more.

Rather, the plan is to plant public land much more intensively. The tree canopy in public "open spaces" is about 23% now. They want it to be 40% by 2070.

Increased tree numbers can help the city cope with climate change, the report explains. For instance, on a 30C day in Christchurch, roads and footpaths can reach temperatures in excess of 50C. "Under trees, those same surfaces can be more than 20 degrees cooler."

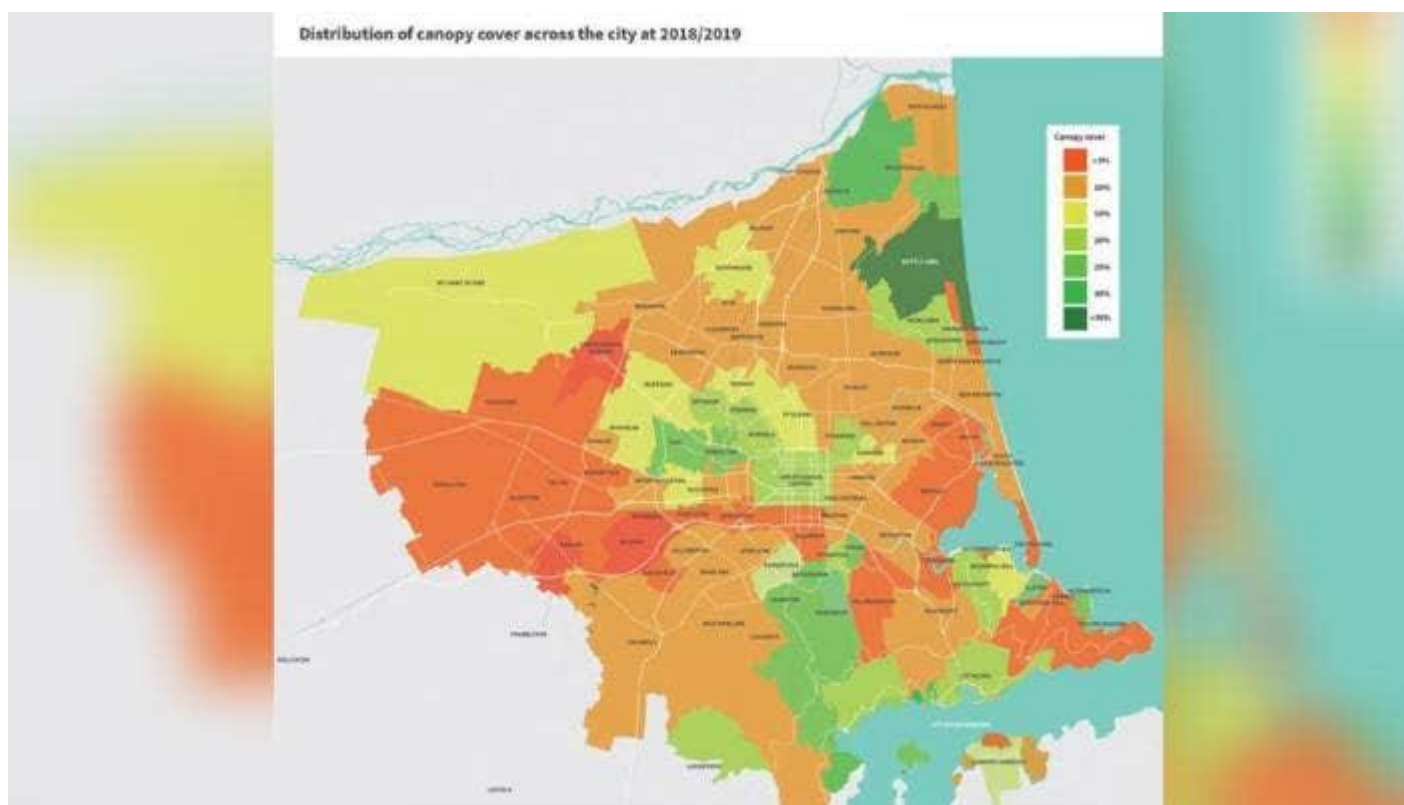
Next time you're in a reserve walking the dog or the kids, look for places where trees could be planted. There's no need to sow the cricket ground, but around the edges. Or where there are random patches of grass serving no purpose other than being green and employing mower drivers.

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Now imagine that as a small forest plot, maybe with walking paths meandering through.

They also want to double the street tree canopy, from the current 8% to 15% by 2070. Trees along the banks of the city's waterways will increase from the current 21% to 70% by 2070, under the plan.



CCC/Supplied

Canopy tree cover across Christchurch in 2018-19. The greener the better. Orange indicates about 10% canopy and red indicates 5% or less,

The plan also addresses “equitable tree coverage”. Basically, rich “leafy suburbs” aren’t a myth. Canopy cover in Cashmere is 21%, Fendalton 19% and Innes 19%. The bottom three are Halswell (9%), Linwood (9%), and Hornby (6.5%).

They are missing out on the many benefits of a tree canopy – more shade, lower temperatures, fewer pollutants, more biodiversity, less erosion, more climate change resilience, and better physical and mental health.

The council wants no ward to have less than 15% canopy cover by 2070.

To achieve this, the council will even consider buying land suitable for forests.

Needless to say, this isn’t funded. Given the large amount of publicly-owned grass around the city not used for sport and capable of hosting a tree, the need to buy more land seems decades off.

Indeed, of the 44 “actions” in the plan, 12 are currently funded and 32 are not. The funded dozen include the council’s current policy of replacing any tree felled on public land with two new ones, and maintaining a register of “significant” trees.

One important action not funded is ensuring the canopy targets are “considered in all council projects and planning documents”. Implementation is supposed to start this year and run until at least 2032.

Another unfunded idea is investigating how to incentivise private landowners to keep and plant more trees.

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ALDEN WILLIAMS/Stuff

The plan proposes increasing the proportion of tree-lined streets from 8% to 15%. Pictured is Eveleyn Cousins Ave, Richmond.

There is one proposal on the council’s table worth mentioning: [Plan Change 14](#). This arose from central government legislation to increase housing density. PC14 would have allowed up to three homes, up to 12m high, to be built on most residential sections without resource consent.

Last September, Christchurch councillors voted against notifying PC14 – the “[proverbial finger](#)” to [Wellington](#).

Buried in PC14 was a plan to force property developers to keep or plant trees on their projects or [pay a levy](#) for council to plant those trees elsewhere.

[More from](#)
[Will Harvie • Senior reporter](#)

will.harvie@stuff.co.nz

And that's the central conundrum of the Urban Forest Plan. If passed by council, it runs square into intensification – at least in the early years.

With Christchurch's population expected to increase 21% to 480,000 by 2050, we have to find room for all these new people, and now, monumental numbers of trees.

The Urban Forest Plan is open for submissions until March 6. Comment at [HaveYourSay](#).

Success story: the transformation of Singapore into a sustainable garden city

Wednesday, January 13, 2021

My list

Share

Author | Tania Alonso Singapore is a series of **parks and green spaces**. Vegetation starts out on the ground and reaches [the very top of buildings](#), it grows on terraces and also inside houses and offices. But this has not always been the case. Just under 50 years ago, this city-state, which was then an emerging country, **began a race** to become one of the cleanest and greenest cities in the world. It is a success story recognised the world over.

A change of strategy



“A two-stage plan, which will transform Singapore into ‘a beautiful garden city with flowers and trees, without waste and as neat and orderly as possible’ was announced today by the prime minister Lee Kuan Yew”, [*The Straits Times*](#) communicated on 12 May 1967. This plan **marked the start of the transformation of this small Asian city-state**, which was a dirty and highly polluted city, into a green and sustainable model.

The first stage consisted of removing rubbish from the streets (“often the result of lack of public awareness and apathy”, in the words of the prime minister). The second, **educating people**. At the time, [this newspaper indicated](#), it was normal to throw rubbish out of windows or into public drainage systems, or to see street vendors and motorists simply throw rubbish out of vehicles.

In order to implement these measures, **new laws had to be created**, such as the one establishing that each household and business had to have a rubbish bin (more than half the households in the city did not own one) or the law that increased taxes for those that generated more waste. On 12 May 1967, ‘The Strait Times’ already indicated why this transformation was necessary. Firstly, it would improve public health by **reducing the number of mosquitos, flies and diseases**.

“There is no choice but to have an efficient cleaning service, given the tropical climate of Singapore, which encourages waste decomposition and the high density of its population”, [this same newspaper indicated](#) 12 years later. The government’s second reason was **to attract tourism to a cleaner city**, which would increase employment rates and the interest of foreign investors in Singapore.

The start of a garden-city



The projects to clean the streets, **the drainage system and the Singapore river**, which gradually changed and were adapted in subsequent decades, were completed together with others to increase green spaces. The ‘Singapore, garden-city’ project (which was later renamed ‘Singapore, a city in a garden’) was based on an initial premise: to improve the quality of life of inhabitants **introducing [vegetation into public spaces](#)**. At the end of 1970, [more than 55,000 new trees](#) had been planted and, by 1971, a tree planting day was inaugurated, an annual event that involved huge numbers of people.

The transformation was also reflected in laws such as the *Parks and Trees Act*, enacted in 1975. This required government and private agencies to **reserve spaces for trees and vegetation** in their projects and buildings. The list did not end here: the number of parks and natural spaces increased, campaigns such as the '*Clean and green week*' were introduced and citizens' environmental and ecological education was improved. As a result, the city has seen **its green areas continue to grow**. A large network of tree-covered and pedestrian corridors connecting parks with one another and the number of new trees increased from approximately 158,600 in 1974 to 1.4 million in June 2014.

Eco-friendly building and vertical gardens



As these green spaces grew, so did the population of [Singapore](#). This posed a challenge, since the city-state has a **high population density**: today, Singapore has a population of over five million in less than 700 square kilometres. The solution to continue creating green spaces despite the increased population was to combine architecture and vegetation. [Green building has been mandatory](#) since 2008 in Singapore. It is normal to find plants on the top and the sides of buildings (like cascading gardens) and also inside the buildings. Behind measures

such as these, is Cheong Koon Hean, who was the first woman to head Singapore's urban development agency.

One of the finest examples of the union between architecture and nature on the island is the [Jewel Changi airport](#). The last extension, designed by the architect Moshe Safdie, combines natural light, water and green spaces. Another good example are the *supertrees*, 50-metre tall artificial trees located in the famous *Gardens at the Bay*. These structures offer a light show (powered by solar energy) and also have **more than 150,000 real plants** embedded on its sides.

Change of perspective

“In many countries, short-term approaches have prioritised economic development over the environment. A change of mentality was needed”, [according to Masagos Zulkifli](#), Minister for the Environment and Water Resources of Singapore. “Our approach has been to build a habitable and sustainable city through a pragmatic policy, based on solid economic and scientific principles, a **long-term planning** approach and the effective implementation and capacity to gain the support of the people for the public interest.

Many of his measures, such as the integration of sustainable infrastructures and increasing [green spaces in the city](#), may help to achieve various UN Sustainable Development Goals. For example, **reducing cities' negative environmental impact per capita**: the presence of trees and green areas contributes to the reduction of carbon dioxide emissions into the atmosphere and the effects of the [urban heat island](#).

One of Singapore's main strengths in following this line of action in the future is the environmental awareness of its citizens. For [Lim Liang Jim](#), director of the National Parks Board's National Biodiversity Centre, **educating young people** is essential in order to maintain the achievements reached in the city-state: “If in the future someone says ‘let's not think about green, let's build', a significant portion of the population will act as **informed advocates for nature's conservation and green spaces**”. Images | [Yeo Khee](#), [Lita Ruza](#), [Kenneth Koh](#), [Victor](#)

Tags

Urban Tree Cover

Tree Cover and Green Space provide a number of environmental benefits to urban residents, including shade and evaporative cooling, as well as providing habitat for biodiversity.

Chapter Authors

- [What It Measures](#)
- [Why We Include It](#)
- [Where the Data Comes From](#)
- [What are the Targets?](#)

The Urban Tree Cover indicator measures the presence of tree cover within a city. This indicator also acts as a proxy for a city's green space — the physical presence of vegetation — within city neighborhoods. The Urban Tree Cover/Green Space issue category includes two indicators: Tree Canopy Cover Loss and Tree Cover Per Capita.

The Tree Canopy Cover Loss indicator describes the total area (in square kilometers) of urban tree loss from 2001 to 2016, benchmarked against the tree cover baseline extent in 2000. As defined by Hansen et al. (2013)¹, *tree cover loss* is a stand-replacement disturbance, or a change from a forest to non-forest state, such as the removal or death of trees, regardless of the cause and inclusive of all types of tree cover.

The second indicator, Tree Cover Per Capita, assesses a population's access to its urban forest, measuring the tree cover extent per person living in the defined area of analysis. A variation of this indicator, Tree Cover per Capita Deficit, is also calculated, and defined as the additional square meters of tree cover needed to reach the UN-Habitat's suggested 15 square meters (m²) of tree cover per capita.

Description

History of identifying and monitoring urban green space

Green spaces and parks have been a feature of cities since ancient times. Beginning in the late 19th century, many urban planning schools and approaches sought to capture their role and relevance for cities. The Garden City Movement²³, founded in 1898 by Ebenezer Howard in the United Kingdom, proposed the development of limited-size cities, with proportionate areas for housing, industry, and agriculture, surrounded by rural green belts. The City Beautiful Movement, developed in the US since 1893, promotes the beautification of cities using, among other features, parks and green spaces²⁴. The New Urbanism movement gained prominence in the 1990s. Its main components include the strong need for public space, of which public green space is a key element²⁵. The Sustainable Communities Movement has also grown since its founding in the mid-1990's – it aims to bring the concept of sustainability to the urban context, and highlights the use of green spaces to address many urban challenges²⁶.

All of these movements, with their respective approaches and limitations, aim to improve citizens' quality of life, often in response to poor conditions in urban centers, and include

green space as an important tool to achieve this goal. Most recently, the adoption of the Sustainable Development Goals (SDGs), particularly SDG 11, and the New Urban Agenda (NUA) — which includes the explicit objective of achieving equitable access to green spaces for all citizens — demonstrate the increasing recognition of urban green spaces' importance in making urban centers more sustainable.



Given the benefits it provides, the identification and monitoring of urban vegetation has been explored through different techniques, primarily through remote sensing imagery or survey-based data²⁷. Remote-sensed imagery has been used extensively in studies that aim to relate land use patterns with other spatial features, such as land temperature or air pollution. Survey-derived data, such as administrative inventories of green spaces, have been used in studies exploring issues around access to green spaces and the equitable distribution of green spaces in a city. Recently, new approaches have leveraged additional datasets to measure green space. The Treepedia project²⁸, for instance, uses street-photographs to measure the greenness of a city (see Box 2 for additional details about the Treepedia project). Box 1, *Complementary measures of greenness in urban spaces*, highlights the relationship between satellite-derived measures of urban tree canopy and additional sources of information, such as administrative data about parks and street trees within a city.

Box 1. The complementary measures of greenness in urban spaces.

The most common approaches to analyzing of urban vegetation involve either remote sensing imagery, data derived from field surveys, or a combination of both. While these approaches aim to measure a city's greenness, due to limitations in their nature and methods, none can completely measure all its elements, and the results of different indicators for the same city could be significantly different.

To explore these differences, the following graphs compare three different indicators that measure the green space for the city of Sao Paulo using different approaches. The first

indicator, TREECAP, represents the total amount of Tree Cover per person, measured from the Global Forest Change Dataset (Hansen et. al. 2013), and is an example of a satellite-derived indicator. The other two indicators examine the green space of a city using primarily survey-based data. The PARKCAP indicator represents the total amount of official park area per person, measured using the city of Sao Paulo's official public park repository. The STREECAP indicator measures the number of street trees per person, according to the city's street database.

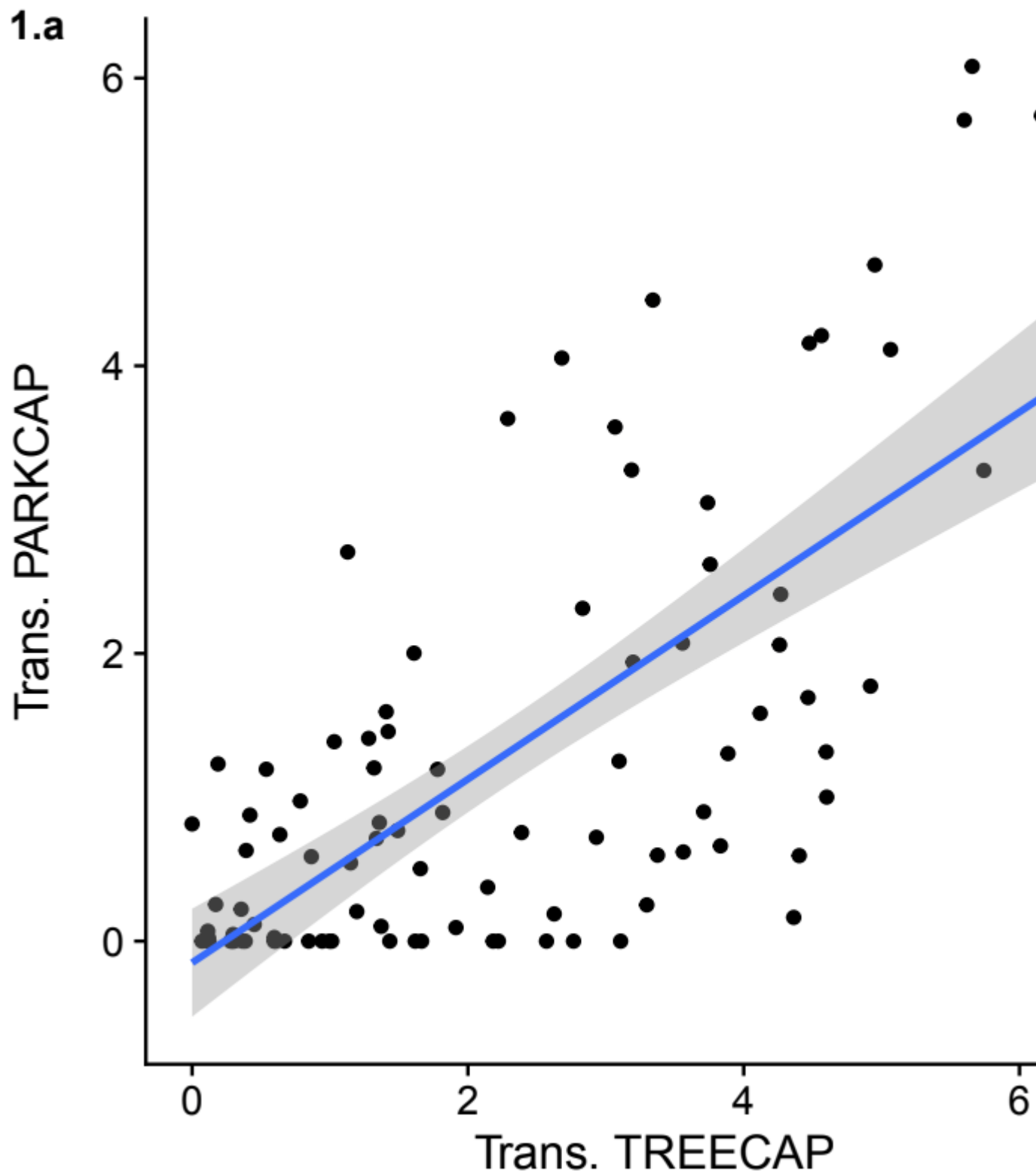


Figure 1. Graphical association of indicators of Green Space for the city of Sao Paulo

A visualization of the relationship between these three indicators illustrates their complementary nature. Figure 1 shows scatterplots of the three transformed indicators, compared in a pairwise form, including a trend line of their relationships. Figure 1.a shows that the TREECAP and PARKCAP indicators are positively associated. In other words, the

provision of tree canopy cover per person is positively associated with the provision of urban parks in the city of Sao Paulo. While this might seem like a very logical relation, its important to consider that the presence of Tree Cover is not exclusive to urban parks, and in fact some urban parks, like plazas or monumental spaces, might not provide tree cover at all.

Another potential source of difference between the TREECAP and PARKCAP indicators is related to the specific elements that they are able to measure. For instance, while the tree cover indicator provides a broad indication of the presence of areas with accumulated tree canopy in cities, it cannot distinguish between the public and private spaces where this vegetation is located, a key aspect when access and equity is considered. Figure 2 exemplifies this issue, illustrating that much of the city's tree cover occurs outside official parks, in what could be private areas, or vegetated undeveloped land.

In other cases, indicators are less closely aligned. In Figure 1.b, which compares the TREECAP and the STREECAP indicators, the association between the two is almost non-existent, suggesting that the indicators measure very different aspects of the urban vegetation, due to the nature of their methods. Whereas TREECAP is able to identify and measure areas of tree cover as small as 90m², STREECAP is able to measure individual trees and linear green spaces at a much more granular level. This difference highlights the need to fully understand the nature of the indicators that are being used and which component of a city's greenness is being measured.

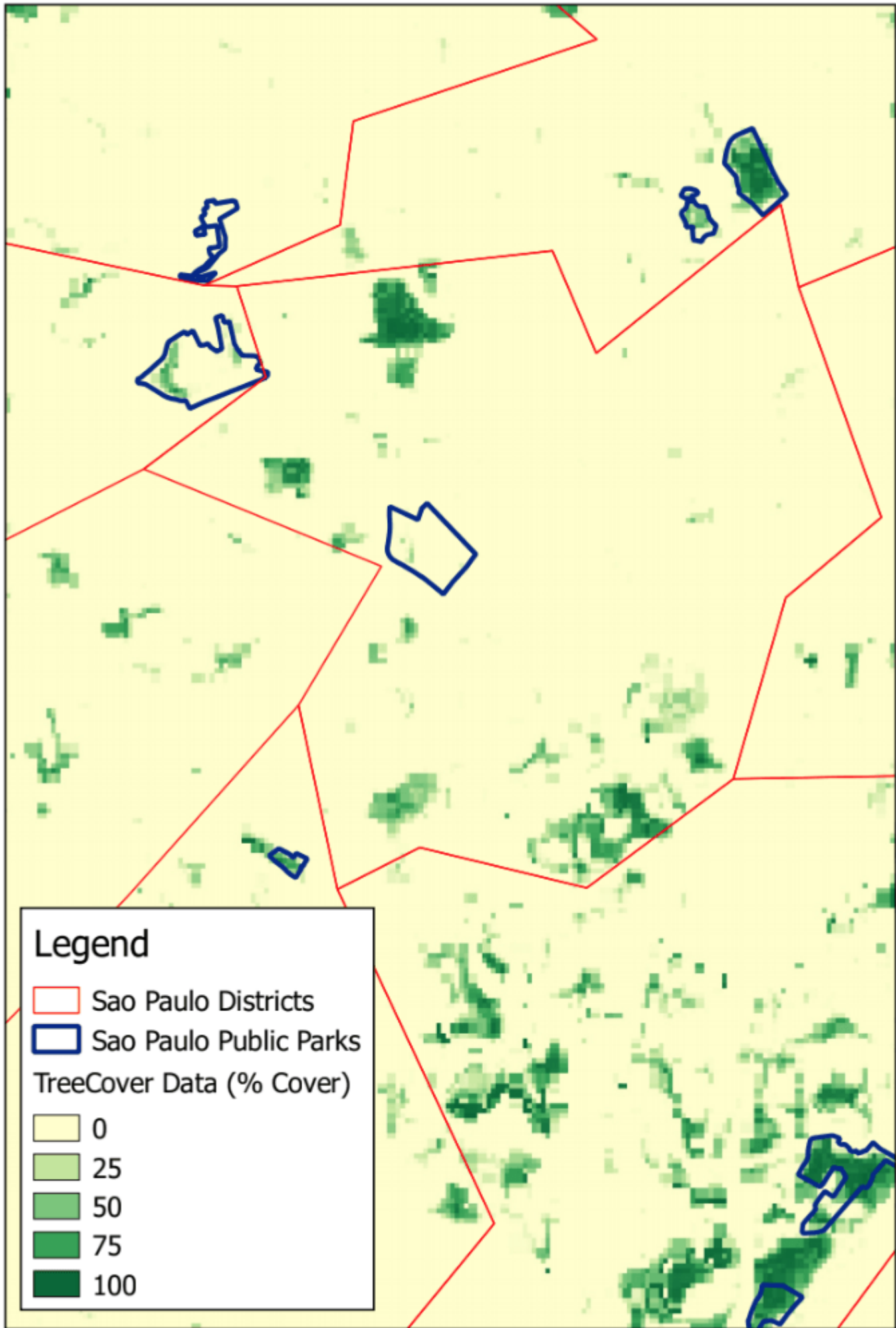


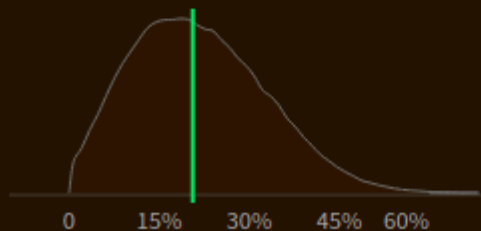
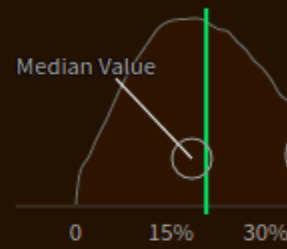
Figure 2. Map of tree cover as it relates to public parks in Sao Paulo.

In summary, even though the UESI uses a remote sensing approach to measure green spaces, a more comprehensive analysis of urban vegetation should involve the use of multiple complementary measures. The use of large-scale remote sensing datasets should be complemented with administrative records of the managed parks and vegetation, in order to provide complete information about the state of a city's vegetation. Unfortunately, this integration faces several barriers, especially in developing countries, where access to remote sensing imagery and the construction of local repositories both entail additional costs and human capacity. Attention to new methods and databases that can generate these indicators – such as the Global Forest Change Dataset²⁹, or the Treepedia project from MIT-Senseable Lab (see Box 2 for more details on this project) – could help overcome some of the existing barriers for obtaining quality and policy relevant data.

Box 2. Treepedia Case Study

A recent project from the MIT Senseable Lab fills an important data gap about green space in urban environments. Its Treepedia Project uses a multi-step computer vision algorithm to quantify the percent of tree cover along city streets. The algorithm leverages streetscape images from Google Street View to quantify and create a measure of a city's greenness, in their Green View Index³⁰. The project creates a source of data that academics, practitioners and decision-makers can use to evaluate the state of the urban vegetation from a citizen's perspective. In fact, the Treepedia project has purposefully centered on streetscapes, and not on large parks, in the hopes of raising awareness about a less explored but very relevant component of green space in cities.

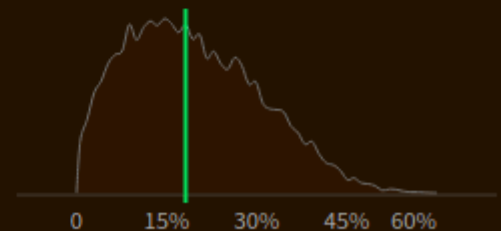
Compare Differences



Amsterdam

Green View Index ● 20.6%

Population Density 4,908/km²



Boston

Green View Index ● 18.2%

Population Density 5,344/km²

Figure 3. Results of Treepedia's Green View Index for the cities of New York, Paris, London and Los Angeles. Available at: <http://senseable.mit.edu/treepedia>.

The Green View Index has been calculated for 27 cities, including many UESI cities, such as Amsterdam, Johannesburg, London, Los Angeles, New York, Paris, Sao Paulo, Singapore, and Vancouver, as shown in Figure 3. Unfortunately, a straightforward comparison of the Green View Index and the UESI green space indicators would not be accurate, due to the need to reconcile the boundaries of analysis and the different levels of data aggregation – currently the Treepedia project only has information at a city-level. Future iterations of the Green View Index might allow for a more disaggregated calculation that would then enable neighborhood-level comparisons, and a deeper understanding on the state and types of vegetation within urban landscapes.

Like all measures of urban greenness, the Green View Index should be interpreted with some caveats in mind. In addition to some limitations associated with the method itself, two considerations are particularly relevant. The first is that the Index is limited strictly to streetscapes and available only for cities that have consistent street-level imagery captured by Google Street View, which could limit its use for some cities in developing countries. Additionally, like most remote sensing approaches, the Index is not able to distinguish between the private and public provision of greenness within a city. In other words, the Index does not shed light on how equitable or accessible green space is to a city's citizens. However, even with its limitations, the Index provides an important and complementary measure of the greenness of a city, particularly as it highlights the experience that the citizens can have of the urban landscape³¹.

In addition to exploring methods to identify and quantify urban green spaces, researchers have attempted to analyze how different forms of urban green space impact the city environment and urban citizens. Ekkel and Vries suggest that it is quite common for health-related studies to only consider green spaces above a minimum size³². Positive associations between green space and residents' well-being have been found in studies that focus on green spaces of at least 500 square meters (m²)³³. However, the role of small and consistent green spaces – such as street trees – cannot be discarded, as other studies have also found positive associations between these streetscapes and health indicators³⁴.

Recent papers have also explored the relationship between different types of green spaces and urban heat island (UHI) mitigation. Xi and Ratti (2008) applied innovative techniques using Google street-view images as a way to measure the shade and cooling benefits of urban street trees in Boston³⁵. Park et al. found that linear green spaces – lines of vegetation planted in one or two rows – appear to have no significant relationship on UHI reduction, while polygonal green spaces of at least 300 square meters, with 2300 cubic meters of vegetation cover volume, could reduce UHI by 1°C in their study area³⁶. Yang et al. also found that the composition and configuration of green spaces affected the distribution of land surface temperature, though this effect varied across different seasons, and with the size and shape of urban green spaces, among other factors³⁷.

Other studies analyze the role of different types of vegetation configurations play in providing the benefits of green space. A study by Shashua-Bar et al. suggests that tree shade reduces thermal stress more than grass alone³⁸. Considering the water needed to maintain

different types of vegetation – grass has a greater demand for water than trees, for instance – shade trees reduced thermal stress more efficiently than the combination of trees and grass, or grass alone. Similarly, a study of green spaces on roofs (or green roofs) by Yang et al. found that trees remove more air pollutants than short grass or tall herbaceous plants³⁹.

The UESI draws its Tree Cover indicators from the Global Forest Change 2001–2016 (Hansen et. al. 2013) dataset⁴⁰. While originally developed as a tool for large landscape observation, this dataset provides a meaningful and refined analysis of green spaces. It measures the presence of trees at least 5 meters tall, in line with some studies that suggest that trees provide additional benefits than other forms of vegetation, such as grass or shrubbery. Other studies (Wang, 1998; Iverson and Cook, 2000)^{41,42} have also utilized large-scale data — in these examples, Landsat data — to measure urban tree cover. The specific indicators calculated for this issue area aim to represent both the evolution in the presence of tree cover in a city over the last 15 years (Tree Canopy Cover Loss), as well as the physical existence of these green spaces in relation to the population living in specific neighborhoods (Tree Cover Per Capita). The Tree Cover Deficit indicator, defined as the amount of tree cover required to reach the minimum target of 15 square meters of tree cover per capita, is used to assess equitable access to tree cover by income group in each city.

Results

The results of the green space indicators suggest that there is an uneven distribution of tree cover throughout the analyzed districts of the 162 UESI cities, with most districts falling into the lower end of the range. An analysis of the Tree Canopy Cover Loss indicator across all the districts reveals a mean district Tree Canopy Cover Loss of 4.2 percent, and a median loss of 0.44 percent. This indicates a heavily skewed distribution, where most districts have a very small proportion of Tree Cover Loss, while a handful of other districts have very high values of Tree Cover Loss. Only 0.05 percent of the districts had lost 100 percent of their tree cover, while around 32 percent of the districts had not experienced any tree cover loss. This distribution can be also seen when the data is aggregated at the city level. Four cities from the UESI had the highest average Tree Canopy Cover Loss of all evaluated cities, at more than 20 percent: Vientiane (28.63 percent), Coimbra (25.8 percent), Fortaleza (25.8 percent), and Bangalore (21.4 percent). The other UESI cities lost less than 20 percent of their tree cover over the last decade, with 52 cities losing less than 1 percent of their tree cover.

The Tree Cover per capita indicator has a very similar distribution, with a mean value of 1,364.8 m² and a median value of 48.52 m². In fact, about 54.48 percent of all districts within the 162 UESI cities have amounts of tree cover per capita greater than the 15 m² per capita target, though many cities have at least one neighborhood that has 0 m² of Tree Cover per person. An analysis at the city level provides a complementary perspective: only 34 cities have an average tree cover per capita values below the defined target, with 3 cities – Reykjavík, Nouakchott and Kabul- virtually having no measurable tree cover, followed by Lima as the city with the lowest average tree cover area per capita, 0.12 m². Fifty-two other UESI cities have tree cover area values below 1m² per person.

Another way to look at the Tree Cover per capita indicator is through its inverse, Tree Cover Deficit, the average amount of tree cover that citizens in each neighborhood are lacking to reach the 15 m² per capita target. This analysis provides interesting insights and a different perspective on the distribution of tree cover for the UESI cities mentioned before. The tree cover deficit calculated at the city level shows that most cities have a total amount of tree

cover that could provide at least 15 m² of green space to all its citizens, with only 34 cities having a tree cover deficit. However, if we considered the deficit within each district, only 27 cities have districts that all contain sufficient tree cover to provide 15 m² to their residents. This difference in results shows the importance of conducting spatial-explicit analyses in order to highlight unequal neighborhood-level distributions within cities that score well on average.

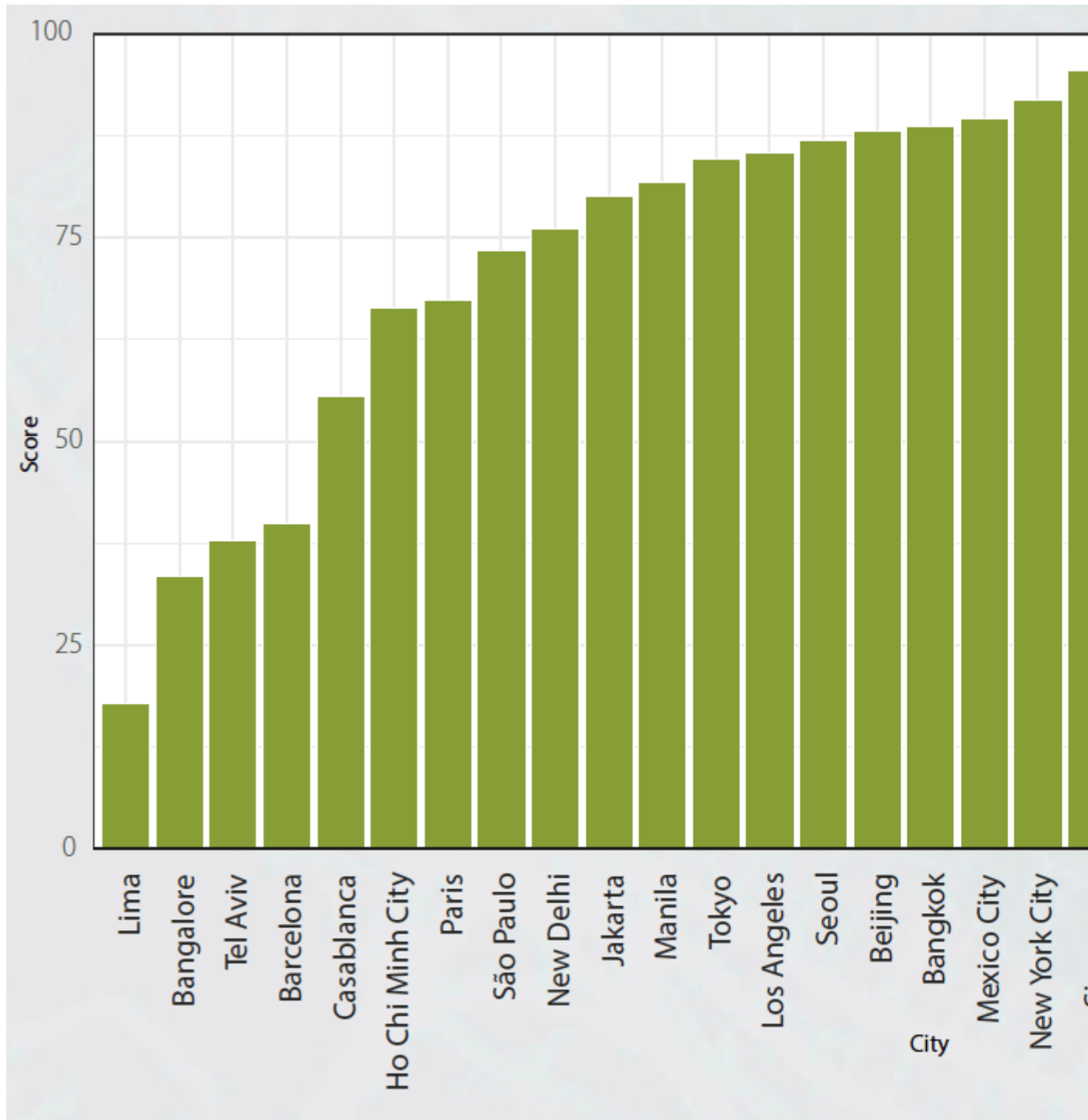


Figure 4. Proximity to Target Scores for Tree Cover per Capita for UESI pilot cities. Higher performing cities are those that are closer or at 100, while lower performing cities are closer to 0.

As with any indicator and dataset, there are some caveats and limitations to be considered. The first and probably most relevant limitation is associated with the 30 x 30 meters per pixel (or 900 m²) spatial resolution of the dataset. This resolution may limit the detection of small green spaces or areas with trees below 5 meters of height, which could be providing some meaningful benefit to citizens. Finer-resolution data are now becoming available and could enable more detailed analyses; for instance, the US Department of Agriculture's urban forest dataset covers 17 cities across the U.S. at a 3-meter spatial resolution. Similarly, this indicator will not include most streetscape components, such as street trees and linear gardens; while these elements might have a more limited provision of benefits than trees, their impact should not be fully discarded. Box 3 describes how Singapore, for instance, has leveraged linear gardens to add more green space to the city.

Box 3. Highrise Greenery in Singapore.

Singapore has lost 95 percent of its primary forest since 1819, when the British first established a colonial outpost here. In recent years, Singapore has also experienced severe secondary forest losses. As a city-state with fast economic development and population growth, land use changes and deforestation are almost inevitable. In 1967, shortly after its independence, the Singapore government launched the “garden city” campaign, a nationwide movement to promote tree-planting and greening. Since then, the government has actively promoted innovative ways to incorporate more greenery into Singapore's rapidly evolving urban landscape.



In 2009, the Urban Redevelopment Authority (URA), Singapore's national urban planning agency, introduced the Landscaping for Urban Spaces and High-Rises (LUSH) program. Through a series of initiatives and regulations, this program encourages planting of accessible greenery in the high-rise urban environment. Noticeably, LUSH's Landscape Replacement Policy mandates that developers mitigate construction-related losses of green space by incorporating "Landscape Replacement Areas" into their new buildings. These areas refer to a landscaped space on the first or upper levels of the development with its total area equivalent in size to the development site's footprint. The LUSH programme was then extended in 2014 to cover more geographical areas and development types under LUSH 2.0.

In November 2017, URA updated the LUSH program with its third iteration, injecting more flexibility to the Landscape Replacement Area regulations. Under LUSH 3.0, vertical greenery, extensive green roofs, and rooftop urban farms qualify as Landscape Replacement Areas. New Green Plot Ratio standards are also established to ensure a sufficient density of greenery in private developments.

Box 4. Environmental Inequity at the Neighborhood Level: The Case of Westhaven, Montreal

Montreal (Canada) is blessed with a variety of green spaces — from large urban parks, to green alleyways, local public parks, communal gardens, and street trees. These amenities are essential for addressing certain challenges related to urbanization, including the impacts of heat island and flooding, both of which are becoming more prevalent in the city of Montreal⁴³. However, as highlighted by the UESI and analyzed in the literature,⁴⁴ Conseil Régional de l'Environnement de Montreal. 2007. *Le Verdissement Montrealais Pour Lutter Contre Les Ilots De Chaleur Urbains, Le Rechauffement Climatique Et La Pollution Atmosphérique* green space is not distributed equitably across neighborhoods in the city. Many socio-economically disadvantaged neighborhoods have less access to quality green space in Montreal, suggesting an issue of environmental inequity. However, geospatial maps that compare environmental performance between neighborhoods may overlook inequities in access to green space *within* neighborhoods.

According to the UESI, Notre-Dame-de-Grace (NDG) is one of the greenest neighborhoods in Montreal, particularly in regards to tree coverage. However, field research, discussions with community organizers, as well as in-depth literature review has brought to attention that green space is *not* distributed equitably within NDG. As Steve Charters from NDG Community Council states, there are certain "pockets" of disadvantaged areas within the neighborhood that are underserved with respect to green space⁴⁵. This study examines the case of Westhaven, a low-income and socially isolated community within NDG that has disproportionately less greenery than the rest of the neighborhood.

A Socially and Geographically Isolated Community

Right at the western tip of NDG lies an isolated wedge of land, tucked in between a highway and train tracks. Originally designed to house returning soldiers and their families after World War 2, Westhaven quickly became home to immigrants and low-income individuals seeking cheap housing⁴⁶. Residents normally stay long enough in their apartment to save money, and then upgrade into a new neighborhood — making it challenging to form and sustain close

relations with neighbors. What was once a tight-knit, family-oriented neighborhood has become increasingly disconnected⁴⁷.



Figure 5. Image of one of the vacant green lots in the Westhaven neighborhood. Photo courtesy of Genevieve Westgate.

A Community Facing Multiple Scales of Inequity

The residents of Westhaven face major challenges in the social, economic and environmental spheres. The share of low-income families is 2.5 percent higher than the average for the Island of Montreal, while the share of unemployed people in Westhaven reaches 16.1 percent, compared to 8.8 percent for the Island⁴⁸. Residents also face challenges relating to inadequate housing, food insecurity and low access to education. Furthermore, the community has disproportionately less green space than the rest of the neighborhood⁴⁹, with one local park on the other side of a train track (which makes it hard to access) and one green vacant lot that is accumulating garbage and hosting criminal behaviors at night (see Figure 5)⁵⁰. The alleys are covered with pavement and absent of vegetation, contributing to a higher level of UHI in the area⁵¹. The residents have voiced that they do not have a public green space that they feel meets *their* needs, either for social or physical activity. Many adolescents expressed that their desires for a basketball court, while some adults wish for a community garden or a dog park⁵².

Green Space, Health and Well-Being

Why is having green space important for the community? The literature has widely acknowledged the fact that providing attractive green space may encourage people to spend more time outdoors and facilitate physical activity, even if it is only at a light level⁵³. Increased physical activity has been shown to improve health outcomes, including obesity and cardiovascular health. Furthermore, access to green spaces may have a positive restorative effect on mental health, providing a buffer against stressful life events, reducing anxiety and improving cognitive function⁵⁴. Green spaces also provide a place where people can gather, interact and form positive relationships with their neighborhoods, improving community cohesion⁵⁵. Given the myriads of challenges that this area is facing, these benefits could be especially beneficial to the residents.

NDG Community Council Project: *Planning for a Greener, More Active Community*

Recognizing the potential of green space in addressing issues relating to social isolation and community health and well-being, the NDG Community Council launched the *Planning for a Greener, More Active Community* project. The main objective is to increase green space, improve transit and make the neighborhood more walkable and safe — to improve the overall health of the residents⁵⁶. To achieve their goals in a way that meets the needs of the residents, the council will first and foremost engage with the community, by creating events and going door-to-door to get to know the residents and get their input on the project. Once they have an understanding of the pressing needs of the community, they will relay their observations and analysis to the regional public health office, that, if approved, will give them funding to implement local initiatives. The council explains that the projects will be of a small-scale — such as expanding sidewalks, adding more greenery, creating safe public spaces, and securing the railway crossing — such as to not push these renters out of the neighborhood through the process of “eco-gentrification.” The hope is that by making these micro-changes to the neighborhood, the community will become more active and socially engaged, improving health outcomes and fostering social inclusion and feelings of belonging.

The Way Forward

In sum, despite the fact that NDG has higher green coverage than the Montreal average, there are “pockets” of underserved areas, like Westhaven. This may not be so evident for policy-makers that analyze maps of neighborhood environmental performance. As such, careful attention must be paid when observing the UESI so as to not overlook variations within neighborhoods. It may be useful to use satellite view on the portal to get a better sense of disparities beneath neighborhood rankings. It is *essential* for policy-makers to understand and visualize these inequities, so they can propose environmental design plans to promote social inclusion and healthy lifestyles, which adequately represents the needs of the population.

Another element that affects the results of the Tree Cover per capita indicator is the population distribution, and the selected boundaries of the analysis. While the analysis aims to analyze the tree cover distribution around urban areas, the physical boundaries and disaggregation have been defined according to the administrative boundaries of the city (see Box 4 for a discussion of intra-neighborhood variation in tree cover). This selection, while necessary in order to combine socioeconomic and environmental datasets, does not distinguish between the strictly urban areas, peri-urban areas, and rural areas located in the periphery or in the middle of the city itself. As a result, some of the districts might incorporate areas with heavy tree cover and very low population density, something that is reflected in some of the very high Tree Cover Per Capita results for some districts, particularly those of significant extent, such as those in Chinese cities.

Tree Cover and Equity

Using the approach detailed in the *Equity and Social Inclusion Chapter*, we performed an analysis comparing distributional equity of both income and Tree Cover per Capita⁵⁷. The results of this analysis are exemplified in Figures 5 and 6 for a select number of UESI cities.

Figure 6 provides a graphical representation of Tree Cover per Capita for select UESI cities, based on the construction of Environmental Concentration and Income Lorenz curves. The position of the curves relative to a 45 degree line, which represent a scenario of perfect equity, provides information about the segments of the population in which the environmental outcome – Tree Cover per Capita – is unequally allocated. For example, the position of the Concentration curve below the 45 degree line for cities such as Johannesburg and Singapore, indicates that there is more tree cover per capita allocated to those with more income. To the contrary, the position of the curve above the 45 degree line in cities like Sao Paulo, indicates that there is more tree cover per capita available for with lower income.

For many cities, the concentration curve crosses the 45 degree line of perfect equity. This case suggests that within a city, sectors of the population with different levels of income might experience different relationships with Tree Cover per Capita allocation. For example, in Copenhagen, the Tree Cover per Capita concentration curve presents two pockets of inequity, one located below the equity line, affecting the poorest citizens, and one above below the equity line, benefiting a segment of wealthier citizens. These changes in the relationship between and environmental burden and different sectors of the population can help identify especially vulnerable sectors of the population and help policymakers respond to their particular situations.

A numeric quantification of the inequality in distributions of Tree Cover Deficit and Income, derived from the curves in Figure 6, is summarized in Figure 7. The quadrant plot presents the UESI's proposed typology that categorizes the relation between the environmental inequality and income inequality, using the Environmental Concentration Index (ECI) and the Gini Coefficients respectively (see the *Equity and Social Inclusion Profile* for a more detailed description of this plot). The results indicate cities are spread through different levels of income inequality, as indicated by the Gini coefficient, and that environmental inequality is also prevalent across most UESI cities.

Tree Cover Per Capita Distribution

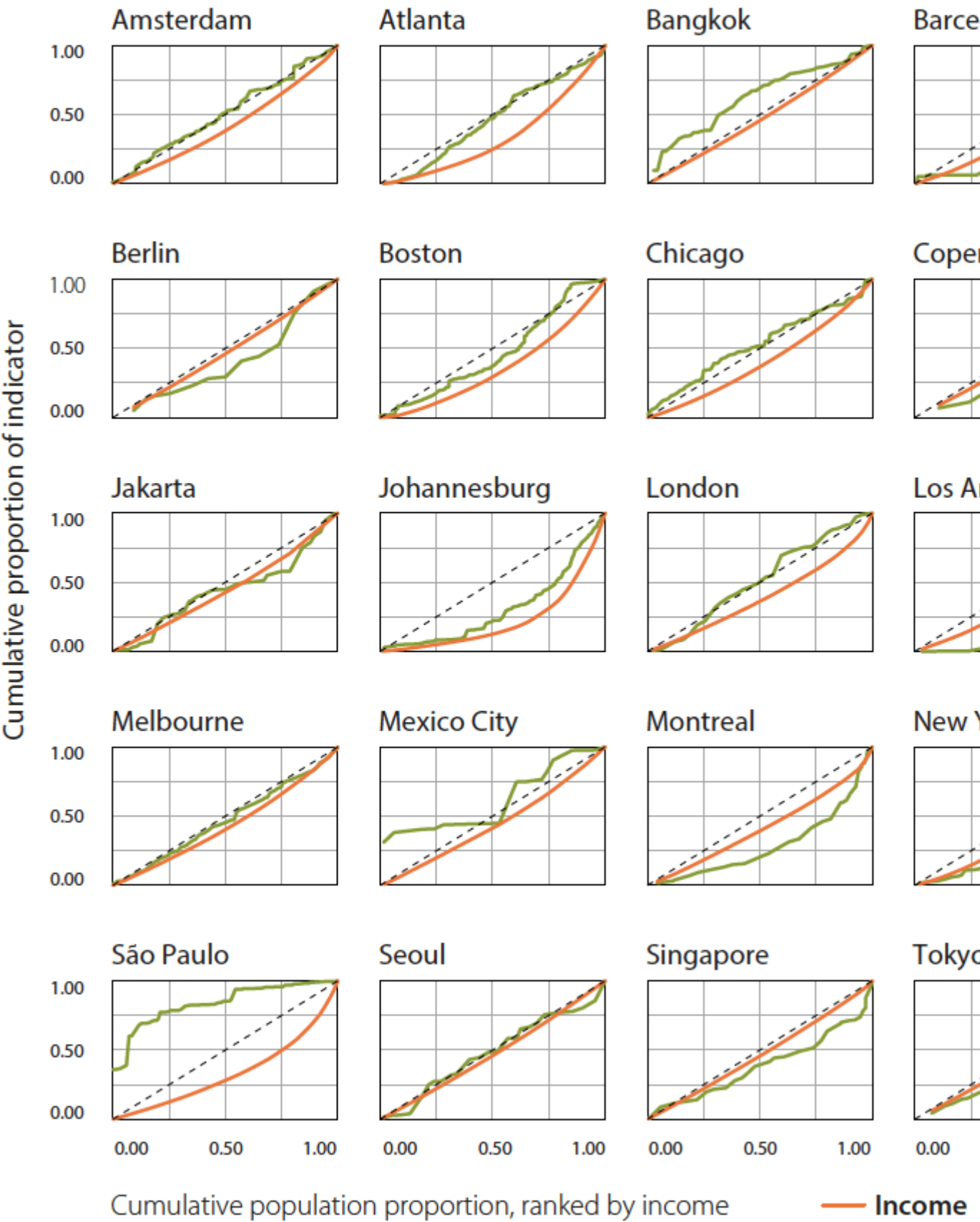


Figure 6: Environmental and income distribution curves for selected UESI cities. These plots show the distributions of Tree Cover per Capita (e.g., the concentration curve in blue) and income (e.g., the Lorenz curve in red) throughout city neighborhoods. Deviations from the dotted line (e.g., the line of perfect equity) illustrate cities that are less equitable in their distribution of Tree Cover per Capita. Concentration curves above the line of equity indicate the environmental burden is more heavily allocated to those with less income; concentration curves below the line of equity indicate that the environmental burden is more heavily allocated to those with greater income. (See the [Equity and Social Inclusion Profile](#) for a more detailed description of this plot and the [Cities Page](#) for a full exploration all cities' environmental and income distribution curves)

The top left quadrant (Low Gini and positive ECI) includes cities such as Albuquerque, Los Angeles, Brussels, Hamburg, and Seoul, where the Tree Cover per Capita is more heavily allocated to the richest income earners in those cities. While these cities have low income inequality, the environmental pressure falls hardest on low-income populations — who are negated the benefits of access to green space at the same level as other citizens — potentially creating an additional economic pressure on the lowest-earners of the city and increasing the gap between poorer and richer citizens. The top right quadrant (low Gini and negative CI) includes cities such as Malaga, London, and Sao Paulo, where the Tree Cover per Capita is more heavily allocated to the lowest-income earners of city. In these cities, the inequality of the Tree Cover per Capita does not actively aggravate the relatively low income inequality throughout the city, because the poorer citizens don't need to spend economic resources to gain access to tree cover or green spaces.

Cities in the bottom right quadrant, such as Panama City, Istanbul, or Kyiv are those where the tree cover is more heavily allocated to the lowest-income earners of the city, thus potentially allowing easier access to this green spaces, but have high levels of income inequality which creates economic pressure. Finally, the cities in the lower left quadrant (high Gini and negative ECI), such as Johannesburg, Lima or Caracas, have both high income inequality and high environmental inequality. In other words, the unequal allocation of tree cover could compound the city's income inequality, exacerbating the situation of the lowest income-earners and increasing the gap between poorer and richer citizens.

Finally, it is worth mentioning that while the ECI and Gini values are relevant summary indices to evaluate inequality in the distribution of an environmental outcome, there are some limitations to be considered (see the *Equity and Social Inclusion Profile* for a more details). The interpretation of the ECI needs to be complemented with an analysis of the Environmental Concentration curves themselves and the data used for their construction. This process will allow the decisionmakers to have a more comprehensive picture of the specifics of their cities, both in terms of the allocation and the intensity of the environmental outcomes, as well as its relation with income to craft potential useful interventions to address these issues.

-

CONTENTS

- [Urban Tree Cover](#)
 - [Description](#)
 - [Results](#)

- [Tree Cover and Equity](#)
- Appendix
 -

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date: 12/05/2023


First name: Jo **Last name:** Appleyard

Organisation:
Christchurch International Airport Limited (CIAL)

On behalf of:
Christchurch International Airport Limited (CIAL)

Preferred method of contact Email

Attached Documents

Name	
CIAL submission on PC14	

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: Christchurch International Airport Limited (CIAL)

- 1 This is a submission on the proposed Housing and Business Choice Plan Change to the Christchurch District Plan (PC14).
- 2 CIAL could not gain an advantage in trade competition through this submission.
- 3 The specific provisions of PC14 that CIAL's submission relates to and the reasons for CIAL's submission are set out in **Appendix A** and **Appendix B** below.
- 4 CIAL's submission relates to the whole proposal. The general and specific reasons for CIAL's relief sought in **Appendix B** are set out in **Appendix A**.
- 5 CIAL seeks the following decision from the local authority:
 - 5.1 Grant the relief as set out in **Appendix A and B**;
 - 5.2 Grant any other similar or consequential relief that would deal with CIAL's concerns set out in this submission.
- 6 CIAL wishes to be heard in support of the submission.
- 7 If others make a similar submission, CIAL will consider presenting a joint case with them at a hearing.

Signed for and on behalf of Christchurch International Airport Limited by its solicitors and authorised agents Chapman Tripp



Jo Appleyard
Partner
12 May 2023

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APPENDIX A

Overview

- 1 Christchurch International Airport Limited (*CIAL*) welcomes the opportunity to submit on Christchurch City Council's (*CCC*) proposed Housing and Business Choice Plan Change to the Christchurch District Plan (*District Plan*) (*PC14*).
- 2 Christchurch International Airport (*Christchurch Airport*) is the largest airport in the South Island and the second-largest in the country. In planning terms, it is regionally and nationally significant infrastructure and plays a critical role in the local community and economy.
- 3 Christchurch Airport is located in the Christchurch District. Land use activities in the district affect, and may be affected by, airport operations and in particular noise from aircraft landing and taking off. Avoiding noise-sensitive land uses establishing and/or intensifying in areas which will be subject to noise levels of 50dB Ldn or greater is a key concern for CIAL.
- 4 In summary:
 - 4.1 CIAL supports recognition in PC14 of land exposed to 50dBA Ldn or greater as an "existing qualifying matter" and supports PC14 in so far as it does not allow residential intensification to take place within the 50dBA Ldn Air Noise Contour.
 - 4.2 However, the spatial extent of the 50dBA Ldn Air Noise Contour must be properly defined in PC14 as a clear signal of where noise sensitive development, including intensification, must be avoided.
 - 4.3 A comprehensive review process has been undertaken to remodel and update the 50dBA Ldn Air Noise Contour for Canterbury. As a result of that exercise the spatial extent of the 50dBA Ldn Air Noise Contour is different to that which was notified in PC14. PC14 should define all areas potentially subject to levels of noise of 50dBA Ldn or greater, based on the 2023 remodelled contours, in reliance on the best available technical information and should prevent intensification within that properly defined area.

About Christchurch International Airport

- 5 The activities at Christchurch Airport make a significant contribution to the social and economic wellbeing of the communities and economies of Christchurch, Canterbury, the South Island and New Zealand.
- 6 In 2018, just under 7 million travelling passengers, on a total of 109,307 aircraft movements, and their associated 'meeters and greeters', passed through

Christchurch Airport.¹ Combined activities saw between 25,000 and 30,000 people visiting Christchurch Airport every day. This is the most recent representative data (pre-COVID-19) but all projections indicate that passenger and visitor numbers will return and thrive.

- 7 Christchurch Airport is home to several international Antarctic science programmes and their associated facilities. Christchurch Airport is also the primary air freight hub for the South Island, playing a strategic role in New Zealand's international trade as well as the movement of goods domestically. On that basis, Christchurch Airport is a significant physical and economic resource in national, regional and local terms.
- 8 CIAL's core business is to be an efficient airport operator, providing appropriate facilities for airport users, for the benefit of both commercial and non-commercial aviation users and to pursue commercial opportunities from wider complementary products, services and business solutions.
- 9 Christchurch Airport has a competitive point of difference over other airports in New Zealand, Australia and many other parts of the world. It operates without curfew and is unrestricted as to the types of aircraft using it. This provides unique benefits to Christchurch Airport, and in turn the region, as Christchurch Airport can accommodate late arriving overseas flights and the US Antarctic Program, as well as associated fleet maintenance activities. The ability of the Airport to continue to operate 24 hours a day, 365 days of the year without restriction is integral to the future economic and social well-being of people in the three local authority districts in the region, the South Island and nationally.
- 10 The COVID-19 pandemic has significantly impacted the aviation sector, creating unprecedented disruption. Through the Government's International Air Freight Capacity (IAFC) scheme, funding has been provided to airlines for dedicated freight flights to ensure New Zealand's high value export products reach international markets. Christchurch Airport has played a critical role in the IAFC scheme and in New Zealand's ability to respond to and recover from the economic impacts of COVID-19, enabling freight services which keep the South Island's economy connected to the rest of the world and providing stability in uncertain economic times.
- 11 The IAFC scheme continues to grow as demand requires. Further, the tourism industry expects that New Zealand will be in high demand as a destination through the COVID-19 recovery phase.

**Resource Management (Enabling Housing Supply and Other Matters)
Amendment Act 2021**

National Policy Statement on Urban Development

- 12 The National Policy Statement on Urban Development (*NPS UD*) directs that local authority decisions on urban development are to be integrated with infrastructure

¹ Total in 2019 calendar year.

planning decisions,² and that planning decisions contribute to well-functioning urban environments.³

- 13 A well-functioning urban environment is one in which:
 - 13.1 infrastructure – particularly nationally significant infrastructure such as Christchurch Airport – is not adversely affected by incompatible activities; and
 - 13.2 urban growth is planned with infrastructure provisions in mind, recognising that the two run hand-in-hand.
- 14 While NPS UD Policy 3 directs councils to increase density and realise as much development capacity as possible in urban environments, Policy 4 allows district plans applying to tier 1 urban environments to contain modified building height or density requirements to the extent necessary to accommodate a qualifying matter.
- 15 Qualifying matters are defined in the NPS UD and section 77I of the Resource Management Act 1991 (*RMA*) and include:

any matter for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure.
- 16 As outlined above, Christchurch Airport is nationally significant infrastructure. The qualifying matter required to ensure its safe or efficient operation is the restriction of density in areas subject to aircraft noise of 50dBA Ldn or greater to density levels currently provided for in the District Plan.

Canterbury Regional Policy Statement

- 17 The efficient use and development of Christchurch Airport as a significant physical regional infrastructure resource is provided for in the CRPS, in both Chapter 5 (Land Use and Infrastructure) and Chapter 6 (Recovery and Rebuilding of Greater Christchurch).
- 18 Policy 6.3.5 of the CRPS:
 - 18.1 provides for the continued safe, efficient and effective use of regionally significant infrastructure;⁴
 - 18.2 provides for the provision of efficient and effectively functioning infrastructure;⁵ and

² Objective 6.

³ Policy 1.

⁴ CRPS. Objective 5.2.1(2g). Definitions: Regionally Significant Infrastructure includes Christchurch International Airport.

⁵ CRPS. Policy 6.3.5(3).

- 18.3 seeks to ensure that land use activities⁶ and new development⁷ are managed including avoiding activities that have the potential to limit the efficient and effective 'provision, operation, maintenance or upgrade of strategic infrastructure and freight hubs'.
- 19 The 'Principal reasons and explanation' for Policy 6.3.5 states: "*Strategic infrastructure represents an important regional and sometimes national asset that should not be compromised by urban growth and intensification... The operation of strategic infrastructure can affect the liveability of residential developments in their vicinity, despite the application of practicable mitigation measures to address effects... It is better to instead select development options where such reverse sensitivity constraints do not exist.*"
- 20 Objective 5.2.1(f) requires that "*development is located so that it functions in a way that ... is compatible with, and will result in the continued safe, efficient and effective use of regionally significant infrastructure*". Policy 6.3.9(5) requires that the location and design of rural residential development shall avoid noise sensitive activities occurring within the 50 dBA Ldn Air Noise Contour.
- 21 Consistent with the objectives and policies outlined above, Map A of the CRPS indicates urban areas in Greater Christchurch suitable for growth. This explicitly excludes land subject to the 50dBA Air Noise Contour.

**Resource Management (Enabling Housing Supply and Other Matters)
Amendment Act 2021**

- 22 The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 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, provided that the MDRS may be less enabling of development where a qualifying matter applies.⁸
- 23 As explained above, this includes a matter required to ensure the safe or efficient operation of Christchurch Airport as nationally significant infrastructure.⁹
- 24 Where a qualifying matter is already provided for in an operative district plan, it is defined as an "existing qualifying matter".¹⁰ The land within the 50dBA Ldn Air Noise Contour is recognised in the district wide objectives and policies of the District Plan as an area where new noise sensitive activities should be avoided. This includes policies to avoid potential reverse sensitivity effects on Christchurch Airport from incompatible land use activities.

⁶ CRPS. Policy 6.3.5(5).

⁷ CRPS. Policy 6.3.5(4).

⁸ Resource Management Act 1991 (RMA), s 80F(1)(a).

⁹ Resource Management Act 1991, s 77(1)(e): inserted by Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021, s 9.

¹⁰ Objective 3.3.12 in the Operative Christchurch District Plan provides that new noise sensitive activities within the 50dB Ldn Air Noise Contour and the 50dB Ldn Engine Testing Contour for Christchurch International Airport except in certain limited circumstances.

- 25 Accordingly, as identified by CCC, land subject to noise levels of 50dBA Ldn or greater is subject to an “existing qualifying matter” for the purposes of PC14.

Existing qualifying matters

- 26 The RMA provides a specific process for considering existing qualifying matters, such as the “*Airport Noise Influence Area Qualifying Matter*” proposed in PC14 (*Airport QM*).¹¹ Each of the relevant steps is outlined below.
- 27 It is important that the Airport QM is appropriately represented and provided for in PC14 and accurately shown on the planning maps to ensure residential development and/or intensification is not enabled in areas subject to aircraft noise levels of 50dBA Ldn or greater. This is necessary to safeguard Christchurch Airport operations and to protect the community from adverse amenity effects into the future.

Section 77K(1)(a) – Identify by location where an existing qualifying matter applies

- 28 There is a significant body of existing case law and policy that confirms the Airport QM applies to those areas of land which will be subjected to future aircraft noise levels of 50dBA Ldn or greater. While CIAL supports recognition of the Airport QM, based on the most recent technical information the spatial extent as notified in PC14 does not accurately reflect where residents will experience levels of aircraft noise of 50dBA Ldn or greater.
- 29 In short, the Airport QM must be explicitly recognised in PC14 and must apply to all residentially zoned land (current and future) within the operative 50dBA Ldn Air Noise Contour (shown in the CRPS and the District Plan) (*Operative Contour*) and the 2023 remodelled contours (as shown in Appendix A(i)) (*Remodelled Contours*).
- 29.1 As required by the Canterbury Regional Policy Statement (*CRPS*), there has been an ongoing technical process to remodel the Operative Contour with input from CIAL’s experts and Canterbury Regional Council’s (*ECan*) independent peer review panel (*Independent Panel*). The Remodelled Contours are agreed between CIAL’s experts and the Independent Panel and are highly relevant for the PC14 process. They represent the most recent and accurate evidence as to where aircraft noise effects of 50dBA Ldn and greater will be experienced in Christchurch and therefore should be taken into account in deciding where it is appropriate to allow residential development and/or intensification.
- 29.2 There are two versions of the remodelled contours, one using an Annual Average methodology and the other using an Outer Envelope methodology. Both methods are technically valid and the preferred approach for Canterbury has not yet been confirmed.

- 30 Accordingly, the proposed spatial extent of the Airport QM is demonstrated at **Appendix A(i)** and includes the outer extent of:

¹¹ RMA s 77K(1).

- (a) Operative Contour; and
- (b) Remodelled Contour (Annual Average); and
- (c) Remodelled Contour (Outer Envelope).

Remodelling process

- 31 Policy 6.3.11(3) in the CRPS requires certain processes with respect to remodelling the Air Noise Contours. CIAL engaged a team of independent experts in 2018 and, after being interrupted by COVID-19, provided draft updated contours to Canterbury Regional Council in 2021 for peer review the Independent Panel.
- 32 The review process has been rigorous and robust and CIAL's experts and the Independent Panel agree on the refined technical modelling approach, inputs and assumptions. The Remodelled Contours are now agreed and they represent the most accurate technical information about the geographical areas where 50dBA Ldn is expected to be felt in Canterbury.
- 33 The two modelling approaches tabled include:
 - 33.1 a 50dBA Ldn contour which models the annual average noise levels (*Annual Average*); and
 - 33.2 a 50dBA Ldn contour which models an outer envelope of the average busiest three month period on each runway (*Outer Envelope*) – this closely mirrors the way in which the current contours in the CRPS and the operative Plan were modelled.
- 34 The technical inputs and assumptions underlying both the Annual Average and Outer Envelope approaches were agreed between CIAL's experts and the Independent Panel. Both approaches are technically valid and CIAL has included both in the map at **Appendix A(i)** to ensure that the decision makers on PC14 have the full up to date information as to where aircraft noise effects will be experienced in Christchurch City.
- 35 PC14 as notified does include an area to form the geographical extent of the Airport QM. This indicates that CCC agree it is appropriate to limit intensification in areas potentially subject to 50dBA Ldn or above.
- 36 However, there is now a substantial body of up-to-date information prepared by independent experts through the remodelling process that indicates that the areas where people experience levels of noise of 50dBA Ldn or greater is different to that shown in PC14 as notified. CCC must now take into account the more recent Remodelled Contours in deciding where it would be inappropriate to allow residential development to intensify.
- 37 Accordingly, the Airport QM covers the land within the Operative Contour and the two options for the Remodelled Contour (Annual Average and Outer Envelope as shown in **Appendix A(i)**). This is an interim approach which is necessary to avoid potentially inappropriate development prior to the completion of the CRPS review.

The alternative effectively allows the horse to bolt – rendering the application of the Airport QM ineffective and potentially compromising community amenity and Airport operations.

Section 77K(1)(b) – Specify the alternative density standards

- 38 Controlling residential density is the key tool used in avoiding reverse sensitivity effects on Christchurch Airport and to address amenity effects for communities living in areas exposed to aircraft noise.
- 39 When the District Plan was reviewed in 2015, the Independent Hearings Panel (*IHP*) was required to interpret the relevant CRPS policies outlined above and determined that, although there is no absolute direction in the CRPS to avoid any further noise sensitive activities in existing residentially zoned land within the Operative Contour, there is still a need to evaluate whether to avoid or restrict such activities so as to give proper effect to Policy 6.3.5 and related CRPS objectives and policies.¹² The IHP recognised the need for an ongoing capacity to assess relevant reverse sensitivity and noise mitigation matters for residential intensification above a certain scale.¹³
- 40 The decision reinforces the position that density (amongst other things) was, and is, a key matter to address.
- 41 Furthermore, CIAL’s acoustic experts have consistently advised that, where there is sufficient land available elsewhere, residential activity should not take place in areas which will be subject to noise levels of 50dBA and above. There is plenty of land available outside the Operative and Remodelled Contours (both the Annual Average and Outer Envelope) in Christchurch which should be preferred for residential development and/or intensification. Recognition of the Airport QM and identification of its spatial extent on the planning maps would clearly signal this to plan users and CCC staff.

Section 77K(1)(c) – Identify why a qualifying matter applies to the areas identified under (a)

- 42 The use of “noise boundaries” is prescribed by New Zealand Standard NZS 6805:1992 “Airport Noise Management and Land Use Planning” (*the Standard*) and this concept is implemented across the country.
- 43 The 50dBA Ldn Air Noise Contour is the outer control boundary (*OCB*) used for Greater Christchurch and reflects the point at which land use controls are necessary to manage the establishment of noise sensitive activities in proximity to Christchurch Airport. This is required in order to:
- 43.1 ensure people are protected from establishing sensitive land uses in areas that are exposed to higher levels of aircraft noise which might disturb them or adversely affect their amenity and quality of life; and

¹² Decision 10 Residential (Part), Independent Hearings Panel, 10 December 2015, at [195].

¹³ Ibid, at [235].

- 43.2 protect Christchurch Airport from reverse sensitivity effects, enabling Airport operations to continue to support and benefit Christchurch, Canterbury and the South Island communities.
- 44 The Courts to date have repeatedly confirmed the importance of ensuring that the 50dBA Ldn Air Noise Contour is properly included in the planning framework to support good planning decisions in limiting density and to continue to protect the safe and efficient operations of Christchurch Airport. The case law is based on a substantial body of expert evidence, which explains that the 50dBA Ldn Air Noise Contour remains the point at which density constraints are required to protect Christchurch Airport.
- 45 The fundamental rationale in support of setting the point at which density constraints are required at the 50dBA Ldn Air Noise Contour has not changed since that case law. A proportion of the community will be highly annoyed by being exposed to aircraft noise at levels of 50dBA Ldn and above. In fact, the latest acoustics research indicates that levels of annoyance in communities are increasing.¹⁴
- 46 As case law has confirmed, the areas subject to levels of 50 dBA Ldn or greater represents an undesirable noise environment within which residents will be subject to adverse amenity effects and where new greenfield development and further intensification should be avoided. Furthermore, the Standard clearly recommends that, first and foremost, new noise sensitive activities should be avoided.¹⁵
- 47 New residential activity and intensification must be avoided on land potentially subject to noise levels of 50dBA Ldn to protect the amenity of residents, and to minimise reverse sensitivity effects and risks to operations at Christchurch Airport.
- 48 In making decisions on PC14 and the geographical extent of land subject to aircraft noise levels of 50dBA Ldn, CCC needs to take into account the most up to date information available relating to the Remodelled Contours.

Section 77K(d) – Describe in general terms for a typical site in those areas identified under (a) the level of development that would be prevented by accommodating the qualifying matter, in comparison with the level of development that would have been permitted by the MDRS and policy 3

- 49 CIAL is cognisant that some development capacity is theoretically prevented by accommodating the Airport QM. However, it is not realistic to assume that every residentially zoned site within the Airport QM area would take up the opportunity to develop in accordance with the MDRS. Furthermore, a significant portion of this land

¹⁴ As shown by the more recent studies reviewed by Marshall Day Acoustics in 'Community Annoyance Survey Literature Review'.

¹⁵ Section 1.1.4 recommends a minimum level of protection, but explicitly notes that local authorities may adopt stricter controls than the minimum specified; Section 1.4.2.1 recommends that, between the Outer Control Boundary and the Air Noise Boundary there should be no incompatible land uses; and Table 2 recommends that new noise sensitive activities are prohibited within the Air Noise Boundary.

contains additional practical constraints (such as heritage overlays) which limit the ability to take up MDRS regardless.

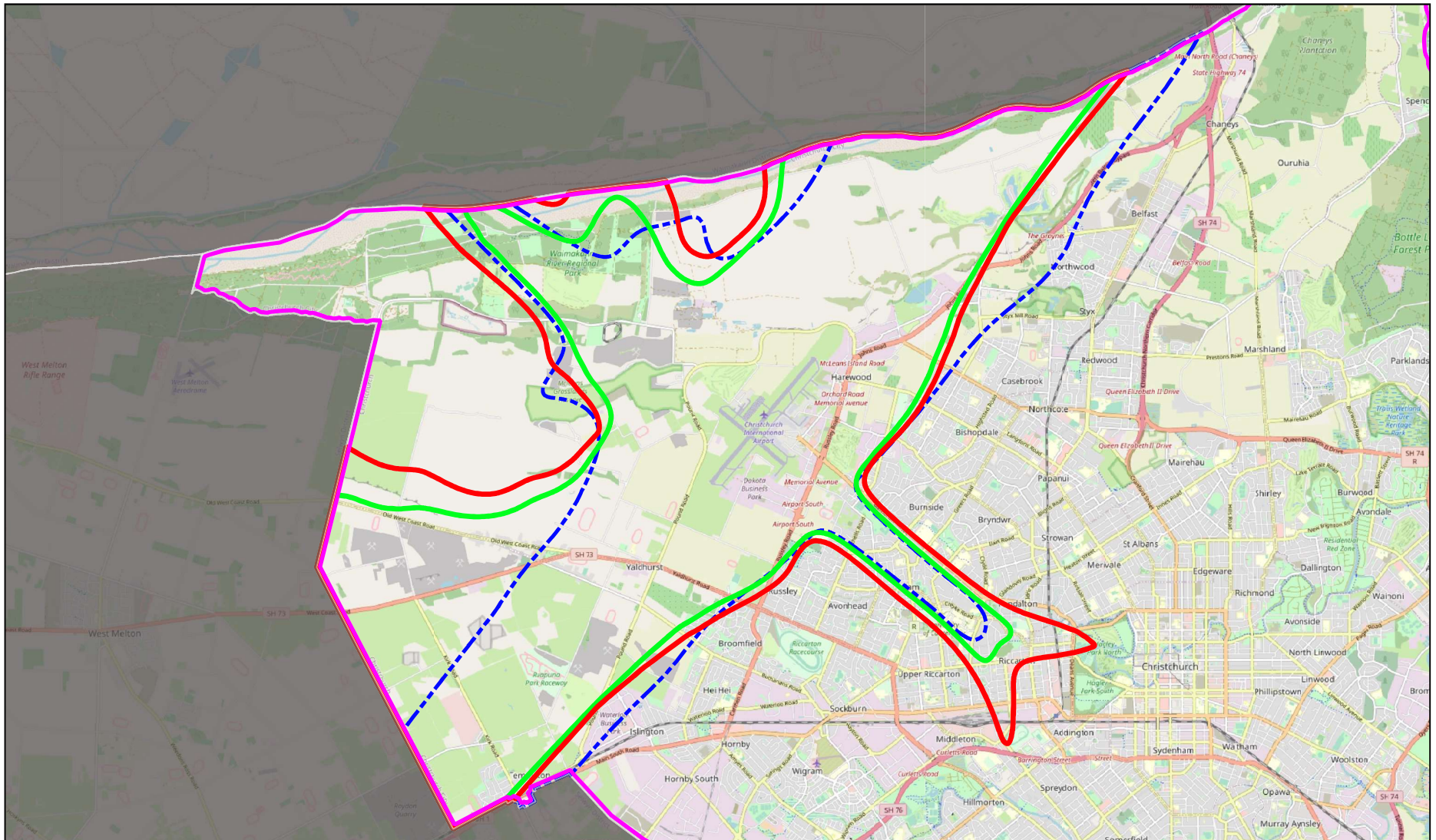
- 50 On the other hand, less enabling density standards are necessary to protect Christchurch Airport operations and avoid unreasonable amenity outcomes. Allowing intensification to the MDRS within the Airport QM area would expose a greater number of residents to aircraft noise, impacting their health and amenity and ultimately compromising the viability of Christchurch Airport operations.
- 51 There are existing residential areas, and the potential for new residential areas, outside of the Airport QM with development capacity in a more appropriate location. CIAL's acoustic experts have consistently advised that, where there is land available, it is preferable for residential development (and intensification) to take place outside the areas exposed to 50dBA Ldn or greater.
- 52 The RMA 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 Airport QM area.
- 53 In reality, the level of development prevented by accommodating the Airport QM is minimal when compared to the effects it is designed to address.

Conclusion

- 54 CCC has appropriately recognised that areas subject to levels of noise of 50dBA Ldn or greater are subject to an "existing qualifying matter" in accordance with the RMA.
- 55 However, for reasons set out in this submission, the geographical extent of the Airport QM must be included accurately on the Planning Maps as shown at **Appendix A(i)**. Furthermore, CIAL seeks that the relief as set out in **Appendix B** is granted, or alternatively that the Panel grant any other similar or consequential relief that would deal with CIAL's concerns set out in this submission.

Appendix A(i)

Airport Noise Influence Area Qualifying Matter



- ▭ 2023 remodelled 50dBA Ldn Air Noise Contour (outer envelope)
- ▭ 2023 remodelled 50dBA Ldn Air Noise Contour (annual average)
- Operative plan 50dBA Ldn contour (as shown on Map A of the CRPS)
- ▭ Christchurch City

Sources:

Marshall Day
<https://gis.ecan.govt.nz/arcgis/rest/services/Public/LURP/MapServer/4>
 Stats NZ
 Base map and data from OpenStreetMap and OpenStreetMap Foundation (CC-BY-SA). ©
<https://www.openstreetmap.org> and contributors.
 Produced on: 12/05/2023

APPENDIX B CCC PC14 Submissions and Relief

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

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

Suggested amendments and alternative drafting is shown in track change – CIAL's requested deletions are shown using ~~red strikethrough~~ and requested insertions shown using red underline.

Sub #	Provision	Position	Relief requested	Explanation
1.	General – Airport Noise Influence Area Qualifying Matter	Support in part	Plan Change 14 (PC14) proposes an Airport Noise Influence Area Qualifying Matter (QM). PC14 proposes to retain the existing operative District Plan (the Plan) zones and provisions beneath the QM. CIAL support this approach but note that a number of amendments are required to correct inaccuracies in rules, update relevant policies and to reflect the remodelled 50dBA Ldn Air Noise Annual Average and Outer Envelope contours. The specific relief sought is detailed in the following submission points.	See detailed submission points below.
2.	Planning Maps – The Spatial Extent of the Qualifying Matter	Support in part	Amend the spatial extent of the QM on the planning maps to show the outer extent of the updated remodelled 50dBA Ldn Air Noise Annual Average and Outer Envelope contours dated May 2023, and the operative contour, as illustrated on the Plan attached as Appendix A(i). Retain the operative District Plan residential zones beneath the contours, rather than apply the MRZ and HRZ.	<p>The PC14 planning maps show the spatial extent of the 50dBA Ldn Air Noise Annual Average contour as it existed in February 2022.</p> <p>Since that time, the final remodelling has been completed and the May 2023 Annual Average and the Outer Envelope contours are different to those from February 2022.</p>

Sub #	Provision	Position	Relief requested	Explanation			
				Given this, the spatial extent of the QM as shown on the planning maps requires amendment to cover all areas where sensitive activities may be subject to noise levels of 50dBA Ldn or greater. This, together with the retention of the existing relevant Plan rules, will ensure appropriate amenity outcomes for sensitive activities beneath the contour and to ensure the effective and efficient operation of Christchurch Airport.			
3.	Chapter 3 Strategic Objectives New Objective 3.3.7 Well-functioning urban environment	Support in part	Amend new objective 3.3.7 – Well-functioning urban environment as follows: a. 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;... <u>v. reduced density of development for sensitive activities where a Qualifying Matter applies.</u>	An amendment to objective 3 is required to recognise, at a strategic level, that the qualifying matters are a key contributor to well-functioning urban environments.			
4.	Chapter 6.1A Qualifying Matters	Support in part	Amend Table 1 – Qualifying Matters, as follows: <table><tr><td>Chapter 14 Residential</td></tr><tr><td>Safe or efficient operation of nationally significant infrastructure (Christchurch Airport)</td></tr><tr><td>14.4.1 – 14.4.4, <u>14.9</u>, 14.13, 14.14 Low Density Residential Airport Influence Zone and Airport Influence Density Precinct <u>Airport Noise Influence Area</u></td></tr></table>	Chapter 14 Residential	Safe or efficient operation of nationally significant infrastructure (Christchurch Airport)	14.4.1 – 14.4.4, <u>14.9</u> , 14.13, 14.14 Low Density Residential Airport Influence Zone and Airport Influence Density Precinct <u>Airport Noise Influence Area</u>	A correction is required to the description of the QM used in the table to align with the planning map notation and the relevant Restricted Discretionary activity rules of the Plan residential zones. A reference to Chapter 14.9 is required as the Residential Large Lot Zone (Gardiners Road) sits beneath the QM (see specific submission below).
Chapter 14 Residential							
Safe or efficient operation of nationally significant infrastructure (Christchurch Airport)							
14.4.1 – 14.4.4, <u>14.9</u> , 14.13, 14.14 Low Density Residential Airport Influence Zone and Airport Influence Density Precinct <u>Airport Noise Influence Area</u>							

Sub #	Provision	Position	Relief requested	Explanation								
5.	Chapter 6.1A Qualifying Matters	Support in part	<div>Amend Table 1 – Qualifying Matters, as follows:</div> <table><tr><th>Chapter 15 Commercial</th></tr><tr><td>Safe or efficient operation of nationally significant infrastructure (Christchurch Airport)</td></tr><tr><td>15.2.4.6 Policy – Strategic Infrastructure</td></tr><tr><td>15.4.1.1 P21 and 15.4.1.5 NC12– Town Centre Zone - Residential activity within 50 dB Ldn Air Noise Contour <u>or the Airport Noise Influence Area</u></td></tr><tr><td>15.5.1.1 P21 and 15.5.1.5 NC2 – Local Centre Zone - Residential activities within 50 dB Ldn Air Noise Contour <u>or the Airport Noise Influence Area</u></td></tr><tr><td>15.6.1.1 P19 – Neighbourhood Centre Zone - Residential activities within 50 dB Ldn Air Noise Contour <u>or the Airport Noise Influence Area</u></td></tr><tr><td>15.6.1.5 NC2 - Neighbourhood Centre Zone - Sensitive activities within the 50 dB Ldn Air Noise Contour <u>or the Airport Noise Influence Area</u></td></tr><tr><td><u>15.9.1.1 P10 - Commercial Office Zone - Preschool outside of the 50 dB Ldn Air Noise Contour or the Airport Noise Influence Area</u></td></tr></table>	Chapter 15 Commercial	Safe or efficient operation of nationally significant infrastructure (Christchurch Airport)	15.2.4.6 Policy – Strategic Infrastructure	15.4.1.1 P21 and 15.4.1.5 NC 12 – Town Centre Zone - Residential activity within 50 dB Ldn Air Noise Contour <u>or the Airport Noise Influence Area</u>	15.5.1.1 P21 and 15.5.1.5 NC2 – Local Centre Zone - Residential activities within 50 dB Ldn Air Noise Contour <u>or the Airport Noise Influence Area</u>	15.6.1.1 P19 – Neighbourhood Centre Zone - Residential activities within 50 dB Ldn Air Noise Contour <u>or the Airport Noise Influence Area</u>	15.6.1.5 NC2 - Neighbourhood Centre Zone - Sensitive activities within the 50 dB Ldn Air Noise Contour <u>or the Airport Noise Influence Area</u>	<u>15.9.1.1 P10 - Commercial Office Zone - Preschool outside of the 50 dB Ldn Air Noise Contour or the Airport Noise Influence Area</u>	<p>Policy 15.2.4.6 (Strategic Infrastructure) has been amended by Plan Change 5B and remains unchanged by PC14. CIAL supports the policy as it establishes a framework for the supporting rules within the relevant commercial zones that sit beneath the QM.</p> <p>A minor amendment is required to rule 15.4.1.5 to refer to the correct non-complying activity rule.</p> <p>The permitted and non-complying activity rules of the relevant commercial zones refer to the “50dB Ldn Air Noise Contour”. An additional reference to the Airport Noise Influence Area Qualifying Matter is also required to give effect to the policy framework and for the reasons outlined above in submission 2.</p> <p>The Commercial Office zone needs to be added to the table as there are two locations (Addington and Russley) where the zones sit beneath the QM.</p> <p>An amendment is required to the Mixed Use Zone (MUZ) to recognise that a small portion of the zone sits below the QM on the north side of Riccarton Road adjacent to the NZ rail line.</p>
Chapter 15 Commercial												
Safe or efficient operation of nationally significant infrastructure (Christchurch Airport)												
15.2.4.6 Policy – Strategic Infrastructure												
15.4.1.1 P21 and 15.4.1.5 NC 12 – Town Centre Zone - Residential activity within 50 dB Ldn Air Noise Contour <u>or the Airport Noise Influence Area</u>												
15.5.1.1 P21 and 15.5.1.5 NC2 – Local Centre Zone - Residential activities within 50 dB Ldn Air Noise Contour <u>or the Airport Noise Influence Area</u>												
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15.6.1.5 NC2 - Neighbourhood Centre Zone - Sensitive activities within the 50 dB Ldn Air Noise Contour <u>or the Airport Noise Influence Area</u>												
<u>15.9.1.1 P10 - Commercial Office Zone - Preschool outside of the 50 dB Ldn Air Noise Contour or the Airport Noise Influence Area</u>												

Sub #	Provision	Position	Relief requested	Explanation
			<p><u>15.9.1.5 NC2 – Commercial Office Zone - Sensitive activities within the 50 dB Ldn Air Noise Contour or the Airport Noise Influence Area</u></p> <p>15.10.1.1 P27 and 15.10.1.5 NC1 – Mixed Use Zone – Residential activities - Internal bedroom noise reduction, <u>and Residential activities within 50 dB Ldn Air Noise Contour or the Airport Noise Influence Area.</u></p>	See the related Zone-specific submissions below.
6.	Chapter 8 Subdivision Rule 8.6.1(a) and Table 1	Support in part	<p>Amend Rule 8.6.1.a. as follows: Minimum net site area and dimension</p> <p>a. Allotments in the Residential Suburban, Residential Hills, Residential Large Lot Residential, Open Space Metropolitan Facilities (golf courses, Riccarton Racecourse and Wilding, Western, Kearneys and Christchurch Parks) and the 50 dB Ldn Air Noise Contour or the Airport Noise Influence Area-Low Density Residential Airport Influence Zones shall have a minimum dimension of 16m x 18m.</p> <p>Amend Table 1 Minimum net site area – residential zones by deleting clause d and e that refer to the “Low Density Residential Airport Influence Zone” and the “Low Density Residential Airport Influence Zone – Airport Influence Density Precinct”.</p> <p>Amend Table 6 “Allotments with existing or proposed buildings” clauses a and b by removal of the references to the “Low Density Residential Airport Influence Zone”</p>	<p>The reference to the Low Density Residential Airport Influence Zones is an error and should, instead, refer to the QM.</p> <p>As above, these references are incorrect and are not required as the table retains the density standards for the Residential Suburban and Residential Suburban Density Transition zones that sit beneath the QM.</p> <p>As above.</p>

Sub #	Provision	Position	Relief requested	Explanation
			and the “Low Density Residential Airport Influence Zone – Airport Influence Density Precinct”.	
7.	Chapter 14 Residential Objectives and Policies Policy 14.2.3.2	Support	Retain new Policy 14.2.3.2 14.2.3.2 Policy - MDRS Policy 2 a. Apply the MDRS across all relevant residential zones in the district plan except in circumstances where a qualifying matter is relevant (including matters of significance such as historic heritage and the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga).	CIAL supports policy 14.2.3.2 for the reasons outlined above in submission 2.
8.	Chapter 14 Residential Objectives and Policies Objective 14.2.4 and Policy 14.2.4.1	Support	Retain Objective 14.2.4 and related policy 14.2.4.1 14.2.4 Objective - Strategic infrastructure a. Development of sensitive activities does not adversely affect the efficient operation, use, and development of Christchurch International Airport and Port of Lyttelton, the rail network, the National Grid and the identified 66kV and 33kV electricity distribution lines and the Heathcote to Lyttelton 11kV electricity distribution line, the state highway network, and other strategic infrastructure. 14.2.4.1 Policy - Avoidance of adverse effects on strategic infrastructure a. Avoid reverse sensitivity effects on strategic infrastructure including: i. Christchurch International Airport...	CIAL supports objective 14.2.4 and policy 14.2.4.1 for the reasons outlined above in submission 2.
9.	Chapter 14 Residential Objectives and Policies Policy 14.2.5.11	Support	Retain new Policy 14.2.5.11 14.2.5.11 Policy – Managing site-specific Residential Large Lot development a. Enable development within mixed density precincts in a way that:	CIAL supports policy 14.2.5.11 for the reasons outlined above in submission 2.

Sub #	Provision	Position	Relief requested	Explanation
			i. Within the Rural Hamlet area, avoids reverse sensitivity to airport activities and surrounding rural environment...	
10.	Chapter 14 Residential Residential Suburban zone and Residential Suburban Density Transition zone. Rule 14.4.1.3	Support in part	Amend Rule 14.4.1.3 RD30 as follows: a. Activities and buildings that do not meet one or more of the activity specific standards in Rule 14.4.1.1 (except for P16 - P18 standard ix. relating to noise sensitive activities in the 50 dB Ldn Air Noise Contour and <u>or</u> the Qualifying Matter Airport Noise Influence Area, refer to Rule 14.4.1.3 RD30 4 ; or P16-P19 standard x. relating to storage of heavy vehicles, refer to Rule 14.4.1.4 D2) for...	PC14 proposes to change the existing reference in the rule from RD34 to RD30. It is unclear why this is proposed and CIAL consider it to be an error. Given this, the reference to RD34 should be retained.
11.	Chapter 14 Residential Residential Suburban zone and Residential Suburban Density Transition zone. Rule 14.4.1.3	Support in part	Amend rule 14.4.1.3 RD34 as follows: a. The following activities and facilities located within the 50 dB Ldn Air Noise Contour and <u>or</u> the Qualifying Matter Airport Noise Influence Area as shown on the Planning Maps: i. Residential activities which are not provided for as a permitted or controlled activity <u>in this Chapter and which do not comply with:</u> <ul style="list-style-type: none"> • <u>14.4.2.1 Site density; or</u> • <u>14.4.2.3 Building height; or</u> • <u>14.4.2.4 Site coverage; or</u> • <u>14.4.2.5 Outdoor living space;</u> ii. Education activities (Rule 14.4.1.1 P16); iii. Preschools (Rule 14.4.1.1 P17); or iv. Health care facilities (Rule 14.4.1.1 P18) v. Visitor accommodation in a heritage item Rule 14.4.1.1 P30). (Plan Change 4 Council Decision subject to appeal)	All residential activities within the contour that are restricted discretionary, discretionary or non-complying trigger RD34, regardless of which chapter of the Plan contains the rules that made the activity not permitted. This is not the intention of the rule and CIAL consider that the RDA rule should only be triggered in circumstances where the non-compliance relates to the residential chapter and a limited set of built form standards.

Sub #	Provision	Position	Relief requested	Explanation
			(Plan Change 4 Council Decision subject to appeal) b. Any application arising from this rule shall not be publicly notified and shall be limited notified only to Christchurch International Airport Limited (absent its written approval).	
12.	Planning Maps Residential New Neighbourhood Zone Yaldhurst	Oppose	Amend the planning maps to remove Residential New Neighbourhood zoning and rename to Residential Suburban or Residential Suburban Density Transition zone.	A portion of land in Yaldhurst remains zoned Residential New Neighbourhood (RNN) on the proposed PC14 maps. As Chapter 14 is to be renamed Future Urban Zone (FUZ) under PC14, this would leave the RNN without any applicable zone provisions. CIAL presumes this is a mapping error and seeks that the land be identified as Residential Suburban or Residential Suburban Density Transition consistent with the surrounding residential land.
13.	Chapter 14 Residential Future Urban Zone Rule 14.12.1.3	Support in part	Amend rule 14.12.1.3 RD16 as follows: a. Activities and buildings that do not meet any one or more of the activity specific standards in Rule 14.12.1.1 (except for P8 to P10 activity standard ix. relating to noise sensitive activities in the 50 dB Ldn Air Noise Contour <u>or the Qualifying Matter Airport Noise Influence Area</u> refer to RD26; or P8 to P12 activity standard x. relating to storage of heavy vehicles refer to Rule 14.12.1.4 D2) for...	A reference to the Qualifying Matter is required to align with the approach taken for rule 14.4.1.3 RD30 (submission point 10).
14.	Chapter 14 Residential Future Urban Zone	Support in part	Amend rule 14.12.1.3 RD26 as follows:	As per submission point 11.

Sub #	Provision	Position	Relief requested	Explanation
	Rule 14.12.1.3		<p>a. The following activities located within the 50 dB Ldn Air Noise Contour <u>or the Qualifying Matter Airport Noise Influence Area</u> as shown on the Planning Maps:</p> <p>i. Residential activities which are not provided for as a permitted or controlled activity <u>in this Chapter and which do not comply with:</u></p> <ul style="list-style-type: none"> • <u>14.12.2.1 building height; or</u> • <u>14.12.2.2 site coverage; or</u> • <u>14.12.2.3 outdoor living space; or</u> • <u>14.12.2.14 minimum unit size; or</u> • <u>14.12.2.16 outline development plan; or</u> • <u>14.12.2.17 comprehensive residential developments;</u> <p>ii. Education activities (Rule 14.12.2.1 P8);</p> <p>iii. Preschool (Rule 14.12.2.1 P9); or</p> <p>iv. Health care facilities (Rule 14.12.2.1 P10);</p> <p>v. Visitor accommodation in a heritage item Rule 14.12.1.1 P25).</p> <p>b. Any application arising from this rule shall not be publicly notified and shall be limited notified only to Christchurch International Airport Limited (absent its written approval).</p>	
15.	Chapter 14 Residential Residential Large Lot Zone Rule 14.9.2.1	Support	<p>Residential activities are permitted within the zone (P1). Rule 14.9.2.1.ix specifies a minimum net site area of 2000m².</p> <p>RDA consent (RD2) required for residential units on sites which do not meet the density standard of rule 14.9.2.1</p>	<p>These rules are existing in the Plan, with the exception of the 2000m² rule which is inserted by PC14.</p> <p>Submission point 9 above supports new policy 14.2.5.11 which seeks to:</p>

Sub #	Provision	Position	Relief requested	Explanation
			by up to 10%. Such consents shall not be limited or publicly notified. Where the 10% margin is breached a fully discretionary consent is required (D4).	<p>“Enable development within mixed density precincts in a way that:</p> <p>i. Within the Rural Hamlet area, avoids reverse sensitivity to airport activities and surrounding rural environment...”</p> <p>This is both an enabling and avoidance policy. CCC’s position is likely to be that the avoidance occurs as a result of the 2000m2 rule which has been introduced by PC14.</p>
16.	Chapter 15 Commercial Town Centre Zone Rule 15.4.1.1 and 15.4.1.5	Support in part	<p>Amend Rule 15.4.1.1 P21 as follows: Residential activity – Activity specific standard: h. The activity shall not be located within the 50 dB Ldn Air Noise Contour <u>or the Airport Noise Influence Area</u> as shown on the planning maps.</p> <p>Amend Rule 15.5.1.5 NC2 as follows: Sensitive activities within the 50 dB Ldn Air Noise Contour <u>or the Airport Noise Influence Area</u> as defined on the planning maps.</p>	The permitted and non-complying activity rules refer to the “50dB Ldn Air Noise Contour”. An additional reference to the Airport Noise Influence Area Qualifying Matter is also required to give effect to the policy framework and for the reasons outlined above in submission 2.
17.	Chapter 15 Commercial Local Centre Zone Rule 15.5.1.1 (P21) and 15.5.1.5 (NC2) Neighbourhood Centre Zone Rule 15.6.1.1 (P19) and 15.6.1.5 (NC2) Commercial Office Zone	Support in part	As per submission point 16 above, references to the Airport Noise Influence Area need to be added to the identified rules.	As above.

Sub #	Provision	Position	Relief requested	Explanation
18	<p>Rule 15.9.1.1 (P10) and</p> <p>Chapter 15 Commercial Mixed Use Zone Rule 15.10.1.1 (P27) and 15.10.1.5 (NC1)</p>	Support in part	<p>Amend Rule 15.10.1.1 P27 by inserting a new activity standard f as follows:</p> <p><u>f. The activity shall not be located within the 50 dB Ldn Air Noise Contour or the Airport Noise Influence Area as shown on the planning maps.</u></p> <p>Consequential renumbering of existing activity standards that follow and rule reference renumbering as required.</p> <p>Amend Rule 15.10.1.5 N1 as follows: NC1 Any residential activity not meeting Rule 15.10.1.1 P27 (e) <u>or (f)</u>.</p>	A small portion of the MUZ sites beneath the QM on the north side of Riccarton Road adjacent to the NZ Rail line. Amendments to the rules are required for the reasons outlined in submission points 2 and 16 above.
19	<p>Chapter 13.6 Specific Purpose (School) Zone Appendices 13.6.6.1, 13.6.6.2 and 13.6.6.3</p> <p>Chapter 13.7 Specific Purpose (Tertiary Education) Zone Appendix 13.7.6.1</p>	Oppose	<p>Amend Appendices 13.6.6.1, 13.6.6.2, 13.6.6.3 and 13.7.6.1 to ensure that sites beneath the 50 dB Ldn Air Noise Contour or the Airport Noise Influence Area retain the operative plan Residential Suburban or Residential Suburban Transition Zone.</p>	<p>Permitted activity rules 13.6.4.1.1 P4 and 13.7.4.1.1 P3 provide for additional activities or facilities which would be permitted activities in the alternative zone listed for the site listed in Appendices 13.6.6.1, 13.6.6.2, 13.6.6.3 and 13.7.6.1. PC14 proposes to amend a number of the residential zones listed in the Appendices to reflect the nearby/adjacent HRZ or MRZ zones. There are a number of existing schools, and the University of Canterbury site, that sit beneath the QM. Under the PC14 proposal this would enable intensification under the MRZ or HRZ provisions. Given this, the existing operative Plan zoning references should be retained</p>

Sub #	Provision	Position	Relief requested	Explanation
				for the reasons outlined in submission point 2 above.
20	Chapter 6.5 Scheduled Activities Rule 6.5.6	Oppose	Amend rule 6.5.6 to ensure that sites beneath the 50 dB Ldn Air Noise Contour or the Airport Noise Influence Area retain the operative plan Residential Suburban or Residential Suburban Transition Zone.	<p>Chapter 6.5 prescribes provisions for scheduled activities across the city. Clause 6.5.3, How to interpret and apply the rules, notes that:</p> <p>a. <i>Any activity, other than the scheduled activity identified in Rule 6.5.6, shall be subject to the provisions of the zone listed in Rule 6.5.6 and shown on the Planning Maps.</i></p> <p>PC14 proposes to amend a number of the residential zones listed in rule 6.5.6 to reflect the nearby/adjacent HRZ or MRZ zones. There are a number of scheduled activities sit beneath the QM. Under the PC14 proposal this would enable intensification under the MRZ or HRZ provisions. Given this the existing operative Plan zoning references should be retained for the reasons outlined in submission point 2 above.</p>

Submitter Details

Preferred method of contact	Email
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Name

LPC submission on PC14

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: Lyttelton Port Company Limited (LPC)

- 1 This is a submission on the proposed Housing and Business Choice Plan Change to the Christchurch District Plan (PC14).
- 2 LPC could not gain an advantage in trade competition through this submission.
- 3 The specific provisions of PC14 that LPC's submission relates to and the reasons for LPC's submission are set out in **Appendix 2**.
- 4 The general and specific reasons for LPC's relief sought in **Appendix 2** are set out in full in **Appendix 1**.
- 5 LPC seeks the following decisions from the Hearings Panel on behalf of Christchurch City Council:
 - 5.1 Grant the relief as set out in **Appendix 2**; and
 - 5.2 Grant any other similar or consequential relief that would address LPC's concerns set out in this submission.
- 6 LPC wishes to be heard in support of the submission.
- 7 If others make a similar submission, LPC will consider presenting a joint case with them at a hearing.

Signed for and on behalf of Lyttelton Port Company Limited by its solicitors and authorised agents Chapman Tripp



Jo Appleyard
Partner
12 May 2023

Address for service of submitter:

Lyttelton Port Company Limited

c/- Annabelle Lee
 Chapman Tripp
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APPENDIX 1

Overview

- 1 Lyttelton Port Company Limited (*LPC*) welcomes the opportunity to submit on the proposed Housing and Business Choice Plan Change to the Christchurch District Plan (*PC14*).
- 2 LPC also notes and appreciates the consultation undertaken by Christchurch City Council (*CCC*) in its preparation of *PC14*.

Lyttelton Port

- 3 Lyttelton Port of Christchurch (*Lyttelton Port*) is the South Island's major deep-water Port and is New Zealand's third largest container terminal by volume, after Port of Tauranga and Ports of Auckland.
- 4 Lyttelton Port is the primary international gateway for the South Island, with Christchurch being the major distribution centre for inbound goods. Export customers include a wide variety of dairy, meat, forestry, horticultural, and manufacturing businesses, as well as coal which is an important export for the west coast region.
- 5 LPC employs approximately 650+ staff in operational, management and administration roles. Furthermore, there are approximately 1000 people employed by companies operating at Lyttelton Port.

CityDepot

- 6 CityDepot on Chapmans Road is an 'Inland Port' that has a direct connection with the container terminal at Lyttelton Port. CityDepot is the closest container depot site to Lyttelton Port and has the benefit of an existing rail siding.
- 7 CityDepot operates 24 hours a day for five and a half days a week and has good access to the State Highway network and to the rail network via the 24 wagon rail siding.
- 8 CityDepot is an integral and integrated component within the infrastructure of Lyttelton Port. The facility enables LPC to better optimise container movements on and off the wharf for its key customers and cannot be distinguished in a functional or operational sense from the remainder of Lyttelton Port activities.

Summary of LPC submission on PC14

- 9 The importance of Lyttelton Port (including CityDepot) is reflected in various higher-order statutory documents:
 - 9.1 The New Zealand Coastal Policy Statement recognises that a sustainable transport system requires an efficient network of safe ports, servicing national and international shipping.

- 9.2 The National Policy Statement on Urban Development (*NPS-UD*) defines port facilities of a port company as nationally significant infrastructure.
- 9.3 The Canterbury Regional Policy Statement (*CRPS*) lists Lyttelton Port as 'strategic infrastructure;' and, by definition, strategic infrastructure is deemed to be regionally significant infrastructure.
- 9.4 Consistent with the *CRPS*, the Christchurch District Plan lists Lyttelton Port as strategic infrastructure.
- 10 The port operations at Lyttelton Port and CityDepot are close to existing residential areas that are zoned residential.
- 11 The Christchurch District Plan contains comprehensive provisions that implement these higher-order documents in order to ensure the ongoing safe and efficient operation of Lyttelton Port and CityDepot, including managing the impacts of noise generated by LPC's operations and reverse sensitivity effects.
- 12 LPC's primary concern with PC14 is to ensure the planning framework continues to protect and appropriately manage its operations. In summary, with regards to PC14 LPC's key submission points are:
 - 12.1 Support/retention of the Lyttelton Port Influences Overlay qualifying matter, including the underlying density controls.
 - 12.2 Addition of an Inland Port Influences Overlay qualifying matter.
 - 12.3 Removal of the Tsunami Management Area qualifying matter from CityDepot.
- 13 These and LPC's other submission points are explained in the sections below and in the table in **Appendix 2**.

**Resource Management (Enabling Housing Supply and Other Matters)
Amendment Act 2021**

National Policy Statement on Urban Development

- 14 The *NPS-UD* directs that local authority decisions on urban development are to be integrated with infrastructure planning decisions,¹ and that planning decisions contribute to well-functioning urban environments.²
- 15 A well-functioning urban environment is one in which:
 - 15.1 infrastructure – particularly nationally significant infrastructure such as Lyttelton Port (and CityDepot) – is not adversely affected by incompatible activities; and

¹ Objective 6.

² Policy 1.

- 15.2 urban growth is planned with infrastructure provisions in mind, recognising that the two run hand-in-hand.
- 16 While NPS-UD Policy 3 directs councils to increase density and realise as much development capacity as possible in urban environments, Policy 4 allows district plans applying to tier 1 urban environments to modify the relevant building height or density requirements to the extent necessary to accommodate a qualifying matter.
- 17 Qualifying matters include, relevantly:

any matter for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure.

The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021

- 18 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, provided that the MDRS may be less enabling of development where a qualifying matter applies.³
- 19 Consistent with the NPS-UD definition above, qualifying matters include matters required to ensure the safe or efficient operation of nationally significant infrastructure (such as Lyttelton Port).⁴
- 20 Where a qualifying matter is already provided for in an operative district plan, it is defined under the Enabling Housing Act as an “existing qualifying matter” and is, in effect, pulled through in the process of incorporating the MDRS in the relevant district plan.⁵

Existing Christchurch District Plan provisions

- 21 The Christchurch District Plan contains a number of provisions that recognise and provide for the safe, efficient and effective operation and development of Lyttelton Port:

21.1 Strategic Objective 3.3.13(a) states that:

the social, economic, environmental, and cultural benefits of infrastructure, including strategic infrastructure, are recognised and provided for, and its safe, efficient and effective development, upgrade, maintenance and operation is enabled.

Lyttelton Port is specifically listed as strategic infrastructure.

³ Resource Management Act 1991 (*RMA*), s 80F(1)(a).

⁴ *RMA*, s 77I(e).

⁵ *RMA*, s 77K.

21.2 Strategic Objective 3.3.13(b) states that:

strategic infrastructure, including its role and function, is protected from incompatible development and activities by avoiding adverse effects from them, including reverse sensitivity effects.

21.3 The Christchurch District Plan defines reverse sensitivity as follows:

meaning the effect on existing lawful activities from the introduction of new activities, or the intensification of existing activities in the same environment, that may lead to restrictions on existing lawful activities as a consequence of complaints.

Proposed PC14 provisions

Lyttelton Port Influences Overlay

- 22 PC14 includes the "Lyttelton Port Influences Overlay" as an "existing qualifying matter" to ensure the safe and efficient operation of Lyttelton Port and its protection from reverse sensitivity effects.
- 23 The proposed approach is to restrict residential intensification within the Lyttelton Port Influences Overlay to the levels currently provided for in the Christchurch District Plan and not allow that density to increase.
- 24 LPC supports this approach and, in terms of the relevant matters in section 77K(1) of the Enabling Housing Act, notes that:
 - 24.1 Under the Christchurch District Plan, the Lyttelton Port Influences Overlay and associated rules were introduced to control activities that are sensitive to port noise and to identify properties eligible for acoustic treatment. LPC supports the spatial extent of the Lyttelton Port Influences Overlay qualifying matter as identified by CCC in PC14.⁶
 - 24.2 Within the Lyttelton Port Influences Overlay, LPC supports the density standards in PC14 which are proposed to remain the same as those in the Christchurch District Plan.⁷
 - 24.3 The Lyttelton Port Influences Overlay applies to areas already identified in the Christchurch District Plan as areas where reverse sensitivity effects from incompatible land use on Lyttelton Port must be avoided.⁸

CityDepot – Inland Port Influences Overlay

- 25 There is currently no overlay associated with CityDepot in the Christchurch District Plan. This is a result of the history of the establishment of this site and also the fact that LPC has had limited opportunity to consider and pursue this planning matter,

⁶ RMA, s 77K(1)(a) – Identify by location where an existing qualifying matter applies.

⁷ RMA, s 77K(1)(b) – Specify the alternative density standards.

⁸ RMA, s 77K(1)(c) – Identify why a qualifying matter applies to the areas under (a).

particularly given the focus in the last decade has been on the recovery of Lyttelton Port after the Canterbury earthquake sequence.

- 26 CityDepot has always been subject to the noise limits specified in the Christchurch District Plan. These noise limits are measured and set at the site receiving the noise. There is a Residential Hills Zone that is located on the opposite side of State Highway 76 (Port Hills Road) from CityDepot, which runs north towards Opawa Road.
- 27 The development enabled by the MDRS on residential sites on Port Hills Road may result in an increase in the number of people subject to noise from CityDepot. This is particularly the case given the increased building heights and may expose LPC to reverse sensitivity effects which could constrain the operation of CityDepot.
- 28 It is important to recognise that CityDepot constitutes “port facilities” and is of national significance the same way that Lyttelton Port is.
- 29 As outlined above, the MDRS may be made less enabling of development to the extent necessary to accommodate qualifying matters, which include matters required to ensure the safe or efficient operation of nationally significant infrastructure.⁹
- 30 On this basis, LPC proposes the inclusion in PC14 of an additional qualifying matter for CityDepot, the “Inland Port Influences Overlay”. This is proposed in order to address the potential for reverse sensitivity issues at CityDepot and ensure the safe and efficient functioning of CityDepot as an element of LPC’s port facilities. It would cover properties in the nearby Residential Hills Zone but only to the extent of requiring noise mitigation for habitable spaces in certain circumstances.
- 31 More specifically, CityDepot is required to screen noise up to a height of a two-storey high dwelling located on the opposite side of Port Hills Road. However, screening three-storey buildings from noise is unrealistic given the higher elevation of the residential properties located on the other side of Port Hills Road. The proposed rule applying in the new Inland Port Influences Overlay addresses this issue. Further detail is provided at **Appendix 2**.

Industrial Interface Overlay

- 32 PC14 has also introduced, as a qualifying matter, an Industrial Interface Qualifying Matter. The Industrial Interface Overlay applies to part of the Residential Hills Zone on the other side of Port Hills Road from CityDepot and LPC’s Civil Maintenance Yard in Lyttelton; and, in principle, is supported.
- 33 However, there appears to be two problems with the Industrial Interface Overlay located on the other side of Port Hills Road. First, PC14 has, inadvertently, failed to introduce rules to restrict residential intensification within the Industrial Interface Overlay for the Residential Hills Zone.

⁹ RMA, s 77I(e).

- 34 The Residential Suburban Zone, on the other hand, has introduced a built form standard that restricts the height of buildings to 7m high or two storeys whichever is the lesser within the Industrial Interface Overlay (Rule 14.4.2.3 (v)). An equivalent built form standard applying to Residential Hills Zone on the other side of Port Hills Road would address LPC's concerns.
- 35 As outlined above, CityDepot can screen noise up to a height of a two-storey high dwelling located the opposite side of Port Hills Road. However, screening three-storey buildings from noise is unrealistic given the higher elevation of the residential properties located on the other side of Port Hills Road.
- 36 The second potential problem with the Industrial Interface Overlay relates to its spatial extent. Planning Map 47 displayed on the interactive website shows the Industrial Interface Overlay having a nominal width, which does not necessarily coincide with the parcel boundaries of the affected residential properties. The entire residential property parcels should be included for properties between 311 – 321 Port Hills Road. Otherwise, there might remain the potential for a three-storey building to be constructed at the south-western end of a property and the potential for reverse sensitivity effects could result. LPC accordingly seeks an extension of this qualifying matter for the full spatial extent shown on **Appendix 3**
- 37 To be clear, LPC's interests in this respect are limited to residentially zoned land in proximity to CityDepot. For this reason, its specific relief seeks an "Inland Port" sub-area for the qualifying matter, or other similar relief that achieves the same intent.

Tsunami Management Area

- 38 There may be instances where residential activities are provided for within certain Industrial Zones and CCC may wish to introduce certain restrictions on residential intensification. However, CityDepot is zoned Industrial General Zone and Industrial Heavy Zone. On this basis, the introduction of the Tsunami Management Area Overlay on this land appears outside the scope of PC14.
- 39 In any case, the Industrial General Zone and the Industrial Heavy Zones regulate residential activities as discretionary and non-complying activities respectively (see Rules 16.4.1 (D1) and 6.5.1.5 (NC4)). Any application for resource consent would need to address all effects on the environment, including any effects from natural hazards. Consequently, there is no rationale for the introduction of the Tsunami Management Area Overlay over land occupied by CityDepot.
- 40 LPC opposes any Tsunami Management Area Overlay being introduced over its facilities as it would prejudice a future submission in the event further provisions on industrial activities are introduced later.

Conclusion

- 41 CCC has appropriately recognised the Lyttelton Port Influences Overlay as a qualifying matter required to avoid reverse sensitivity effects on activities at Lyttelton Port.

- 42 However, for the reasons set out in this submission, LPC consider certain amendments are required to PC14 to fully ensure the safe and efficient operation and development of Lyttelton Port (including CityDepot).

APPENDIX 2

The drafting suggested in this appendix reflects the key changes LPC seeks. Consequential amendments may also be necessary to other parts of the proposed provisions.

LPC proposes drafting below and seeks that this drafting, or drafting with materially similar effect, be adopted by CCC.

Provision	Position	Relief requested	Explanation
General			
6.1A.1 Application of qualifying matters	Support.	Retain 6.1A.1 as notified.	<p>LPC supports the inclusion of 6.1A to explain qualifying matters and that they justify development less enabling than MDRS.</p> <p>In particular, LPC supports identification of the Residential Industrial Interface qualifying matter and the Lyttelton Port Influences Overlay.</p>
6.10A Tree Canopy Cover and Financial Contributions	Neutral.	Ensure LPC's facilities remain exempt from requirements.	LPC understands that the rules, as notified, do not apply to its facilities. LPC supports this position, on the basis that it would be unworkable in the areas where LPC infrastructure is located, and has the potential to impact port operations.

Provision	Position	Relief requested	Explanation
Residential chapter			
14.1 Introduction e. ...	Support.	Retain 14.1 as notified.	LPC supports new subsection e. in so far as it identifies that the Enabling Act allows MDRS to be reduced where justified by a “qualifying matter”.
14.2.3.2 Policy – MDRS Policy 2 <i>a. Apply the MDRS across all relevant residential zones in the district plan except in circumstances where a qualifying matter is relevant (including matters of significance such as historic heritage and the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga).</i>	Support.	Retain policy as notified.	LPC supports the policy direction to apply MDRS except where a qualifying matter applies.
14.3 How to interpret and apply the rules <i>f. There are parts of residential zones where the permitted development, height and/or density directed by the MDRS or Policy 3 of the NPS UD may be modified by qualifying matters. These are identified in detail in Chapter 6.1A and the Planning Maps, and include the following...</i>	Support.	Retain as notified.	LPC supports the identification of qualifying matters that modify that MDRS. In particular, it supports identification of the Lyttelton Port Influence Area (xviii.) and Industrial Interface (xxi.) qualifying matters.

Provision	Position	Relief requested	Explanation
			LPC also seeks the inclusion of a new Inland Port Influences Overlay qualifying matter.
Lyttelton Port Influences Overlay			
<p>Planning Maps</p> <p>Qualifying Matter – Lyttelton Port Influences Overlay</p>	Support.	Retain “Qualifying Matter – Lyttelton Port Influences Overlay” as notified.	<p>As explained in Appendix 1, the intensification of residential activity enabled by MDRS under PC14 must be avoided in areas where it could generate reverse sensitivity effects on Lyttelton Port operations as nationally significant infrastructure.</p> <p>PC14 necessarily includes a qualifying matter to protect Lyttelton Port. The planning maps correctly identify all areas in Lyttelton where the qualifying matter applies and where development to MDRS is inappropriate.</p>
<p>14.8.3 Area-specific rules – Residential Banks Peninsula Zone</p> <p>14.8.3.1.1 – 14.8.3.1.5</p>	Support.	Retain area-specific activities for Residential Banks Peninsula Zone as notified.	LPC supports area-specific rules for the Residential Banks Peninsula Zone, specifically the inclusion of rules on development that remain the same as those within the Christchurch District Plan.

Provision	Position	Relief requested	Explanation
Chapters 14 and 15 – Residential Banks Peninsula Zone and Commercial Banks Peninsula Zone	Support.	Retain without amendment all provisions that apply to or refer to the Lyttelton Port Influences Overlay as notified.	LPC supports the area-specific rules implementing the Lyttelton Port Influences Overlay.
Inland Port Influences Overlay			
Planning Maps Qualifying Matter – Inland Port Influences Overlay	Oppose.	Include new “Qualifying Matter – Inland Port Influences Overlay”.	<p>As explained in Appendix 1, the intensification of residential activity enabled by MDRS under PC14 must be avoided in areas where it could generate reverse sensitivity effects on CityDepot operations as nationally significant infrastructure.</p> <p>LPC accordingly seeks the inclusion of a new Inland Port Influences Overlay qualifying matter to ensure the safe and efficient operation and development of CityDepot.</p> <p>The spatial extent of the new Inland Port Influences Overlay is shown by the purple hashed area in Appendix 3.</p>
Qualifying Matter – Inland Port Influences Overlay	Oppose.	<p>Insert as follows:</p> <p><i>Rule XXX – Habitable space near the Inland Port</i></p>	LPC seeks the inclusion of a new rule to apply in the “Lyttelton Port Influences Overlay” in the Residential Hills Zone to protect CityDepot operations.

Provision	Position	Relief requested	Explanation
New Rule in Residential Hills Zone		<p><i>a. Any new or extensions to existing habitable space of any development located within the Inland Port Influences Overlay shall be designed and constructed so that noise in any habitable space from the Inland Port will not exceed internal sound design level of 30dB LAeq with ventilating windows or doors open or with windows or doors closed and mechanical ventilation installed and operating.</i></p> <p><i>b. Determination of the internal design sound levels required under Clause (a), including any calculations, shall be based on noise from the Inland Port as follows:</i></p> <p><i>i. 50dB LAeq on any façade facing north to north-east towards the Inland Port;</i></p> <p><i>ii. 47dB LAeq on any façade within 90 degrees of facing north to north-east and has partial line of sight to any part of Inland Port;</i></p> <p><i>c. Compliance with this rule shall be demonstrated by providing the Council with a design report prior to</i></p>	<p>This is a targeted rule intended to address potential reverse sensitivity effects on CityDepot as a result of intensification of residential activity within the specified area shown in Appendix 3.</p>

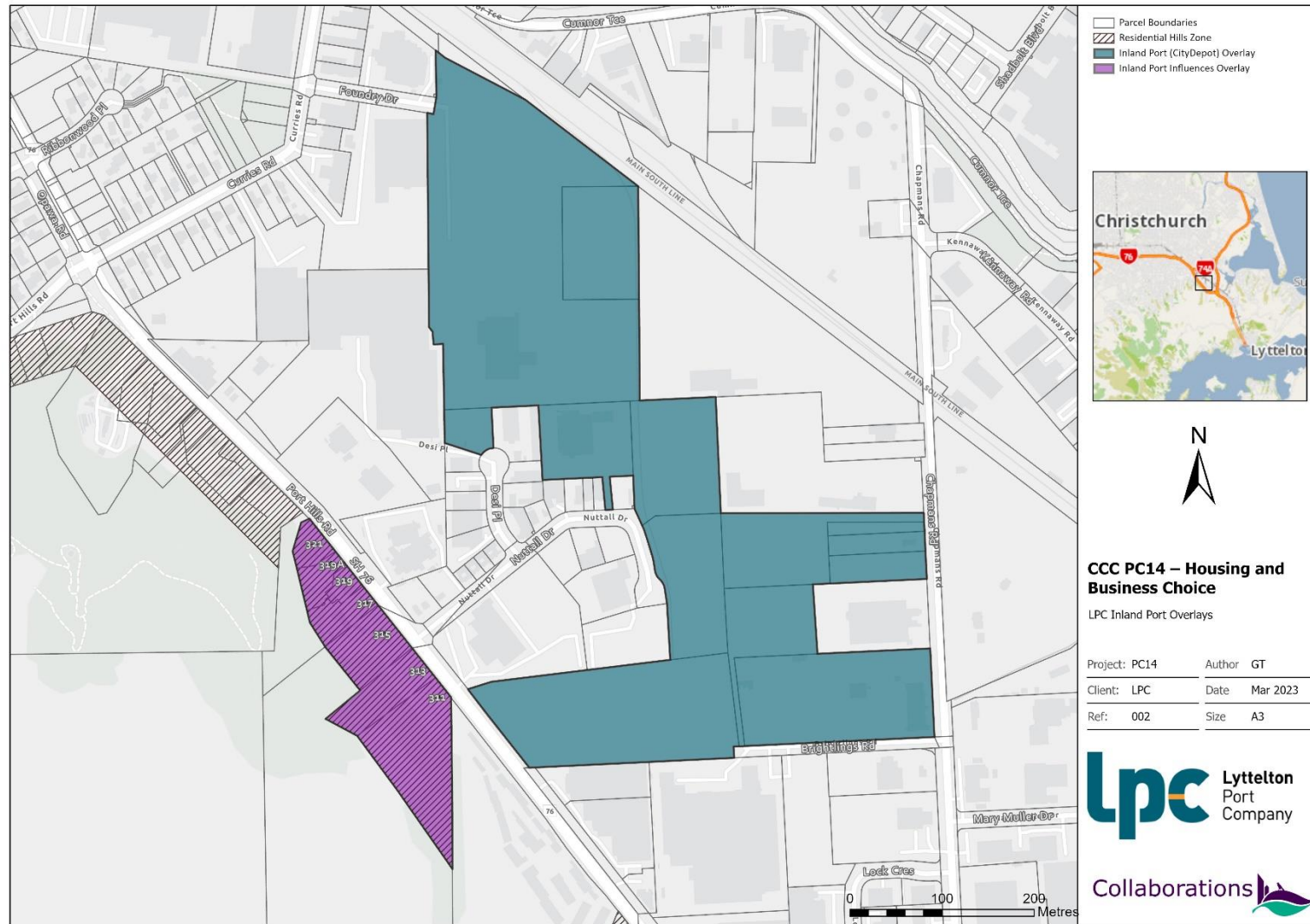
Provision	Position	Relief requested	Explanation
		<i>the issue of the building consent, which is prepared by a suitably qualified acoustics specialist, stating that the design proposed will meet the required internal noise levels.</i>	
Industrial Interface Qualifying Matter Area			
Planning Maps - 47 Qualifying Matter – Industrial Interface	Oppose.	Extend “Qualifying Matter – Industrial Interface” to cover spatial extent of land identified at Appendix 3 and include “Inland Port” sub-area.	<p>While LPC’s preferred relief is a new Inland Port Influences Overlay, LPC notes that the Industrial Interface qualifying matter could afford some protection for its CityDepot and the Civil Maintenance Yard in Lyttelton.</p> <p>As explained in Appendix 1, CityDepot is an integral part of port operations and is largely surrounded by industrial activity at present. Residential intensification is inappropriate in close proximity to CityDepot and the PC14 must protect against reverse sensitivity effects.</p> <p>LPC therefore supports this qualifying matter, but seeks that its spatial extent cover the relevant residential area in close proximity to CityDepot shown by the purple hashed area in Appendix 3.</p>

Provision	Position	Relief requested	Explanation
			For the avoidance of doubt, LPC's interest in this respect is limited to effects on CityDepot.
<p>14.2.12 Objective – Compatibility with industrial activities</p> <p>a. New residential development is not adversely affected by noise generated from industrial activities and the development does not affect the operation of industrial activities within industrial zones.</p>	Support.	Retain objective as notified.	<p>LPC supports the direction that new residential development must not affect the operation of industrial activities within industrial zones.</p> <p>CityDepot is currently zoned "Industrial General Zone" and "Industrial Heavy Zone", and the Civil Maintenance is "Industrial General Zone". It is important that new residential activity does not impact LPC's operations.</p>
<p>14.2.12.1 Policy – Managing effects on industrial activities</p> <p>a. Restrict new residential development of three or more storeys within proximity to industrial zoned sites where it would give rise to reverse sensitivity effects on industrial activities and/or adversely affect the health and safety of residents, unless mitigation sufficiently addresses the effects.</p>	Support.	Retain policy as notified.	<p>LPC supports restriction of residential development where it would give rise to reverse sensitivity effects on industrial activities.</p> <p>CityDepot is currently zoned "Industrial General Zone" and "Industrial Heavy Zone" and the Civil Maintenance Depot is "Industrial General Zone". It is important that new residential activity does not impact its operations.</p>

Provision	Position	Relief requested	Explanation
New discretionary activity in Residential Hills Zone.	Oppose.	<p>Insert as follows:</p> <p><i>Any building for a residential activity that does not meet Rule [x] Building height within the Industrial Interface Qualifying Matter Area, Inland Port Sub-Area.</i></p>	<p>LPC notes that this rule is proposed for the Residential Suburban, Residential Suburban Density Transition, Medium Density and High Density Residential Zones.</p> <p>It is also important that the Residential Hills Zone in close proximity to CityDepot also contains a limit on building height within the Industrial Interface Qualifying Matter.</p>
New standard for building height	Oppose.	<p>Insert as follows:</p> <p><i>Any building for a residential activity within the Industrial Interface Qualifying Matter Area, Inland Port Sub-Area: 7 metres or 2 storeys, whichever is the lesser.</i></p>	<p>LPC notes that this rule is proposed for the Residential Suburban, Residential Suburban Density Transition, Medium Density and High Density Residential Zones.</p> <p>It is also important that the Residential Hills Zone in close proximity to CityDepot also contains a limit on building height within the Industrial Interface qualifying matter.</p>
Tsunami Management Area			
<p>Planning Maps</p> <p>Qualifying Matter – Tsunami Management Area</p>	Oppose.	Remove Tsunami Management Area qualifying matter from LPC's CityDepot site in Hillsborough.	LPC opposes the application of the Tsunami Management Area Overlay to its CityDepot site on Planning Map 47.

Provision	Position	Relief requested	Explanation
			<p>This is out of scope of the plan change.</p> <p>Additionally, there is no rationale for its application given residential activities are not provided for in the "Industrial General Zone" nor the "Industrial Heavy Zone" which currently apply to the site.</p> <p>LPC is concerned that the proposed qualifying matter may unintentionally restrict its ability to operate, maintain and upgrade the CityDepot facilities in the future.</p>
<p>Policy 5.2.2.5.2 – Managing development within Qualifying Matter Tsunami Management Area</p> <p>Within the Tsunami Management Area Qualifying Matter, avoid development, subdivision and land use that would provide for intensification of any site, unless the risk to life and property is acceptable.</p>	Oppose.	Remove Tsunami Management Area qualifying matter from LPC's CityDepot site in Hillsborough.	LPC is neutral on this policy provided the CityDepot site is excluded from the Qualifying Matter Area.
5.4A Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area	Oppose.	Remove Tsunami Management Area Qualifying matter from LPC's CityDepot site in Hillsborough.	LPC is neutral on the proposed rule framework within the Qualifying Matter Tsunami Management Area provided the

Provision	Position	Relief requested	Explanation
<p><i>5.4A.1 Permitted activities</i></p> <p><i>a. There are no permitted activities</i></p>			<p>CityDepot site is excluded from the Qualifying Matter Area.</p> <p>It is critical that LPC's infrastructure, which is regionally and nationally significant, is not subject to restrictive rules such as 5.4A.1 which provides that there are no permitted activities. This is highly likely to impact LPC's ability to operate, maintain and upgrade infrastructure at CityDepot.</p>
<p>5.4A Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area</p> <p><i>NC3</i></p> <p><i>Development, subdivision and land use that would provide for residential intensification of any site within the Qualifying Matter Tsunami Management Area except that permitted or controlled in Rule 14.4.1.</i></p>	Oppose.	Remove Tsunami Management Area Qualifying matter from LPC's CityDepot site in Hillsborough.	<p>LPC is neutral on the proposed rule framework within the Qualifying Matter Tsunami Management Area provided the CityDepot site is excluded from the Qualifying Matter Area.</p> <p>While LPC's activities would not be impacted by the proposed non-complying activity status for residential intensification within the Qualifying Matter Tsunami Management Area, it is appropriate for CityDepot to be exempt from the proposed rule framework entirely.</p>



Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Jo

Last name:

Appleyard

Organisation:

Orion New Zealand Limited (Orion)

On behalf of:

Orion New Zealand Limited (Orion)

Preferred method of contact

Email

Attached Documents

Name
Orion submission on PC14 v1

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: Orion New Zealand Limited (*Orion*)

- 1 This is a submission on the proposed Housing and Business Choice Plan Change to the Christchurch District Plan (*PC14*).
- 2 Orion could not gain an advantage in trade competition through this submission.
- 3 The specific provisions of PC14 that Orion's submission relates to and the reasons for Orion's submission are set out in **Appendix A** and **Appendix B** below.
- 4 Orion's submission relates to the whole proposal. The general and specific reasons for Orion's relief sought in **Appendix B** are set out in **Appendix A**.
- 5 Orion seeks the following decision from the local authority:
 - 5.1 Grant the relief as set out in **Appendix A and B**;
 - 5.2 Grant any other similar relief that would deal with Orion's concerns set out in this submission.
- 6 Orion wishes to be heard in support of the submission.
- 7 If others make a similar submission, Orion will consider presenting a joint case with them at a hearing.

Signed for and on behalf of Orion New Zealand Limited by its solicitors and authorised agents Chapman Tripp



Jo Appleyard
Partner
12 May 2023

Address for service of submitter:

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APPENDIX A

Overview

- 1 Orion New Zealand Limited (*Orion*) welcomes the opportunity to submit on the proposed Housing and Business Choice Plan Change to the Christchurch District Plan (PC14).
- 2 At the outset, Orion wishes to acknowledge the collaborative approach of Christchurch City Council (CCC) during the pre-notification consultation period. This has narrowed the areas of potential contention and Orion is generally supportive of PC14 as notified.

Background

- 3 Orion owns and operates the electricity distribution network covering approximately 8000 square kilometres across Christchurch and central Canterbury, between the Waimakariri and Rakaia Rivers. Orion is a community owned entity; Christchurch City Holdings Limited (owned by CCC) owns 89% of Orion and the Selwyn District Council owns 11%.
- 4 The electricity distribution network, including Orion's significant electricity distribution lines (*SEDs*) is critical, strategic and regionally significant infrastructure:
 - 4.1 Orion delivers electricity to approximately 220,000 homes and businesses throughout Christchurch City and Selwyn District. The network covers around 8,000km² and includes 11,500km of overhead lines and underground cables, 50 zone substations, 396 steel sub transmission towers, 90,000 power poles and 11,700 distribution substations.
 - 4.2 Orion is responsible for the establishment, operation, maintenance and upgrade of the electricity distribution network. As a lifeline utility, Orion must be able to continue operating the electricity distribution network to the fullest extent possible, during and after an emergency – resilience and easy access to lines for maintenance is key to fulfilling this obligation.¹
 - 4.3 The electricity distribution network has a crucial role in securing New Zealand's decarbonisation and climate change adaptation goals – supporting a transition to a low emissions economy.
 - 4.4 Orion's SEDs are the backbone of the network – delivering sub-transmission voltages (66,000V and 33,000V) to a number of substations across the network so that electricity can be transformed down to lower voltages and delivered to customers.
- 5 It is important that PC14 enable the continued safe and efficient operation, maintenance, use and development of the electricity distribution network and must also protect the SEDs from reverse sensitivity effects. In particular, it is vital that PC14 protect existing SEDs as residential intensification has the potential to

¹ Civil Defence Emergency Management Act 2002.

negatively impact Orion infrastructure without the controls proposed and outlined in detail at **Appendix B**. In summary:

- 5.1 Orion supports recognition of SEDLs as a qualifying matter in PC14;
- 5.2 However, Orion also seeks protection of its lower voltage lines as there is risk that intensification will cause similar issues; and
- 5.3 Orion further seeks that PC14 include an electricity servicing standard to ensure infrastructure capacity requirements can be met.

RESOURCE MANAGEMENT (ENABLING HOUSING SUPPLY AND OTHER MATTERS) AMENDMENT ACT 2021

National Policy Statement on Urban Development

- 6 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
- 7 A well-functioning urban environment is one in which:
 - 7.1 Infrastructure is not adversely affected by incompatible activities; and
 - 7.2 Urban growth is planned with infrastructure provisions in mind, recognising that the two run hand-in-hand.
- 8 While NPS UD Policy 3 directs councils to increase density and realise as much development capacity as possible in urban environments, Policy 4 allows district plans applying to tier 1 urban environments to modify the relevant building height or density requirements to the extent necessary to accommodate a qualifying matter.

The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021

- 9 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 are required to incorporate Medium Density Residential Standards (*MDRS*) into every relevant residential zone provided that the MDRS should be less enabling of development where a qualifying matter applies.⁴
- 10 The electricity distribution network is not listed in the NPS UD as “nationally significant infrastructure”. As such, the network as a whole (and various controls and restrictions that apply to development adjacent to it) does not fit within one of the pre-subscribed qualifying matters set out in s 77I of the RMA.

² Objective 6.

³ Policy 1.

⁴ Resource Management Act 1991 (*RMA*), s 80F(1)(a).

- 11 However, the Council is able to identify as a qualifying matter “any other matter that makes higher density, as provided for by the MDRS or policy 3, inappropriate in an area” – if s 77L is satisfied.⁵
- 12 The electricity distribution network is identified in regional and district planning documents as regionally significant and strategically important infrastructure and there are relevant controls already protecting Orion’s assets in the Christchurch District Plan (*District Plan*).⁶ Further, Orion is a lifeline utility and provides an essential service. It must be able to fulfil its function to the fullest possible extent, even though that may be at a reduced level, during and after an emergency.
- 13 The development enabled by MDRS is likely to result in a significant increase to electricity demand, while simultaneously limiting the area of land available for electricity distribution equipment and infrastructure. It is critical that intensification occurs with electricity infrastructure provision in mind, and PC14 must reflect this. Existing infrastructure must be protected from hazards and risks associated with inappropriate development, and sufficient land must be reserved for new infrastructure to service increased development.
- 14 Orion generally supports CCC’s implementation of the Enabling Housing Act in PC14. In particular, it supports recognition of *Electricity Distribution Corridors and Infrastructure* as a qualifying matter (the *SEDL QM*) in order to protect against reverse sensitivity effects and to ensure that it can build, operate, maintain and upgrade its infrastructure in a safe, efficient and effective manner. However, Orion considers refinement of the provisions as notified in PC14 are required as outlined at **Appendix B**.
- 15 Below we assess Orion’s infrastructure against relevant provisions of the Enabling Housing Act.

Section 77J and Section 77L Enabling Housing Act – Corridor Protection for SEDLs

- 16 Land use activities in proximity to Orion’s SEDLs have the potential to affect, and may be affected by, Orion’s electricity distribution operations. Sensitive land uses, such as residential activity in proximity to SEDLs, may expose people to safety hazards. Buildings, structures, fences and other obstacles can also impede Orion’s ability to safely and efficiently operate, maintain and upgrade the network.
- 17 The District Plan contains corridor protection buffers for SEDLS. Orion supports CCC’s inclusion of the SEDL QM in PC14 for reasons outlined below.

⁵ Resource Management Act 1991, s 77I(j): inserted by Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021, s 9.

⁶ For example, Strategic Objective 3.3.12(b)(v) which directs that adverse effects on SEDLs are to be avoided. Also see Rule 14.5.1.5, Non-complying activities, NC3.

Section 77J(3)(a) – Demonstrate why the area is subject to a qualifying matter and why the qualifying matter is incompatible with the level of development permitted by the MDRS

- 18 The SEDLs subject to corridor protection buffers in the District Plan are shown on the planning maps. Spatially, the SEDL QM applies to the same land area covered by the SEDL corridor protection in the District Plan.
- 19 MDRS enables residential development up to 11m in height and at a minimum of 1.5 metres from the boundary. This is incompatible with Orion's existing overhead infrastructure and electricity safety clearances from support structures and the centre line of conductors.
- 20 Residential setbacks within electricity distribution corridors are based on requirements in the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001). NZECP 34:2001 is an industry standard overseen by WorkSafe and which sets minimum safe electrical clearance requirements for structures, and certain activities, in relation to overhead electric line installations and support structures. NZECP 34:2001 states that the minimum safe distances have been set primarily to protect persons, property, vehicles and mobile plant from harm or damage from electrical hazards – including electric shock. It is vital that PC14 give effect to clearance distances as set out in the NZECP 34:2001, and the District Plan, as a matter of health and safety.
- 21 The location of lines subject to the existing electricity distribution corridors is fixed and unchanged, and the hazards associated with development near the lines exist irrespective of the Enabling Housing Act and MDRS. Because the location of the assets subject to the SEDL QM is unchanged, as is the risk of development near them, the area subject to the SEDL QM should also remain unchanged through the MDRS process. Orion supports PC14 as notified in this regard, as the planning maps reflect existing corridors as the SEDL QM.

Section 77J(3)(b) – Assess the impact that limiting development capacity, building height, or density (as relevant) will have on the provision of development

- 22 Electricity clearance distances are already required and prescribed in NZECP 34:2001. It is artificial to view inclusion or accommodation of corridor protection rules as "preventing" a level of development that would otherwise be enabled by the MDRS and Policy 3. While these restrictions (and modification of MDRS accordingly), would mean residential development beneath and immediately adjacent to existing SEDLs is heavily restricted from a resource consent perspective; NZECP 34:2001 would still apply in their absence.
- 23 In addition, it is not realistic to assume that every residentially zoned site will take up the opportunity to develop to the extent enabled through the MDRS. Many sites in residential zones have been recently re-developed and contain newly-built dwellings that are unlikely to be further modified to re-build in line with MDRS. Other sites may contain additional practical constraints which limit the opportunity to take up MDRS.

- 24 The way corridor protection provisions interact with a site is highly site-specific. The lines do not necessarily follow street lines or a particular orientation – meaning that depending on the site, they may pass over only a small portion or corner of a site (thus enabling development on the remainder of the site), while in other cases they may pass directly over a site (or anywhere in between these two extremes).
- 25 In reality, it is expected that both the number of sites actually affected by the SEDL QM, and the development capacity lost by its inclusion, is immaterial. This is especially so when considering what is already required in accordance with NZECP 34:2001.

Section 77J(3)(c) – Assess the costs and broader impacts of imposing those limits

- 26 As explained above, the costs on development capacity of including corridor protection setbacks in PC14 are negligible in light of NZECP 34:2001 and setbacks already contained in the District Plan.
- 27 Alternatively, the costs of not including the qualifying matter could be considerable:
- 27.1 Without clear restrictions on residential development within corridor protection setbacks, there is a risk that electricity clearance distances are compromised. This is first and foremost an electrical hazard and must be remediated immediately to keep people and property safe. Safety is non-negotiable for Orion.
- 27.2 The cost to remedy clearance breaches is considerable. Modifications can involve raising the lines or through the lateral relocation of the lines and poles or, in extreme cases, it may be necessary to underground the line. This can cost anywhere between \$20,000 - \$100,000 depending on the nature and extent of the breach, a cost ultimately borne by the landowner.
- 27.3 The remedial options available are also controlled by District Plan rules. For example, road reserves often support an array of infrastructure and there can be few options for new pole locations or additional underground electrical infrastructure.
- 28 In Orion's experience, including the corridor protection rules explicitly in district plans assists in ensuring critical electricity safety clearances are actually considered and complied with in practice. Requirements of NZECP 34:2001 can be, and often are, missed in this process. Highlighting and specifically incorporating and retaining the requirements of NZECP 34:2001 in PC14 will improve safety to the public, remove cost associated with remediation and promote good electricity network outcomes.
- 29 There is a clear benefit to recognising safe clearance distances as a qualifying matter in PC14. It presents a clear signal to plan users and would significantly reduce the likelihood of clearances being overlooked and compromised by incompatible development.

Section 77J(4)(b) – how modifications to the MDRS as applied to relevant residential zones are limited to only those modifications necessary to accommodate qualifying matters and, in particular, how they apply to any spatial layers relating to overlays, precincts, specific controls, and development areas

- 30 Residential development is inappropriate within SEDL protection corridors as a matter of health and safety. Specific amendments to MDRS requiring setbacks from electricity support structures and the centre line of conductors proposed within the SEDL QM area are provided in **Appendix B**. The modifications proposed are only those necessary to accommodate the SEDL QM.

Section 77L(a) – Identify the specific characteristic that makes the level of development provided by the MDRS (as specified in Schedule 3A or as provided for by policy 3) inappropriate in the area

- 31 In the vast majority of cases, virtually any new or expanded residential development within an electricity distribution corridor is inappropriate.
- 32 By contrast, the MDRS provide a framework whereby residential development is permitted, provided certain standards are met.⁷ There is no one particular standard (or characteristic) in Schedule 3A which makes the application of the MDRS to corridors inappropriate. Rather, it is the enablement of residential development per se given any dwelling risks electricity clearances and can prevent or hinder access to lines and associated support structures. Thus, the MDRS proceeds on an assumption that is contrary to the starting point that applies to electricity distribution infrastructure.
- 33 Of all the characteristics specified in Schedule 3A, building height could be the most problematic (or inappropriate) in terms of SEDLs. That said, while the building height limits in the MDRS (up to 11m in height) are inappropriate within corridors, far lower height limits, of say five or six metres, are also incompatible with SEDLs, given lines heights, clearances and access requirements.

Section 77L(b) – Justify why that characteristic makes that level of development inappropriate in light of the significance of urban development and the objectives of the NPS-UD

- 34 Objective 1 of the NPS UD is focused on “well-functioning urban environments... that enable... social, economic and cultural wellbeing...and...health and safety, now and into the future”. Accommodating the existing corridor protection provisions as a qualifying matter is entirely consistent with this objective. In particular, the corridors enable and facilitate the distribution of electricity, which is critical for social and economic wellbeing, and they are specifically designed to keep persons, property, vehicles and mobile plant safe from electrical hazards.
- 35 Objective 6 of the NPS UD is also particularly pertinent in this context. Electricity network planning and development decisions are made based on scenarios that span many decades, with individual network assets often having a service life exceeding 40 or 50 years. Limiting residential development via the corridor protection provisions and SEDL QM integrates local authority decision making with

⁷ Enabling Housing Act, Schedule 3A CI 2(1).

infrastructure planning and funding decisions as it gives some certainty around residential development adjacent to critical network assets and infrastructure.

Section 77L(c) – Site-specific analysis

36 The SEDL QM relates to all sites that are within the corridor protection buffers for all existing 66kV and 33kV within Christchurch City.

37 It is not realistic to evaluate each site impacted by the corridor protection buffers to determine whether some development beneath the lines may be possible. Such an assessment requires detailed engineering analysis which takes into account a number of factors.

38 However, this is not detrimental to the identification of the qualifying matter. The geographic area where intensification needs to be compatible is readily identifiable on the District Plan maps.

Clearances around 11kV and Low Voltage Lines

39 The clearances associated with SEDLs (generally 33kV and 66kV lines) are addressed above in the context of the SEDL QM. However, it is also vital that the smaller clearances associated with lower voltage lines are also addressed as part of PC14.

40 Increased building height limits and smaller boundary setbacks enabled by the MDRS also have the potential to cause significant issues for large parts of Orion's existing 11kV, 400V and 230V network. These voltages are generally the most common on any electricity distribution network and – broadly speaking – are the vast majority of lines that are seen in any given residential street.

41 As noted above, NZECP34:2001 is an industry standard overseen by WorkSafe that sets minimum safe electrical clearance requirements for structures and certain activities in relation to overhead electric line installations and support structures. NZECP 34:2001 prescribes that certain clearances must be met in relation to 230V, 400V and 11kV lines.

42 Encroachment on clearances can threaten the safe, secure and reliable supply of electricity because:

42.1 It increases safety risks to people and property. If an electrical fault occurs, having buildings and certain activities near overhead lines has the potential to cause significant harm or death.

42.2 It increases risks to infrastructure assets from third party activity and can compromise Orion's ability to operate, repair, maintain and upgrade this infrastructure which adds significantly to costs and duration of works.

42.3 It can impact on the reliability of electrical supply as repair, maintenance and upgrading can be delayed and / or take longer.

43 While existing development already presents challenges to the location of electricity infrastructure and protection of lines clearances, the scale and density of

intensification associated with the MDRS (which enables construction of taller buildings in closer proximity to boundaries) will see these challenges increase significantly in prevalence and severity.

- 43.1 If higher buildings are permitted, this may compromise safe clearance distances as new or larger residential buildings encroach on existing overhead lines.
- 43.2 Where overhead lines run along road frontages, higher buildings on private land close to the boundary may also compromise clearance distances.
- 43.3 Where overhead lines run down a right of way, intensification may bring new buildings close to these lines and compromise clearances.
- 44 Recognition of clearances for 11kV, 400V and 250V lines as part of PC14 would significantly reduce the likelihood of clearances being overlooked and ultimately compromised by residential development. It is important to remember that clearances are first and foremost about keeping people and property safe around electrical hazards.
- 45 At Appendix B, Orion proposes an additional standard in PC14 to address clearances around these lower voltage lines. It also proposes an appropriate consenting pathway for development that does not meet these clearances, acknowledging that in some cases an overhead lines clearance assessment by a suitably qualified engineer may confirm it is safe and appropriate for smaller clearances to apply.
- 46 The costs of imposing Orion's proposed clearance limits in PC14 are negligible given compliance must already be achieved under NZECP 34:2001. On the other hand, there are significant benefits to the protection of clearances as a related matter whereby electricity supply is protected and enabled, and safety is promoted.

Related Provisions for Electricity Equipment and Lines Protection

- 47 The issues of residential development failing to properly integrate with associated network servicing requirements, and challenges with locating the necessary infrastructure to service medium and high-density residential development is an issue that does not strictly fall into the category of a qualifying matter but is integral to the successful update and delivery of the MDRS.
- 48 Servicing capacity is therefore a matter which CCC should consider in tandem. Section 80E(1)(b)(iii) of the Enabling Housing Act provides for the inclusion of "related provisions" (including objectives, policies, and rules) that support or are consequential on the MDRS. Among other things, "related provisions" may relate to infrastructure.⁸

Ground Mounted Electricity Equipment

- 49 The electricity distribution network can be upgraded to service new dwellings and greater intensification, provided that intensification and development takes into

⁸ Resource management (Enabling Housing Supply and Other Matters) Amendment Act 2021 s 80E(2)(d).

account the need for upgraded infrastructure. Intensification (and the resulting increased demand for electricity) generally results in a need for upgraded / reinforced overhead electricity lines and / or underground cables, and larger or an increased number of ground mounted equipment such as electricity distribution kiosks, cabinets and distribution boxes.

- 50 When sites are developed (or redeveloped) via intensification, it is critical that the electricity network is considered, and sufficient land is reserved for electricity distribution infrastructure.
 - 50.1 There is a functional need for electricity distribution infrastructure to be located on, or immediately adjacent to, sites that the infrastructure services. Lines and cables must connect to the site in order to provide electricity. Kiosks, cabinets and distribution substations must be located around the electricity network in accordance with the demand for electricity. This equipment cannot perform its function if it is situated away from the location of electricity demand.
 - 50.2 The size and footprint requirements of this infrastructure are often fixed and inflexible (and are directly related to the electricity demand in the immediate area). In addition, various safety and electrical standards set clearances around ground mounted equipment. Neither the equipment, nor the standards, can be amended or resized to "fit" the equipment within the space available. There is often very little opportunity to compromise on the land area required for electricity distribution infrastructure.
 - 50.3 Sourcing alternative locations for electrical infrastructure (i.e. other than on or immediately adjacent to the site which the infrastructure services) is also problematic:
 - (a) Locating infrastructure in berms or road corridors exposes equipment to vehicular traffic, clashes with existing underground infrastructure, can have adverse visual impacts on streetscape, and is generally resisted by corridor managers (e.g. Council or Waka Kotahi).
 - (b) Locating above ground infrastructure equipment in road reserves and parks is generally opposed by Council and / or Local Boards.
 - (c) Owners of adjacent sites that have sufficient land to accommodate infrastructure should not be required to accommodate it simply because development on an adjacent site requires it (and in the vast majority of cases they will not accept it on their land).
- 51 Where infill development restricts infrastructure corridors and/or individual sites and road corridors do not adequately account for the provision of infrastructure, providing a secure and reliable electricity supply to new developments can become problematic.
- 52 Infill housing and intensification is already presenting significant challenges for the location, operation, maintenance and upgrading of electricity distribution equipment

and infrastructure. Orion's experience is that in some cases developers do not approach Orion to discuss servicing matters until after plans for a development are fixed, and often after resource consent has been granted. Developers often fail to include (or set aside) sufficient space on site for the necessary infrastructure. Similarly, Orion encounters resistance from corridor managers and Council when seeking to locate new / upgraded infrastructure in the berm or local reserve.

- 53 Development enabled by the MDRS is likely to exacerbate existing issues unless appropriately managed through PC14. Ultimately, it enables more development, while making it more difficult for infrastructure providers to supply that development with critical infrastructure.

- 54 Orion seeks that PC14 contain an electricity servicing standard as outlined in Appendix B. The land area required for onsite electricity servicing is highly site specific. However, Orion has proposed a 5.5m² land area to balance the size of equipment most frequently required against the ability of landowners and developers to plan for development of their sites. Not all sites will need this space set aside, however it is important that Orion is able to consider whether it is necessary on a site-specific basis and to work with developers at an early stage. The flexibility provided with Orion's proposed relief is an efficient and effective means of ensuring infrastructure capacity requirements are met while not unduly limiting development.

- 55 Ultimately, through engagement between Orion and the developer, it may be possible that the required area is reduced and/or it may be moved away from the front boundary. Orion's proposed relief is intended to create meaningful engagement between developers and Orion early on, when intensification is in initial planning stages. In Orion's experience, early engagement is highly beneficial to all involved, as it reduces the risk of site design needing to be amended and the risk of poor infrastructure outcomes.

CONCLUSION

- 56 Orion supports recognition of the SEDL QM in PC14 but seeks refinement of provisions implementing corridor protection setbacks. In addition, Orion seeks the addition of setback requirements for lower voltage lines and provision for electricity servicing.

APPENDIX B

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

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

Suggested amendments and alternative drafting is shown in track change – Orion's requested deletions are shown using ~~red strikethrough~~ and requested insertions shown using red underline.

No.	Provision	Position	Relief requested	Explanation
1	<p>New Rule to be inserted into following zones:</p> <ul style="list-style-type: none"> MDRS Residential suburban and Residential Suburban Transition zone High Density Residential zone Residential Hills zone Future Urban zone 		<p>Insert a new rule for provision of electricity equipment and infrastructure as follows:</p> <p><u>Activity</u></p> <p><u>PX The establishment of a new, or expansion of an existing sensitive activity.</u></p> <p><u>Activity specific standards</u></p> <p>a. <u>Either a land area of at least 5.5m² is provided at the boundary closest to the road reserve for electricity equipment and infrastructure, or confirmation is provided from Orion New Zealand Limited that it is not required.</u></p> <p><u>14.5.1.4 Discretionary activities</u></p>	<p>Orion seeks a new rule be inserted to the listed zones to include an electricity servicing standard. Orion's experience is that in some cases developers do not approach Orion to discuss servicing matters until after the plans for a development are fixed, and often a resource consent has been granted. Consequently, developers often fail to set aside or include sufficient space on site for the necessary infrastructure. Similarly, Orion encounters resistance from corridor managers and Council when seeking to locate new/upgraded infrastructure within the berm or a local reserve. These existing issues are likely to be exacerbated by PC14.</p>

			<p><u>Activity</u></p> <p><u>DX</u></p> <p>a. <u>Any activity that does not meet the activity specific standard under PX.</u></p> <p>b. <u>Any application arising from this rule shall not be publicly notified and shall be limited notified only to Orion New Zealand Limited (absent its written approval).</u></p>	<p>The land area required for on-site electricity servicing is highly site specific however Orion has proposed a 4m² land area. This standard is proposed to ensure that there is engagement with developers at the initial planning stages of land use intensification.</p>
2	General – qualifying matter for Electricity Transmission and <u>Distribution</u> Corridors and Infrastructure	Support in part.	<p>Support identification of a qualifying matter for <i>Electricity Transmission Corridor and Infrastructure subject to the following amendments:</i></p> <p>General – qualifying matter for Electricity Transmission and Distribution Corridors and Infrastructure.</p>	<p>Orion generally support the approach to retain the existing operative District Plan zones and provisions in areas covered by the proposed <i>Electricity Transmission Corridor and Infrastructure</i> qualifying matter. However, Orion considers adjustments are required to specifically reference electricity distribution.</p>
3	Planning Maps – the Spatial Extent of the Qualifying Matter	Support	<p>Retain the operative District Plan provisions within the SEDL QM rather than activity standards associated with MDRS.</p>	<p>Orion supports the spatial extent of the SEDL QM as it exists in the operative District Plan. Orion notes it is not practical to map the lower voltage lines that are sought to be included as a QM under submission point X below.</p> <p>However, Orion also seeks that the 11kV, 400V and 230V network are</p>

				also included. These lower voltage lines are the most common within any distribution network and comprise the majority of lines that are seen in any residential street. The increased building height limits and smaller boundary setbacks enabled by the MDRS have the potential to cause significant issues for large parts of this lower voltage network.
Chapter 3 – Strategic Directions				
4	Objective 3.3.13 Objective - Infrastructure	Support in Part	Amend existing Objective 3.3.13 Objective – Infrastructure as follows: ... <u>vi. managing activities to avoid adverse effects on the 11kV, 400V and 230V electricity distribution network.</u>	Orion considers that an amendment is required to recognise the need to protect and provide for infrastructure such as the lower voltage significant electricity distribution network,
5	Chapter 6.1A Qualifying Matters Table 1 Chapter 14 Residential	Support.		Orion supports identification of <i>Electricity Transmission Corridor and Infrastructure</i> as a qualifying matter in PC14.
6	Chapter 6.1A Qualifying Matters Table 1 Chapter 15 Commercial	Support.		Orion supports identification of Electricity Transmission and Distribution Corridors as a qualifying matter in PC14.

Chapter 14 - Residential				
7	Policy 14.2.3.2	Support.	Retain as notified.	Orion supports this policy as notified. PC14 includes Electricity Transmission Corridors and Infrastructure as a qualifying matter. It is appropriate to recognise that MDRS apply in all relevant residential zones except in circumstances where a qualifying matter applies.
8	Medium Density Residential Zone	Support with amendment.	<p>Add an additional clause to NC2 and amend clause 'c' as follows:</p> <p><u>iv within 3m of the outside overhead conductor of any 11kV, 400V or 230V electricity distribution line.</u></p> <p>d. <u>Conductive F</u>ences within 5 metres of a 66kV ør, 33kV, <u>11kV, 400V or 230V</u> electricity distribution line support structure foundation.</p>	Orion supports this rule but seeks a new clause to provide setback clearances for 11kV, 400V and 230V network. These lower voltage lines are the most common within any distribution network and comprise the majority of lines that are seen in any residential street. The increased building height limits and smaller boundary setbacks enabled by the MDRS have the potential to cause significant issues for large parts of this lower voltage network.
9	Residential Suburban Zone and Residential Suburban Density Transition Zone Rule 14.4.1.5	Support with amendment.	<p>Add an additional clause to NC7 and amend clause 'c'. as follows:</p> <p><u>iii within 3m of the outside overhead conductor of any 11kV, 400V or 230V electricity distribution line.</u></p>	Orion supports this rule but seeks a new clause to provide setback clearances for 11kV, 400V and 230V network. These lower voltage lines are the most common within any distribution network and comprise the majority of lines that are seen in any residential street. The increased

			b. Conductive F fences within 5 metres of a 66kV or, 33kV, <u>11kv, 400V or 230V</u> electricity distribution line support structure foundation.	building height limits and smaller boundary setbacks enabled by the MDRS have the potential to cause significant issues for large parts of this lower voltage network.
10	Residential Hills Zone Rule 14.7.1.5 non-complying activities NC2		Add an additional clause to NC2 a. and amend clause 'b' as follows: <u>iii within 3m of the outside overhead conductor of any 11kV, 400V or 230V electricity distribution line.</u> b. Conductive F fences within 5 metres of a 66kV or, 33kV, <u>11kv, 400V or 230V</u> electricity distribution line support structure foundation.	Orion proposes a new clause to provide setback clearances for the 11kV, 400V and 230V network. These lower voltage lines are the most common within any distribution network and comprise the majority of the lines that are seen in any residential street. The increased buildings height limits and smaller boundary setbacks enabled by the MDRS have the potential to cause significant issues for large parts of the lower voltage network.
11	Future Urban Zone Rule 14.12.1.5 Non-complying activities NC2	Support with amendment	Add an additional clause to NC2 a. and amend clause 'b' as follows: <u>iv within 3m of the outside overhead conductor of any 11kV, 400V or 230V electricity distribution line.</u> b. Conductive F fences within 5 metres of a 66kV or, 33kV, <u>11kv, 400V or 230V</u> electricity distribution line support structure foundation.	Orion proposes a new clause to provide setback clearances for the 11kV, 400V and 230V network. These lower voltage lines are the most common within any distribution network and comprise the majority of the lines that are seen in any residential street. The increased buildings height limits and smaller boundary setbacks enabled by the MDRS have the potential to cause

				significant issues for large parts of the lower voltage network.
Chapter 15 Commercial				
12	Town Centre Zone Rule 15.4.1.5 Non-complying activities	Support with amendment	<p>Add an additional clause to NC3 a. and amend clause 'd' as follows:</p> <p><u>iii within 3m of the outside overhead conductor of any 11kV, 400V or 230V electricity distribution line.</u></p> <p>d. <u>Conductive</u> Fences within 5 metres of a National Grid transmission line support structure foundation, 66kV or, 33kV, <u>11kv, 400V or 230V</u> electricity distribution line support structure foundation.</p>	Orion proposes a new clause to provide setback clearances for the 11kV, 400V and 230V network. These lower voltage lines are the most common within any distribution network and comprise the majority of the lines that are seen in any residential street. The increased buildings height limits and smaller boundary setbacks enabled by the MDRS have the potential to cause significant issues for large parts of the lower voltage network.
13	Local Centre Zone Rule 15.5.1.5	Support with amendment	<p>Add an additional clause to NC3 a. and amend clause 'd' as follows:</p> <p><u>iii within 3m of the outside overhead conductor of any 11kV, 400V or 230V electricity distribution line.</u></p> <p>d. <u>Conductive</u> Fences within 5 metres of a National Grid transmission line support structure foundation, 66kV or, 33kV, <u>11kv, 400V or 230V</u> electricity distribution line support structure foundation.</p>	Orion proposes a new clause to provide setback clearances for the 11kV, 400V and 230V network. These lower voltage lines are the most common within any distribution network and comprise the majority of the lines that are seen in any residential street. The increased buildings height limits and smaller boundary setbacks enabled by the MDRS have the potential to cause significant issues for large parts of the lower voltage network.

14	Neighbourhood Centre Zone Rule 15.6.1.5 Non-complying activities.	Proposed amendment	Add an additional clause to NC3 a. and amend clause 'd' as follows: <u>iii within 3m of the outside overhead conductor of any 11kV, 400V or 230V electricity distribution line.</u> d. Conductive F <u>ences</u> within 5 metres of a National Grid transmission line support structure foundation, 66kV or , 33kV, <u>11kv, 400V or 230V</u> electricity distribution line support structure foundation.	Orion proposes a new clause to provide setback clearances for the 11kV, 400V and 230V network. These lower voltage lines are the most common within any distribution network and comprise the majority of the lines that are seen in any residential street. The increased buildings height limits and smaller boundary setbacks enabled by the MDRS have the potential to cause significant issues for large parts of the lower voltage network.
15	Mixed Use Zone Rule 15.10.1.5 Non-complying activities	Proposed amendment	Add an additional clause to NC2 and amend clause 'c' as follows: <u>X Sensitive activities within 3m of the outside overhead conductor of any 11kV, 400V or 230V electricity distribution line.</u> d. Conductive F <u>ences</u> within 5 metres of a 66kV or , <u>33kV, 11kv, 400V or 230V</u> electricity distribution line support structure foundation.	Orion proposes a new clause to provide setback clearances for the 11kV, 400V and 230V network. These lower voltage lines are the most common within any distribution network and comprise the majority of the lines that are seen in any residential street. The increased buildings height limits and smaller boundary setbacks enabled by the MDRS have the potential to cause significant issues for large parts of the lower voltage network.
Chapter 16 Industrial Zones				
16	Industrial General Zone	Proposed amendment	Add an additional clauses to 'NC1' and amend clause 'd' as follows:	Orion proposes a new clause to provide setback clearances for the 11kV, 400V and 230V network. These

	Rule 16.4.1.5 on-complying activities		<p><u>X Sensitive activities within 3m of the outside overhead conductor of any 11kV, 400V or 230V electricity distribution line.</u></p> <p>d. <u>Conductive</u> Fences within 5 metres of a 66kV National Grid transmission line support structure foundation or 5 metres of a 66kV electricity distribution support structure foundation or, <u>33kV, 11kv, 400V or 230V</u> electricity distribution line support structure foundation.</p>	lower voltage lines are the most common within any distribution network and comprise the majority of the lines that are seen in any residential street. The increased buildings height limits and smaller boundary setbacks enabled by the MDRS have the potential to cause significant issues for large parts of the lower voltage network.
17	Industrial Park Zone Rule 16.6.1.5	Proposed amendment	<p>Add an additional clause to 'NC3' and amend clause 'd' as follows:</p> <p><u>X Sensitive activities within 3m of the outside overhead conductor of any 11kV, 400V or 230V electricity distribution line.</u></p> <p>d. <u>Conductive</u> Fences within 5 metres of a 66kV electricity distribution support structure foundation or, <u>33kV, 11kv, 400V or 230V</u> electricity distribution line support structure foundation.</p>	Orion proposes a new clause to provide setback clearances for the 11kV, 400V and 230V network. These lower voltage lines are the most common within any distribution network and comprise the majority of the lines that are seen in any residential street. The increased buildings height limits and smaller boundary setbacks enabled by the MDRS have the potential to cause significant issues for large parts of the lower voltage network.

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Mark

Last name:

Arbuthnot

Organisation:

Lendlease Limited

Preferred method of contact

Email

Attached Documents

Name
Lendlease - Proposed Plan Change 14 submission Final

Form 5
Submission on notified proposal for policy statement or plan, change or variation
Clause 6 of Schedule 1, Resource Management Act 1991

To: Christchurch City Council
PO Box 73012
Christchurch 8154

Name of submitter: Lendlease New Zealand Limited (“**Lendlease**”)

- 1.1 This is a submission on a change proposed to the following proposed plan (the **proposal**):
 - Proposed Housing and Business Choice Plan Change (“**PC14**”) to the Christchurch District Plan.
- 1.2 Lendlease could not gain an advantage in trade competition through this submission.
- 1.3 Lendlease’s submission relates to PC14 in its entirety, but in particular:
 - The proposed Town Centre zoning of Hornby.
 - The amendments to Chapter 15 (Commercial) that relate to giving effect to Policy 3 of the National Policy Statement for Urban Development (“**NPS-UD**”).

Background

- 1.4 Lendlease owns and operates the Dress Smart Mall located at 411 Main South Road and 6 & 12 Shands Road, Hornby. The Dress Smart Mall comprises a gross leasable floor area of over 7,000m² of outlet retail activity on a 1.2ha site.
- 1.5 Hornby commercial centre has an area of approximately 13.3ha and is occupied by 87,800m² of commercial floor space, of which 70,800m² is in retail use. Its two shopping centres (The Hub and Dress Smart) have a combined gross floor area of approximately 27,000m² and attract visitors from all over Christchurch and the surrounding districts, making it a significant commercial hub in the region.
- 1.6 Hornby is located at the intersection of several major transport routes, including the Southwestern Motorway and Main South Road. Waka Kotahi’s commuter information (based on the 2018 Census dataset) confirms that 5,949 people travel to Hornby Central for work or school. People travel to Hornby from 190 different areas, including from within the sub-region (Rolleston, Prebbleton, and Lincoln, and to a lesser extent, Darfield, Southbridge, Kaiapoi and Woodend).
- 1.7 Its location therefore enables it to serve the greater Christchurch area.
- 1.8 The area is also serviced by the soon to be completed Matatiki: Hornby Centre (a \$40M community facility that includes, a library, swimming pool, hydrotherapy pool, customer services, and multi-purpose rooms) and is the home of the Denton Park Velodrome; one of only two velodromes in the South Island, and has hosted numerous national and international cycling events, including the New Zealand National Track Cycling Championships and the Oceania Track Cycling Championships.

- 1.9 Hornby therefore functions as a metropolitan centre, being a key destination for a large catchment area that extends beyond its immediate and adjoining suburbs. It is a focal point for the surrounding sub-regional urban catchment, and with more than 12,000 new homes expected in Christchurch's south-west by 2044, it has the potential to become a more prominent metropolitan centre in the future.

Submission

- 1.10 Lendlease generally supports the proposal, subject to the amendments set out below and within the attached Schedule 1 and Schedule 2.
- 1.11 Hornby currently functions as a metropolitan centre, providing a focal point for the surrounding sub-regional urban catchment and servicing the needs of more than the immediate and adjoining suburbs. To achieve a well-functioning urban environment, any rezoning decisions in respect of Hornby must recognise the metropolitan/sub-regional status of the centre, rather than seeking to limit it to a town centre status.
- 1.12 Lendlease's submission seeks to ensure that the proposal appropriately recognises and provides for the sub-regional urban catchment of Hornby and is enabling of metropolitan levels of development.
- 1.13 While not specifically addressed within this submission, some other large Town Centres, such as Riccarton and Papanui, may also meet the status of a Metropolitan Centre and should be zoned accordingly.

Rezoning of Hornby Commercial Core Zone to Town Centre Zone

- 1.14 The National Planning Standards 2019 ("NPS") describes the Town Centre Zone as:¹

Areas used predominantly for:

- in smaller urban areas, a range of commercial, community, recreational and residential activities.
- in larger urban areas, a range of commercial, community and recreational and residential activities that service the needs of the immediate and neighbouring suburbs.

- 1.15 Whereas the NPS describes the Metropolitan Centre Zone as:²

Areas used for predominantly for a broad range of commercial, community, recreational and residential activities. The zone is a focal point for sub-regional urban catchments.

- 1.16 The proposal seeks to rezone the "Hornby Commercial Core Zone" to "Town Centre Zone" and increase the maximum permitted height limit from 20m to 22m *"to reflect the increased level of commercial activities and community services in these centres in comparison to other centres"*.³

¹ Pg.37; Chapter 8. Zone Framework Standard; National Planning Standards; November 2019.

² Ibid.

³ Pg.41; Commercial and Industrial Sub-Chapters Evaluation Report.

- 1.17 Hornby (and district centres of Riccarton and Papanui) is more than twice the size of the other town centres at Linwood, Belfast, Shirley and North Halswell. Unlike these other town centres, Hornby has been assessed by the proposal to be of sufficient size to draw significant trade from adjoining districts (around 20%) and having more than 50% of its retail spend from outside a 5km catchment,⁴ and draws people from within the sub-region for work.
- 1.18 Despite this, Hornby has not been provided with a “Metropolitan Centre Zone”.
- 1.19 The proposal advises that the most appropriate approach is to not identify any metropolitan centres, based on the actual current range of activities (commercial, community, residential and recreational) within the centre zones.⁵ Although, it does recognise that in the long term, as matters such as Mass Rapid Transit and the regional Spatial Plan are developed, “...it may be appropriate to reassess the context for some centres (likely... Hornby...) and potentially make the case for these centres being defined as Metropolitan centres”.⁶
- 1.20 The proposal did consider whether Hornby should be identified as a metropolitan centre based on its large retail floor space and wider employment base compared to other town and neighbourhood centres. However, it concluded that it did not satisfactorily meet the sub-regional catchment in relation to existing community or recreational facilities.⁷
- 1.21 Given that the purpose of the Town Centre Zone is limited to serving both immediate and neighbouring suburbs (as opposed to a sub-regional catchment), the proposal represents a significant constraint on the function and future growth of the Hornby commercial area.
- 1.22 While the proposal raises concern in respect of the current level of commercial activity, this does not derogate from the fact that Hornby already services a large sub-regional urban catchment, which will continue to grow in the future. Enabling metropolitan levels of growth within the centre will assist with the further diversification of the commercial offering within the centre. As acknowledged by the Economic Cost Benefit Analysis that supports the proposal:⁸
- The proposed height-increase options considered, 32m or 50m, may encourage additional employment as the area is (re)developed to greater scale. The increase in heights enables more intense commercial office employment (i.e., more floors → more offices → more employees) and any investment in the built form or increase in foot traffic of the area will encourage further retail activity and employment.
- 1.23 Turning to recreational facilities, Denton Park is a regionally significant recreational facility that is more than of local significance. Zoned “Open Space Metropolitan Facilities”, it is intended to “...accommodate public and private major sports

⁴ Para. 4.3.24; Section 32: Commercial Appendix 2 Approach to Alignment with National Planning Standards.

⁵ Ibid.

⁶ Para. 4.3.25; Ibid.

⁷ Para. 4.3.26; Ibid.

⁸ Pg.44; Christchurch Central City and Suburban Centres (PC14) Economic Cost Benefit Analysis; Property Economics; July 2022.

facilities, larger recreation facilities” on sites that provide “Capacity for multifunctional use, co-location of complementary or compatible activities and for hosting city, regional, national and international events which provide entertainment to residents and visitors”.⁹

- 1.24 Major sports facilities, community activities and facilities, accessory conference and function facilities, and accessory visitor accommodation (to name but a few) are all provided for as a permitted activity within the Open Space Metropolitan Facilities zone. Plainly, the District Plan provides the necessary framework to enable the future development of community and recreational facilities within Hornby to support future metropolitan levels of growth.
- 1.25 Further, while not necessarily of sub-regional significance, Hornby will be supported by civic and community facilities through the new Matatiki: Hornby Centre.
- 1.26 The most appropriate method to enable Hornby’s future growth, including a commensurate level of commercial activity and community and recreational services, is through the intensification and diversification opportunities delivered through the application of the Metropolitan Centre Zone to the Hornby Commercial Core.
- 1.27 Lendlease therefore seeks that the proposal rezones the Hornby “Commercial Core Zone” to “Metropolitan Centre Zone”.
- 1.28 Up-zoning to the “Metropolitan Centre Zone” will also require Council to undertake an assessment of intensification within its walkable catchment as required by Policy 3(c) of the National Policy Statement in Urban Development 2020 (“NPS-UD”).
- 1.29 Consequential changes to the proposal have been identified as being necessary to incorporate the “Metropolitan Centre Zone” into the proposal, this may also include zoning other town centres to metropolitan centre.
- 1.30 The changes to address Lendlease’s concerns are contained in Schedule 1 and Schedule 2.
- 1.31 In addition to the specific reasons above, Lendlease considers that applying a new Metropolitan Centre Zone to Hornby:
 - (a) will give effect to the objectives and policies of the NPS-UD;
 - (b) will contribute to well-functioning urban environments;
 - (c) is consistent with the sustainable management of physical resources and the purpose and principles of the Resource Management Act 1991 (“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

- 1.32 Lendlease seeks the following decision from the local authority:

⁹ Table 18.2.2.1; Christchurch District Plan.

- (a) That the proposal be amended as set out within Schedule 1 and Schedule 2 of this submission.
 - (b) In the alternative, amend the provisions of the Town Centre Zone to provide for greater intensification within that zone, or specifically to the Hornby Town Centre Zone consistent with the provisions sought for the new Metropolitan Centre Zone.
 - (c) Such further or other consequential relief as may be necessary to fully give effect to the relief sought in this submission.
- 1.33 Lendlease wishes to be heard in support of this submission.
- 1.34 If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.

Dated 12 May 2023

Signature by its planning and resource management consultants and authorised agents Bentley & Co. Ltd.



Mark Arbuthnot

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Schedule 1

Detailed submissions and
relief sought

Schedule 1: Detailed submissions and relief sought

Relief sought by the submitter is shown in ~~strike through~~ and underline

	Provision	Submission	Relief Sought
	Planning Maps		
1.	Town Centre Zone, Hornby	<p>Oppose.</p> <p>For the reasons discussed within the submission, Lendlease is opposed to the rezoning of the Hornby Commercial Core Zone to Town Centre Zone.</p> <p>Hornby services a sub-regional urban catchment, drawing significant trade from adjoining districts and having a more than 50% of its retail spend from outside a 5km catchment. Waka Kotahi's commuter information confirms that nearly 6,000 people travel to Hornby for work or school from 190 different areas, including from within the sub-region.</p> <p>It is also serviced by a regionally significant recreational facility, which is zoned "Open Space Metropolitan Facilities" and provides the necessary framework to enable the future development of community and recreational facilities within Hornby to support its future growth.</p> <p>The most appropriate method to recognise Hornby's existing role and function and enable Hornby's future growth, including a commensurate level of commercial activity and community and recreational services, is through the intensification and diversification opportunities delivered through the rezoning of the Town Centre Zone at Hornby to Metropolitan Centre Zone.</p>	<p>Rezone the Town Centre Zone to Metropolitan Centre Zone, as it relates to Hornby, as follows:</p>  <p>= Metropolitan Centre Zone</p>
2.	Hornby Walkable Catchment	Up-zoning to the Metropolitan Centre Zone will also require Council to undertake an assessment of intensification within a walkable catchment of the	Undertake an assessment of intensification within a walkable catchment of Hornby Metropolitan Centre and

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	Provision	Submission	Relief Sought
		Metropolitan Centre zone as required by Policy 3(c) of the NPS-UD. Building heights of at least 6 storeys are required within at least a walkable catchment of the edge of Metropolitan Centre Zones and the provisions applying to the surrounding commercial and residential zoning needs to be adjusted	enable building heights of at least 6 storeys within that area.
3.	Other Town Centre Zones	For similar reasons discussed within this submission, some other large Town Centres, such as Riccarton and Papanui, may also meet the status of a Metropolitan Centre and should be zoned accordingly.	Review the extent of the Town Centre Zone to determine whether the larger centres should be rezoned Metropolitan Centre Zone.
Chapter 1 Introduction			
4.	1.3.4.2 Long Term Plan, the 3 Year Plan and Annual Plan	Support	Retain changes to 1.3.4.2 as notified.
Chapter 2 Abbreviations and Definitions			
5.	Whole Chapter	Except where specified below, Lendlease supports the amendments proposed to Chapter 2, as notified.	Retain Chapter 2 as notified, except where specified below.
6.	Commercial Centre	Support in part. Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. A consequential change is required to the definition of “Commercial Centre” to include reference to the “Metropolitan Centre Zone”.	Amend the definition of “Commercial Centre” to include reference to the “Metropolitan Centre Zone”, as follows: Commercial Centre means the city centre, <u>metropolitan centres</u> , town centres, local centres, neighbourhood centres and large format centres zoned City Centre, <u>Metropolitan Centre</u> , Town Centre, Local Centre, Neighbourhood Centre, Commercial Banks Peninsula and Large Format Retail zone.

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	Provision	Submission	Relief Sought
7.	Commercial Zones	<p>Support in part.</p> <p>For the reasons discussed at item 6, above, as consequential change is required to the definition of “Commercial Zones” to include reference to the “Metropolitan Centre Zone”.</p>	<p>Amend the definition of “Commercial Zones” to include reference to the “Metropolitan Centre Zone”, as follows:</p> <p>Commercial Zones means the followings zones: Town Centre Zone, Local Centre Zone, Neighbourhood Centre Zone, Commercial Banks Peninsula Zone, Large Format Retail Zone, Commercial Office Zone, Mixed Use Zone, <u>Metropolitan Centre Zone</u>, City Centre Zone, Central City Mixed Use Zone and Central City Mixed Use (South Frame) Zone.</p>
8.	Habitable room	<p>Support in part.</p> <p>While Lendlease understands that the term “habitable room” is intended to be used in respect of the establishment of residential units within the Annual Aircraft Noise Contour and Engine Testing Contour, the reference to “office” within the definition is unqualified and has the potential to be interpreted as including commercial office space.</p> <p>Consistent with the purpose of the rule that the definition supports, Lendlease considers that the definition requires clarification and should be amended to reference “home office”.</p>	<p>Amend the definition of “Habitable room” as follows:</p> <p>Habitable room means any room used for the purposes of teaching or used as a living room, dining room, sitting room, bedroom, <u>home</u> office or other room specified in the District Plan to be a similarly occupied room.</p>
9.	Human scale	<p>Support in part.</p> <p>While Lendlease recognises that the term “human scale” needs to be read in the context of the policies that apply, the inclusion of the words “and lower building heights” implies that a reduction in building</p>	<p>Amend the definition of “Human scale” to remove the words “and lower building heights”, as follows:</p> <p>Human scale means incorporating dimensions that result in smaller built components and lower building heights, with</p>

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	Provision	Submission	Relief Sought
		<p>height, below that permitted by the plan could be necessary to achieve “human scale”.</p> <p>Such an outcome would run counter to the requirements of Policy 3 of the NPS-UD and is not supported. Amendments are therefore required to this definition to remove the words “and lower building heights”.</p>	<p>attention to the human experience from eye level, relative to the physical size of a person.</p>
10.	Key Activity Centres	<p>Support in part.</p> <p>For the reasons discussed at item 6, above, as consequential change is required to the definition of “Key Activity Centres” to include reference to the “Metropolitan Centre Zone”.</p>	<p>Amend the definition of “Key Activity Centres” to include reference to the “Metropolitan Centre Zone”, as follows:</p> <p>Key Activity Centres means...</p> <p>...</p> <p>The key activity centre in each location is land zoned either <u>Metropolitan Centre</u>, Town Centre or Local Centre Zone.</p>
11.	New definition: Metropolitan Centre	<p>Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. Consistent with the proposed definitions for other centres, a definition of “Metropolitan Centre” is required to align with the description provided within the NPS.</p> <p>While Lendlease has identified that Hornby functions as a Metropolitan Centre, other large Town Centres, such as Riccarton and Papanui, may also meet the status of a Metropolitan Centre and should be identified in the definition.</p>	<p>Insert a new definition of Metropolitan Centre as follows:</p> <p><u>Metropolitan Centre means areas used predominantly for a broad range of commercial, community, recreational and residential activities. The zone is a focal point for sub-regional urban catchments.</u></p> <p><u>The Metropolitan Centre zone includes the Key Activity Centres at Hornby, [other].</u></p>
12.	Town Centre	Support in part.	Amend the definition of Town Centre as follows and provide for any other consequential amendments

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	Provision	Submission	Relief Sought
		<p>The definition of Town Centre does not align with the description of the NPS. Aligning the definition of a with the description in the National Planning Standards will ensure that the proposal is consistent with this framework.</p> <p>It will also ensure that stakeholders, such as developers, residents, and businesses, have a clear understanding of what is meant by this term. This will reduce confusion and improve a consistent application of the District Plan.</p> <p>Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. A consequential change is required to the definition of “Town Centre” to delete the reference to Hornby.</p>	<p>following the review of the other Town Centres sought in item 3 above:</p> <p>Town Centre means <u>areas used predominantly for:</u></p> <ul style="list-style-type: none"> • <u>in smaller urban areas, a range of commercial, community, recreational and residential activities.</u> • <u>in larger urban areas, a range of commercial, community, recreational and residential activities that service the needs of the immediate and neighbouring suburbs.</u> <p>The Town Centre zones includes the centres at Belfast/Northwood, Eastgate/Linwood, Hornby, North Halswell, Papanui/Northlands, Riccarton, Shirley / Palms.</p>
13.	Neighbourhood Centre	For the reasons discussed at item 12 above, amendments are required to the definition of Neighbourhood Centre to ensure that it aligns with the description of the NPS.	<p>Amend the definition of Neighbourhood Centre, as follows:</p> <p>Means the areas zoned Neighbourhood Centre <u>Areas used predominantly for small-scale commercial and community activities that service the needs of the immediate residential neighbourhood.</u></p>
14.	Local Centre	For the reasons discussed at item 12 above, amendments are required to the definition of Local Centre to ensure that it aligns with the description of the NPS.	<p>Amend the definition of Local Centre, as follows:</p> <p>means:</p> <p><u>Areas used predominantly for a range of commercial and community activities that service the needs of the residential catchment.</u></p>

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	Provision	Submission	Relief Sought
			<p><u>Includes</u> the Local Centre zone at Addington, Avonhead, Beckenham, Bishopdale, Colombo/Beaumont, Cranford, Edgware, Fendalton, Ferryhead, Halswell, Hillmorton, Ilam/Clyde, Merivale, New Brighton, Northwest Belfast, Parklands, Prestons, Redcliffs, Richmond, Linwood Village, Barrington, St Martins, Sumner, Sydenham North, Sydenham South, Wairakei/Greers Road, Wigram, Woolston and Yaldhurst;</p> <p>and</p> <p>the Commercial Banks Peninsula Zone at Lyttelton and Akaroa.</p>
15.	Large format centre	For the reasons discussed at item 12 above, amendments are required to the definition of Large format centre to ensure that it aligns with the description of the NPS.	<p>Amend the definition of large format centre, as follows:</p> <p>Large format centre <u>retail zone</u> Means <u>areas used predominantly for commercial, community, recreational and residential activities.</u></p> <p><u>Includes</u> those commercial centres at Moorhouse Avenue, Shirley Homebase, Tower Junction, Northlink Papanui, SupaCenta Belfast and Chappie Place Hornby zoned Large Format Retail Zone on the planning maps.</p>
	Chapter 3 Strategic Directions		
16.	Whole Chapter	Except where specified below, Lendlease supports the amendments proposed to Chapter 3, as notified.	Retain Chapter 3 as notified, except where specified below.
17.	Objective 3.3.7 Well-functioning Urban Environment	Support in part. For the reasons discussed at item 6, above, as consequential change is required to Objective 3.3.7 to include reference to the “Metropolitan Centre Zone”.	<p>Amend Objective 3.3.7 to include reference to the Metropolitan Centre Zone, as follows:</p> <p>3.3.7 Objective – Well-functioning urban environment</p> <p>a. A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for</p>

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	Provision	Submission	Relief Sought									
			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: ... E. The largest scale and density of development, outside of the city centre, provided within and around <u>metropolitan centres and</u> town centres, and lessening scale for centres lower in the hierarchy; ...									
	Chapter 6.1A Qualifying Matters											
18.	Whole chapter	Lendlease supports Chapter 6.1A Qualifying Matters as notified.	Retain Chapter 6.1A as notified.									
	Chapter 6.1 Noise											
19.	Whole chapter	Lendlease supports the changes to Chapter 6.1 as notified.	Retain Chapter 6.1 as notified.									
	Chapter 6.3 Lighting											
20.	Whole chapter	Lendlease supports the changes to Chapter 6.3 as notified.	Retain Chapter 6.3 as notified.									
	Chapter 6.8 Signs											
21.	Whole chapter	Except where specified below, Lendlease supports the amendments proposed to Chapter 6.8, as notified.	Retain Chapter 6.8 as notified, except where specified below.									
22.	6.8.4.1.1 Permitted activities	Support in part. Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. Consequential changes are required to the permitted activities to include reference to “Metropolitan Centre”.	Amend the table contained in 6.8.4.1.1 to include reference to “Metropolitan Centre”, as follows: <table><tr><td></td><td>Activity</td><td>Activity Specific standards</td></tr><tr><td>...</td><td>...</td><td>...</td></tr><tr><td>P8</td><td>Business and building identification signs made of three</td><td>...</td></tr></table>		Activity	Activity Specific standards	P8	Business and building identification signs made of three	...
	Activity	Activity Specific standards										
...										
P8	Business and building identification signs made of three	...										

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Provision		Submission	Relief Sought		
		No additional signage opportunity is sought to be enabled, beyond that which can currently be established within the Commercial Core Zone at Hornby.		dimensional letters and/or symbols in: ... b. all commercial zones other than: <u>ai. the Metropolitan Zone;</u> i. the Town or Local Centre Zone in a Key Activity Centre where the maximum building height is 20 metres; ...	
			P9	Business and building identification signs made of three dimensional letters and/or symbols in: <u>aa. the Metropolitan Centre Zone;</u> a. Town Centre or Local Centre Zones in Key Activity Centres where the maximum building height is 20 metres;
23.	6.8.4.2.4 Signs attached to buildings	Support in part. Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. Consequential changes are required to the signage standards to include reference to “Metropolitan Centre”.	Amend the table contained in 6.8.4.2.4 to include reference to “Metropolitan Centre”, as follows:		
			Zone or scheduled activity	Maximum total area of signs per building	Maximum height above ground level at top of sign

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Provision		Submission	Relief Sought			
		No additional signage opportunity is sought to be enabled, beyond that which can currently be established within the Commercial Core Zone at Hornby.	
			Town Centre <u>Metropolitan Centre</u> or Local Centre Zone (Hornby and The Palms Mall only)	Length along primary building frontage (m) x 1m	Where the maximum height standard is 20 metres, 9 metres or façade height, whichever is lower. Where the maximum height standard is 12 metres, 6 metres or façade height, whichever is lower	
			
24.	6.8.4.2.6 Freestanding signs	Support in part. Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. Consequential changes are required to the freestanding signage standards to include reference to “Metropolitan Centre”. No additional signage opportunity is sought to be enabled, beyond that which can currently be established within the Commercial Core Zone at Hornby.	Amend the table contained in 6.8.4.2.6 to include reference to “Metropolitan Centre”, as follows:			
			Zone or scheduled activity	Pedestrian entrance	Relating to Pedestrian Entrances	Relating to Vehicle Entrances
		
			<u>Metropolitan Centre</u> , Town Centre or Local Centre Zone	1 for each formed vehicle access (refer to Rule 6.8.4.2.6 c. and d. below) and 1 for each formed pedestrian	Max width: 1 metre Max total area: 2m ² Max height above ground level	Max width: 2.5 metres (other than billboards permitted under Rule 6.8.4.1.1 P15) Max total area:

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	Provision	Submission	Relief Sought												
				entrance (refer to Rule 6.8.4.2.6 d. below), (other than billboards permitted under Rule 6.8.4.1.1 P15)	at top of sign: 2 metres	18m ² Max height above ground level at top of sign: 9 metres									
											
	Chapter 7 Transport														
25.	Whole chapter	Lendlease supports the changes to Chapter 7 as notified.	Retain Chapter 7 as notified.												
	Chapter 8 Subdivision, Development and Earthworks														
26.	Whole chapter	Except where specified below, Lendlease supports the amendments proposed to Chapter 8, as notified.	Retain Chapter 8 as notified, except where specified below.												
27.	8.6.1 Minimum net site area and dimension	Support in part. Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. Consequential changes are required to the subdivision standards to include reference to “Metropolitan Centre”. No additional subdivision opportunity is sought to be enabled, beyond that which can currently be undertaken within the Commercial Core Zone at Hornby.	Amend Table 2 of 8.6.1 to include reference to the Metropolitan Centre Zone, as follows: <table><tr><td></td><td>Zone</td><td>Minimum net site area</td></tr><tr><td>a.</td><td><u>Metropolitan Centre Zone</u>, Neighbourhood Centre Zone, Local Centre Zone, Town Centre Zone, Commercial Office, Mixed Use Zone, Large Format Retail Zone, and Commercial Banks Peninsula Zones</td><td>250m²</td></tr><tr><td>...</td><td>...</td><td>...</td></tr></table>					Zone	Minimum net site area	a.	<u>Metropolitan Centre Zone</u> , Neighbourhood Centre Zone, Local Centre Zone, Town Centre Zone, Commercial Office, Mixed Use Zone, Large Format Retail Zone, and Commercial Banks Peninsula Zones	250m ²
	Zone	Minimum net site area													
a.	<u>Metropolitan Centre Zone</u> , Neighbourhood Centre Zone, Local Centre Zone, Town Centre Zone, Commercial Office, Mixed Use Zone, Large Format Retail Zone, and Commercial Banks Peninsula Zones	250m ²													
...													
28.	8.6.2	Support in part.	Amend Table 6 of 8.6.2 to include reference to the Metropolitan Centre Zone, as follows:												

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	Provision	Submission	Relief Sought												
	Allotments with existing or proposed buildings	<p>Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. Consequential changes are required to the subdivision standards to include reference to “Metropolitan Centre”.</p> <p>No additional subdivision opportunity is sought to be enabled, beyond that which can currently be undertaken within the Commercial Core Zone at Hornby.</p>	<table><tr><td></td><td>Zone</td><td>Minimum net site area</td></tr><tr><td>...</td><td>...</td><td>...</td></tr><tr><td>h.</td><td>Industrial General, Industrial Heavy, Industrial Park, Commercial Office, Neighbourhood Centre, Local Centre, Town Centre, <u>Metropolitan Centre</u>, City Centre Commercial Banks Peninsula, Mixed use, Central City Mixed Use and Large Format Zones</td><td>No minimum</td></tr><tr><td>...</td><td>...</td><td>...</td></tr></table>		Zone	Minimum net site area	h.	Industrial General, Industrial Heavy, Industrial Park, Commercial Office, Neighbourhood Centre, Local Centre, Town Centre, <u>Metropolitan Centre</u> , City Centre Commercial Banks Peninsula, Mixed use, Central City Mixed Use and Large Format Zones	No minimum
	Zone	Minimum net site area													
...													
h.	Industrial General, Industrial Heavy, Industrial Park, Commercial Office, Neighbourhood Centre, Local Centre, Town Centre, <u>Metropolitan Centre</u> , City Centre Commercial Banks Peninsula, Mixed use, Central City Mixed Use and Large Format Zones	No minimum													
...													
29.	8.9.2.1 Permitted activities - earthworks	<p>Support in part.</p> <p>Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. Consequential changes are required to the earthworks standards to include reference to “Metropolitan Centre”.</p> <p>No additional earthworks volumes are sought, beyond that which can currently be undertaken within the Commercial Core Zone at Hornby.</p>	<p>Amend Table 9 of 8.9.2.1 to include reference to the Metropolitan Centre Zone, as follows:</p> <table><tr><td colspan="2">Zone/Overlay</td><td>Volume</td></tr><tr><td>...</td><td>...</td><td>...</td></tr><tr><td>e. Commercial / Industrial</td><td>ii. <u>Metropolitan Centre</u>, Local Centre, Town Centre, Commercial Office, Commercial Mixed use, Central City Mixed Use, Mixed Use (South Frame), Large Format Retail, Industrial General, Industrial Heavy and Industrial Park Zones.</td><td>1000m³/ha</td></tr><tr><td>...</td><td>...</td><td>...</td></tr></table>	Zone/Overlay		Volume	e. Commercial / Industrial	ii. <u>Metropolitan Centre</u> , Local Centre, Town Centre, Commercial Office, Commercial Mixed use, Central City Mixed Use, Mixed Use (South Frame), Large Format Retail, Industrial General, Industrial Heavy and Industrial Park Zones.	1000m³/ha
Zone/Overlay		Volume													
...													
e. Commercial / Industrial	ii. <u>Metropolitan Centre</u> , Local Centre, Town Centre, Commercial Office, Commercial Mixed use, Central City Mixed Use, Mixed Use (South Frame), Large Format Retail, Industrial General, Industrial Heavy and Industrial Park Zones.	1000m³/ha													
...													

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	Provision	Submission	Relief Sought
	Chapter 15 Commercial		
30.	Whole chapter	Except where specified below, Lendlease supports the amendments proposed to Chapter 15, as notified.	Retain Chapter 15 as notified, except where specified below.
31.	15.1 Introduction	<p>Support in part.</p> <p>Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. Consequential changes are required to the introduction to include reference to “Metropolitan Centre”.</p>	<p>Amend 15.1 Introduction to include reference to the “Metropolitan Centre Zone”, as follows:</p> <p>15.1 Introduction</p> <p>...</p> <p>d. This chapter seeks to manage commercial activity in the City through a 'centres-based' approach. The hierarchy of centres comprises the City Centre, <u>Metropolitan Centres</u>, Town Centres, Local Centres, Neighbourhood Centres, and Large Format Centres. The ‘centres-based’ approach gives primacy to the City Centre and recognises its role as a principal employment and business centre for the City and surrounding region. Existing commercial activity in existing office parks and mixed use zones is also recognised.</p>
32.	15.2.2 Objective - Centres-based framework for commercial activities	<p>Support in part.</p> <p>Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. Consequential changes are required to the objective to include reference to “Metropolitan Centre”.</p> <p>Amendments to the objective are also required to ensure that the description of the role of each type of centre is consistent with that of the National Planning Standards 2019.</p>	<p>Amend Objective 15.2.2 to include reference to the “Metropolitan Centre Zone” as follows:</p> <p>15.2.2 Objective – Centres-based framework for commercial activities</p> <p>a. Commercial activity is focussed within a network of centres (comprising the City Centre, <u>Metropolitan Centres</u>, Town Centres, Local Centres, Neighbourhood Centres, and Large Format Centres) to meet the wider community’s and businesses' needs in a way and at a rate that:</p> <p>i. supports intensification within centres;</p>

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	Provision	Submission	Relief Sought
			<ul style="list-style-type: none"> ii. enables the efficient use and continued viability of the physical resources of commercial centres and promotes their success and vitality, reflecting their critical importance to the local economy; iiia. <u>supports the function of the Metropolitan Centres as focal points for a broad range of commercial, community, recreational and residential activities, servicing the sub-regional needs of communities, businesses and residents;</u> iii. supports the function of Town Centres as major focal points for commercial activities, entertainment activities, visitor accommodation, employment, transport and community activities <u>that service the needs of the immediate and neighbouring suburbs</u>, and Local Centres as a focal point for primarily small-scale commercial activities with a focus on convenience shopping, community activities and guest accommodation <u>that service the needs of the residential catchment</u>; iv. gives primacy to the City Centre followed by <u>Metropolitan Centres</u>, Town Centres and Local Centres identified as Key Activity Centres; v. is consistent with the role of each centre as defined in 15.2.2.1 Policy – Role of centres Table 15.1; vi. supports a compact and sustainable urban form that provides for the integration of commercial activity with guest accommodation, community activity, residential activity and recreation activity in locations accessible by a range of modes of transport;

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	Provision	Submission	Relief Sought
			<ul style="list-style-type: none"> vii. supports the recovery of centres that sustained significant damage or significant population loss from their catchment, including the City Centre, Linwood, and Local Centres subject to 15.2.4.3 Policy Suburban centre master plans; viii. enhances their vitality and amenity and provides for a range of activities and community facilities; ix. manages adverse effects on the transport network and public and private infrastructure; x. is efficiently serviced by infrastructure and is integrated with the delivery of infrastructure; and xi. recognises the values of, and manages adverse effects on, sites of Ngāi Tahu cultural significance identified in Appendix 9.5.6 and natural waterways (including waipuna).
33.	15.2.2.1 Policy – Role of centres	<p>Support in part.</p> <p>Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. Consequential changes are required to the policy to include reference to “Metropolitan Centre”.</p> <p>Amendments to the policy are also required to ensure that the description of the role of each type of centre is consistent with that of the National Planning Standards 2019.</p> <p>Consequential changes to the policy may also be required following the completion of the review of the other Town Centres, identified at item 3, above.</p>	<p>Amend Policy 15.2.2.1 and Table 15.1 to include reference to the “Metropolitan Centre Zone”, as follows, including any consequential changes as a result of the review of the other Town Centres, identified at item 3, above:</p> <p>15.2.2.1 Policy – Role of centres</p> <ul style="list-style-type: none"> a. Recognise and manage commercial centres as the focal points for the community and business through intensification within centres that reflects their functions and catchment sizes, and in accordance with a framework that: <ul style="list-style-type: none"> i. gives primacy to, and supports, the recovery of the City Centre, followed by <u>Metropolitan Centres</u> and <u>Key Activity Centres</u>, by managing the size

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Provision	Submission	Relief Sought									
		<p>of all centres and the range and scale of activities that locate within them;</p> <p>ii. supports and enhances the role of Town Centres; and</p> <p>iii. maintains the role of Local Centres, Neighbourhood Centres and Large Format Centres.</p> <p>as set out in Policy 15.2.2.1, Table 15.1 – Centre’s role.</p> <p>Table 15.1 – Centre’s role</p> <table> <tr> <th></th><th>Role</th><th>Centre and size (where relevant)</th></tr> <tr> <td>A.</td><td>Central Business District ...</td><td>Centre: City Centre</td></tr> <tr> <td><u>AA.</u></td><td> <u>Metropolitan Centre</u> <u>Used predominantly for a broad range of commercial, community, recreational and residential activities and is a focal point for sub-regional urban catchments.</u> <u>Serves as a hub for commercial growth and development, community interaction, and high-frequency transportation services. These centres are second in scale and intensity only to the Central Business District.</u> <u>Plays a significant role in accommodating growth and</u> </td><td><u>Centres: Hornby</u></td></tr> </table>		Role	Centre and size (where relevant)	A.	Central Business District ...	Centre: City Centre	<u>AA.</u>	<u>Metropolitan Centre</u> <u>Used predominantly for a broad range of commercial, community, recreational and residential activities and is a focal point for sub-regional urban catchments.</u> <u>Serves as a hub for commercial growth and development, community interaction, and high-frequency transportation services. These centres are second in scale and intensity only to the Central Business District.</u> <u>Plays a significant role in accommodating growth and</u>	<u>Centres: Hornby</u>
	Role	Centre and size (where relevant)									
A.	Central Business District ...	Centre: City Centre									
<u>AA.</u>	<u>Metropolitan Centre</u> <u>Used predominantly for a broad range of commercial, community, recreational and residential activities and is a focal point for sub-regional urban catchments.</u> <u>Serves as a hub for commercial growth and development, community interaction, and high-frequency transportation services. These centres are second in scale and intensity only to the Central Business District.</u> <u>Plays a significant role in accommodating growth and</u>	<u>Centres: Hornby</u>									

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Provision	Submission	Relief Sought
		<p><u>intensification, providing for a diverse range of commercial, cultural, community, civic, leisure, high-density residential, and tourist activities.</u></p> <p><u>Is a suitable locations for commercial activities of all sizes.</u></p> <p><u>The extent of the centre is the Metropolitan Centre Zone.</u></p>
		<p>B. Town Centre – Key Activity Centre</p> <p><u>Used predominantly for:</u></p> <ul style="list-style-type: none"> <u>in smaller urban areas, a range of commercial, community, recreational and residential activities.</u> <u>in larger urban areas, a range of commercial, community, recreational and residential activities that service the needs of the immediate and neighbouring suburbs.</u> <p><u>Major retail destination for typically comprises comparison and convenience shopping and a focal point for employment (including offices), community activities and community facilities (including libraries, meeting places), entertainment</u></p> <p>Centres: Riccarton, Hornby, Papanui/ Northlands, Shirley/ Palms, Eastgate/ Linwood, Belfast/ Northwood, North Halswell (emerging)</p> <p>Size: Greater than 30,000m²</p>

Schedule 1: Detailed submissions and relief sought

Relief sought by the submitter is shown in ~~strike through~~ and underline

Provision		Submission	Relief Sought	
			<p>activities, food and beverage and visitor accommodation.</p> <p>High density housing is contemplated above ground floor level and around the centre.</p> <p>Anchored by large retailers including department store(s) and supermarket(s).</p> <p>Serves the needs of a wide primary catchment extending over several suburbs <u>the immediate and neighbouring suburbs</u>.</p> <p>Accessible by a range of modes of transport, including multiple bus routes. Public transport facilities, including an interchange, may be incorporated.</p> <p>The extent of the centre is the Town Centre Zone.</p>	
34.	15.2.4 Objective - Urban form, scale and design outcomes	<p>Support in part.</p> <p>Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. Consequential changes are required to the objective to include reference to “Metropolitan Centre”.</p>	<p>Amend Objective 15.2.4 to include reference to the “Metropolitan Centre Zone” as follows:</p> <p>15.2.4 Objective – Urban form, scale and design outcomes</p> <p>a. A scale, form and design of development that is consistent with the role of a centre and its</p>	

Schedule 1: Detailed submissions and relief sought

Relief sought by the submitter is shown in ~~strike through~~ and underline

	Provision	Submission	Relief Sought
			<p>contribution to city form, and the intended built form outcomes for mixed use zones, and which:</p> <ul style="list-style-type: none"> i. recognises the Central City, <u>Metropolitan Centres</u> and Town Centres as strategically important focal points for community and commercial investment; ii. contributes to an urban environment that is visually attractive, safe, easy to orientate, conveniently accessible, and responds positively to anticipated local character and context; iii. recognises the functional and operational requirements of activities and the anticipated built form; iv. manages adverse effects (including reverse sensitivity effects) on the site and surrounding environment including effects that contribute to climate change; and v. recognises Ngāi Tahu/ mana whenua values through landscaping and the use of low impact urban design, where appropriate; and vi. supports a reduction in greenhouse gas emissions.
35.	15.2.4.1 Policy – Scale and form of development	<p>Support in part.</p> <p>Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. Consequential changes are required to policy “b” to include reference to “Metropolitan Centre”.</p>	<p>Amend Policy 15.2.4.1 b to reference the “Metropolitan Centre Zone”, as follows:</p> <p>15.2.4.1 Policy – Scale and form of development ...</p> <ul style="list-style-type: none"> b. Reflect the context, character and the anticipated scale of the zone and centre’s function by: <ul style="list-style-type: none"> i. providing for the tallest buildings and greatest scale of development in the city centre to reinforce its primacy for Greater Christchurch and

Schedule 1: Detailed submissions and relief sought

Relief sought by the submitter is shown in ~~strike through~~ and underline

	Provision	Submission	Relief Sought
			<p>enable as much development capacity as possible to maximise the benefits of intensification;</p> <p>ia. <u>providing for building heights and density of urban form within metropolitan centres to reflect demand for housing and business use in those locations;</u></p> <p>ii. providing for building heights and densities within town, local and neighbourhood centres commensurate with their role and level of commercial and community activities;</p> <p>iii. for Key Activity Centres and Large Format Centres, enable larger floor plates while maintaining a high level of amenity in the centre; and</p> <p>iv. for comprehensive residential development in the Mixed Use Zone, achieve a high density scale of development that contributes to a perimeter block urban form; and</p> <p>v. manage adverse effects on the surrounding environment, particularly at the interface with residential areas, sites of Ngāi Tahu cultural significance identified in Appendix 9.5.6 and natural waterways.</p>
36.	15.3 How to interpret and apply the rules	<p>Support in part.</p> <p>Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. A consequential change to section 15.3 is required to reference the “Metropolitan Centre”.</p>	<p>Amend 15.3 to include reference to the “Metropolitan Centre Zone” as follows:</p> <p>15.3 How to interpret and apply the rules</p> <p>a. The rules that apply to activities in the various commercial zones commercial zones are contained in the activity status tables (including activity specific standards) and built form standards in:</p> <p>ia. <u>Rule 15.4A Metropolitan Centre Zone;</u></p>

Schedule 1: Detailed submissions and relief sought

Relief sought by the submitter is shown in ~~strike through~~ and underline

	Provision	Submission	Relief Sought
			i. ...
37.	New provisions Metropolitan Centre Rules	<p>Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”.</p> <p>The proposed rules for the Metropolitan Centre Zone are appended to this submission as Schedule 2.</p> <p>In preparing the rules for the Metropolitan Centre Zone:</p> <ul style="list-style-type: none"> • A full range of activities is provided for to reflect its role as servicing a sub-regional catchment. • The rules and activity specific standards are consistent with the approach taken for the City Centre Zone and Town Centre Zone. • To maintain the “primacy” of the City Centre Zone, a maximum permitted height of 45m is proposed, being half the permitted height of the City Centre Zone, and the same height as the City Centre Cathedral Square and Victoria Street Height Precincts. This additional height is required to encourage additional employment and residential options in the area, and the increased built form will increase foot traffic in the area, encouraging further retail activity and employment. 	Insert the rules for the “Metropolitan Centre Zone” as per Schedule 2 of this submission.

Schedule 2

Schedule 2: Metropolitan Centre Zone Rules

15.4A Rules – Metropolitan Centre Zone

15.4A.1 Activity status tables – Metropolitan Centre Zone

15.4A.1.1 Permitted activities

- a. The activities listed below are permitted activities in the Metropolitan Centre Zone if they meet the activity specific standards set out in this table and the built form standards in Rule 15.4A.2. Note, the built form standards do not apply to an activity that does not involve any development.
- b. Activities may also be controlled, restricted discretionary, discretionary, non-complying or prohibited as specified in Rules 15.4A.1.2, 15.4A.1.3, 15.4A.1.4, 15.4A.1.5 and 15.4A.1.6.
- c. The activities listed below include any associated landscaping, access, parking areas, loading, waste management areas and other hardstanding areas.

Activity		Activity specific standards
P1	Any new building or addition to a building, for any permitted activity listed in Rule 15.4A.1.1 P2 to P17.	Nil
P2	Retail activity	Nil
P3	Commercial services	Nil
P4	Entertainment activity	Nil
P5	Recreation activity	a. For sites shown on the planning maps as being within active frontage areas, these activities shall not be located at ground level within 10 metres of the boundary of a road (excluding access ways and service lanes), except for pedestrian entranceways, which may be located at ground floor level.
P6	Gymnasium	
P7	Community facility	
P8	Education activity	
P9	Day care facility	
P10	Preschool	
P11	Health care facility	
P12	Spiritual activity	
P13	Office	a. For sites shown on the planning maps as being within active frontage areas, the activity shall not be located at ground floor level within 10 metres of the boundary of a road (excluding access ways and service lanes), except for pedestrian entranceways or reception areas, which may be located at ground floor level. b. Each residential unit shall be provided with an outdoor service space contained within the net site area with a minimum area of 5m ² and each dimension being a minimum of 1.5 metres, except that:
P14	Residential activity	

Schedule 2: Metropolitan Centre Zone Rules

Activity		Activity specific standards
		<ul style="list-style-type: none"> i. an indoor area or areas with a minimum volume of 3m³ may be provided in lieu of any outdoor service space; or ii. if a communal outdoor service space with a minimum area of 10m² is provided within the site, the outdoor service space may reduce to 3m² for each residential unit. <p>c. The minimum net floor area for any residential unit (including toilets and bathrooms but excluding car parking area, garages, or balconies allocated to each unit) shall be:</p> <ul style="list-style-type: none"> i. studio 35m²; ii. 1 bedroom 45m²; iii. 2 bedrooms 60m²; and iv. 3 or more bedrooms 90m². <p>d. Each residential unit without a habitable space on the ground floor shall have 10m² of outdoor living space provided that:</p> <ul style="list-style-type: none"> i. a minimum of 58m² of the area, with each dimension being a minimum of 1.58 metres, shall be provided as a private balcony located immediately outside, and accessible from an internal living area of the residential unit; and ii. the balance of the required 10m² not provided by private balconies can be provided in a communal area, with each dimension being a minimum of 4 metres, that is available for the use of all site residents. <p>Advice note:</p> <ul style="list-style-type: none"> e. Balconies can be recessed, cantilevered or semi-recessed. f. Each residential unit with a habitable space on the ground floor shall have 10m² of outdoor living space immediately outside and accessible from an internal living area of the residential unit, with a minimum dimension of 4m. g. Any outdoor service space or outdoor living space shall not be used as a car parking area or access. h. Each residential unit shall have an outlook space from habitable room windows, oriented over land within the development site or a street or public space, with:

Schedule 2: Metropolitan Centre Zone Rules

Activity		Activity specific standards
		<ul style="list-style-type: none"> i. a minimum dimension 4m in depth and 4m in width for a living room ii. a minimum dimension 3m in depth and 3m in width for a bedroom. i. The outlook space shall not extend over an outlook space or outdoor living space required by another residential unit.
P15	Visitor accommodation	a. The activity shall not be located at ground floor level within 10 metres of the boundary of a road (excluding access ways and service lanes), except for pedestrian entranceways or reception areas, which may be located at ground floor level.
P16	Art studios and workshops	Nil
P17	Retirement village	Nil

15.4A.1.2 Controlled activities

- a. The activities listed below are controlled activities.
- b. Discretion to impose conditions is restricted to the matters over which control is reserved, as set out in Rule 15.14A.2.1 b.

	Activity
C1	<ul style="list-style-type: none"> a. Any activity listed in Rule 15.4A.1.1 P1-P17 requiring consent under Rule 15.4A.2.1(b). b. Any application arising from this rule shall not be limited or publicly notified

15.4A.1.3 Restricted discretionary activities

- a. The activities listed below are restricted discretionary activities.
- b. Discretion to grant or decline consent and impose conditions is restricted to the matters of discretion set out in Rule 15.14, as set out in the following table.

	Activity	The Council's discretion shall be limited to the following matters:
RD1	<ul style="list-style-type: none"> a. Any activity listed in Rule 15.4A.1.1P14 that does not meet one or more of the activity specific standards a.- i. b. Any application arising from this rule shall not be limited or publicly notified other than for any breach of standards (h) and (i), which must not be publicly notified. 	<ul style="list-style-type: none"> a. Residential activity – Rule 15.14.2.3 b. Activity at ground floor level – Rule 15.14.2.2 c. Glazing – Rule 15.14.3.37 d. Outlook spaces – Rule 15.14.38
RD2	Any activity listed in Rule 15.4A.1.1 P1-P17 and Rule 15.4A.1.3 RD3 to	a. As relevant to the built form standard that is not met:

Schedule 2: Metropolitan Centre Zone Rules

	<p>RD6, that do not meet one or more of the built form standards in Rule 15.4A.2.1 c. and Rules 15.4A.2.2 – 15.4A.2.16, unless otherwise specified.</p> <p>Advice note:</p> <ol style="list-style-type: none"> 1. Refer to relevant built form standard for provisions regarding notification. 	<ol style="list-style-type: none"> i. Urban design – Rule 15.14.1 ii. Maximum building height – Rule 15.14.3.1 iii. Minimum separation from the internal boundary with a residential or open space zone – Rule 15.14.3.3 iv. Sunlight and outlook at boundary with a residential zone – Rule 15.14.3.4 v. Water supply for fire fighting – Rule 15.14.3.8 vi. Minimum building setback from the railway corridor – Rule 15.14.3.10 vii. Building setback and continuity – Rule 15.14.3.15 viii. Sunlight and outlook for the street – Rule 15.14.3.17 ix. Minimum number of floors – Rule 15.14.3.18 x. Flexibility in building design for future uses – Rule 15.14.3.19 xi. Location of on-site car parking – Rule 15.14.3.20 xii. Screening of outdoor storage and service areas/spaces – Rule 15.14.3.22 xiii. Minimum separation from the boundary with a residential zone – Rule 15.14.3.24 xiv. Upper floor setbacks, tower dimension and site coverage – Rule 15.14.3.35 xv. Wind – 15.14.3.39
RD3	<ol style="list-style-type: none"> a. Service station b. Any application arising from this rule shall not be limited or publicly notified. 	<ol style="list-style-type: none"> a. Centre vitality and amenity – Rule 15.14.2.4
RD4	<ol style="list-style-type: none"> a. Any activity listed in Rule 15.4A.1.1P5-P13 that do not meet the activity specific standards. b. Any application arising from this rule shall not be limited or publicly notified. 	<ol style="list-style-type: none"> a. Centre vitality and amenity – Rule 15.14.2.4
RD5	<ol style="list-style-type: none"> a. Parking building b. Any application arising from this rule shall not be limited or publicly notified. 	<ol style="list-style-type: none"> a. Urban design – Rule 15.14.1

Schedule 2: Metropolitan Centre Zone Rules

15.4A.1.4 Discretionary activities

- a. The activities listed below are discretionary activities.

	Activity
D1	Any activity not provided for as a permitted, controlled, restricted discretionary, non-complying or prohibited activity.

15.14A.1.5 Non-complying activities

- a. The activities listed below are non-complying activities.

	Activity
NC1	Sensitive activities within the 50 dB Ldn Air Noise Contour as defined on the planning maps.
NC2	<p>a. Sensitive activities</p> <ul style="list-style-type: none"> i. within 12 metres of the centre line of a 220kV National Grid transmission line or within 12 metres of a foundation of an associated support structure. ii. within 10 metres of the centre line of a 66kV electricity distribution line or within 10 metres of a foundation of an associated support structure. <p>b. Buildings on greenfield sites within 10 metres of the centre line of a 66kV electricity distribution line or within 10 metres of a foundation of an associated support structure.</p> <p>c. Buildings, other than those in (b) above,</p> <ul style="list-style-type: none"> i. within 12 metres of the foundation of a 220kV National Grid transmission support structure. ii. within 10 metres of the foundation of an associated support structure. <p>d. Fences within 5 metres of a National Grid transmission line support structure foundation or a 66kV electricity distribution line support structure foundation.</p> <p>e. Any application arising from rules (a)(ii), (b), (c)(ii) and (d) with regard to a 66kV electricity distribution line above shall not be publicly notified, and shall be limited notified only to Orion New Zealand Limited or other electricity distribution network operator (absent its written approval).</p> <p>Advice notes:</p> <ul style="list-style-type: none"> 1. The National Grid transmission lines and 66kV electricity distribution lines are shown on the planning maps. 2. Vegetation to be planted around the electricity distribution lines should be selected and/or managed to ensure that it will not result in that vegetation breaching the Electricity (Hazards from Trees) Regulations 2003. 3. The New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001) contains restrictions on the location of structures and activities in relation to National Grid transmission lines and electricity distribution line. Buildings and activities in the vicinity of National Grid transmission lines or electricity distribution lines must comply with the NZECP 34:2001.

Schedule 2: Metropolitan Centre Zone Rules

	4. Notice of any application made in relation to rules (a)(i), (c)(i) and (d) with regard to National Grid transmission lines shall be served on Transpower New Zealand in accordance with Clause 10(2) of the Resource Management (Forms, Fees, and Procedure) Regulations 2003.
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15.4A.1.6 Prohibited activities

There are no prohibited activities.

15.4A.2 Built form standards – Metropolitan Centre Zone

Advice note: There is no spare, or limited, wastewater, storm water, or water supply infrastructure capacity in some areas of Christchurch City which may create difficulties in granting a building consent for some developments. Alternative means of providing for those services may be limited or not available. Compliance with the District Plan does not guarantee that connection to the Council's reticulated infrastructure is available or will be approved. Connection to the Council's reticulated infrastructure requires separate formal approval from the Council. There is a possibility that approval to connect will be declined, or development may trigger the need for infrastructure upgrades or alternative servicing at the developer's cost. Anyone considering development should, at an early stage, seek information on infrastructure capacity from Council's Three Waters Unit. Please contact the Council's Three Waters Unit at WastewaterCapacity@ccc.govt.nz, WaterCapacity@ccc.govt.nz and Stormwater.Approvals@ccc.govt.nz.

- a. The following built form standards shall be met by all permitted activities and restricted discretionary activities RD1 – RD6, unless otherwise stated.

15.4A.2.1 Urban design

	Activity Status	Applicable to	Matters of control or discretion
a.	Permitted activity	Any new building or addition to a building for activities listed in Rule 15.4A.1.1 P1 to P17 22m or less in height	Nil
b.	Controlled activity	Any new building or addition to a building for activities listed in Rule 15.4A.1.1 P1 to P17 that exceed permitted standard 15.4A.2.1.a. but is less than 45m in height and is certified by a qualified urban design expert on a Council approved list as meeting each of the urban design provisions/ outcomes in Rule 15.4A.1 Urban design (a)(i)-(ix). Certification shall include sufficient detail to demonstrate how the relevant urban design	a. That the new building or addition to a building is built in accordance with the urban design certification.

Schedule 2: Metropolitan Centre Zone Rules

		provisions / outcomes in Rule 15.4A.1 have been met.	
c.	Restricted discretionary	Any new building or addition to a building that is not a permitted or controlled activity under Rule 15.4A.2.1 a or b.	a. Urban design – Rule 15.14.1
d.	Any application arising from this rule shall not be limited or publicly notified.		

Advice note:

1. Any building or an addition to a building requiring resource consent under Rule 15.4A.2.1 is exempt from meeting Rule 15.4A.2.3.
2. The following forms of development are exempt from compliance with this rule:
 - a. Repairs, maintenance, and seismic, fire and/or access building code upgrades; or
 - b. Refurbishment, reinstatement works.
3. The following activities in Rule 15.4A.1.1 are exempt from compliance with this rule:
 - a. P7 Community facility; P8 Education activity; P10 Preschool; P11 Health care facility; P12 Spiritual activity.

15.4A.2.3 Building setback and continuity

- a. Buildings (excluding fences for the purposes of this standard) shall be built:
 - i. up to a road boundary, except that where the allotment fronts more than one road boundary, buildings shall be built up to all road boundaries of the allotment; and
 - ii. across a minimum of 65% of the width of an allotment where it abuts all road boundaries (excluding access ways and service lanes).
- b. Any application arising from this rule shall not be limited or publicly notified.

Advice note:

1. This rule applies to the ground and first floor of buildings only.

15.4A.2.4 Sunlight and outlook for the street

- a. Buildings shall not project beyond a 45 degree recession plane measured from the maximum road wall height and angling into the site:
 - i. up to a maximum height of 22m; or
 - ii. for sites located on a street intersection, this rule shall not apply within 30m of the street corner.
- b. Any application arising from this rule shall not be limited or publicly notified.

15.4A.2.5 Minimum numbers of floors

- a. The minimum number of floors above ground level for any building shall be two.
- b. Any application arising from this rule shall not be limited or publicly notified.

15.4A.2.6 Flexibility in building design for future uses

- a. The minimum distance between the top of the ground floor surface and the bottom of the first floor slab shall be 3.5 metres. The measurement shall be made from the ground floor surface to the bottom of the floor slab above.

Schedule 2: Metropolitan Centre Zone Rules

- b. This rule shall not apply to buildings for residential activity or a retirement village except where they are within 10 metres of a road boundary.
- c. Any application arising from this rule shall not be limited or publicly notified.

15.4A.2.7 Location of onsite parking areas

- a. Parking areas shall be located to the rear of, on top of, within or under buildings; or when located on the ground floor of any building, not located within 10 metres of the road boundary.
- b. Any application arising from this rule shall not be limited or publicly notified.

15.4A.2.8 Screening of outdoor storage and service areas or spaces

- a. Any outdoor storage area or outdoor service spaces shall be:
 - i. located to the rear of the principal building on the site; and
 - ii. screened from any adjoining site by landscaping, fence, wall or a combination of these of not less than 1.8 metres high.
- b. Any application arising from this rule shall not be limited or publicly notified.

15.4A.2.9 Sunlight and outlook at boundary with a residential zone

- a. Where an internal boundary adjoins a residential zone, no part of any building shall project beyond a building envelope constructed by recession planes shown in Appendix 14.16.2 Diagram D from points 3m above ground level along all boundaries.
- b. For any part of a building above 12m in height, the recession plane under a. shall apply, unless that part of the building above 12m in height is set back from the relevant boundary as set out below:
 - i. northern boundary: 6 metres;
 - ii. southern boundary: 8 metres; and
 - iii. eastern and western boundaries: 7 metres

Where the boundary orientation is as identified in Appendix 14.15.2 Diagram D, in which case there shall be no recession plane requirement for that part of the building above 12m in height.
- c. Any application arising from this rule shall not be limited or publicly notified.

Advice note:

- 1. There is no recession plan requirement for sites located in the Metropolitan Centre Zone that adjoin sites also zoned Metropolitan Centre Zone.

15.14A.2.10 Minimum setback from the boundary with a residential zone or from an internal boundary

- a. The minimum setback from the boundary with a residential zone, or in the case of residential activities from an internal boundary, shall be as follows:
 - i. Buildings shall be setback from the boundary of any residential zone by a minimum of 3 metres, except that where there is a shared wall with a building within a residential zone no setback is required.
 - ii. For residential activities there shall be no minimum building setback from internal boundaries other than from the boundary of any residential zone, except where a

Schedule 2: Metropolitan Centre Zone Rules

balcony or the window of any habitable space faces an internal boundary and there is no other direct daylight available to that habitable space, then the balcony or window shall not be located within 3 metres of any internal boundary.

- iii. Any required building under i. shall contain landscaping for its full width and length and this area planted in a combination of shrubs, trees and grasses including a minimum of 1 tree for every 10 metres of boundary length capable of reaching a minimum height at maturity of 8 metres and shall not be less than 1.5 metres at the time of planting.
- iv. All landscaping within the setback shall be maintained, and if dead, diseased or damaged, shall be replaced.
- b. Any application arising from this rule shall not be limited or publicly notified.

15.14A.2.11 Building height

- a. The maximum and minimum height of any building shall be as follows:
 - i. The maximum height shall be 45 metres.
 - ii. The maximum height of the building base shall be 22 metres.

15.14A.2.12 Water supply for fire fighting

- a. Provision for sufficient water supply and access to water supplies for firefighting shall be made available to all buildings (excluding accessory buildings that are not habitable buildings) via Council's urban reticulated system in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice (SNZ PAS: 4509:2008).
- b. Where a reticulated water supply compliant with SNZ PAS:4509:2008 is not available, water supply and access to water supplies for fire fighting that is in compliance with the alternative firefighting water sources provisions of SNZ PAS 4509:2008 must be provided.
- c. Any application arising from this rule shall not be publicly notified. Limited notification, if required, shall only be to the New Zealand Fire Service Commission (absent its written approval).

15.14A.2.13 Building tower setbacks

- a. All parts of the building tower shall be set back from any boundary by a distance equal to 10% of the total height of the building.

15.14A.2.14 Maximum building tower dimension and building tower coverage

- a. The maximum horizontal dimension of any part of the building tower shall be 40m.

15.14A.2.15 Minimum building tower separation

- a. All parts of the building tower shall be separated from any other building tower by at least 12 metres. This rule applies to buildings on the same site, and to separate parts of the same building that may project above 22m in height.

Schedule 2: Metropolitan Centre Zone Rules**15.14A.2.16 Wind**

- a. New buildings, structures or additions above 30 metres in height shall not result in wind conditions that exceed the following cumulative wind condition standards (Gust Equivalent Mean) more than 5% annually at ground level, within 100m of the site based on modelling:
 - i. 4 m/s at the boundary of the site street frontage for the width of the footpath;
 - ii. 6 m/s within any carriageway adjacent to the site;
 - iii. 4 m/s at public open spaces:
- b. New buildings, structures or additions greater than 30 metres in height shall not result in wind speeds exceeding 15m/s more than 0.3% annually at ground level.

15.14A.2.17 Minimum building setback from railway corridor

- a. For sites adjacent to or abutting the railway line, the minimum building setback for buildings, balconies and decks from the rail corridor boundary shall be 4 metres.
- b. Any application arising from this rule shall not be publicly notified.

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Bruce Neill

Last name:

Alexander

Preferred method of contact

Email

Attached Documents

Name
Bruce Alexander submission chch heritage plan 13

Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

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

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

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

** Required information*

Name* Bruce Neill Alexander
Address* 111 Hackthorne Rd, Cashmere Postcode* 8022
Email brucealexandernz@gmail.com Phone no. 03-942 3277

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

Organisation's name _____
Your role _____

Trade competition and adverse effects* (select appropriate)

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

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

(a) adversely affects the environment, and

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

Yes ☐ No ☒

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

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

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

☐ I wish to speak in support of my submission on Plan Change 14

☒ I do not wish to speak.

Joint submissions (Please tick this box if you agree)

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

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

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

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

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

Signature Bruce Alexander Date 12 May 2023 ✓

Have your say

Heritage Plan Change 13

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

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

Chapter 9 - Natural and Cultural Heritage

I would like to have 111 Hackthorne Road for inclusion in the heritage schedule due to its age and history

My submission is that:*

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

I would like to have my house included in the heritage schedule for the following reasons:

It was built in 1910 as a weekend holiday cottage, this was the first house built on Hackthorne Road. It is made of kauri weatherboard and heart rimu construction.

It has only had two owners in that time. I have been living here for 52 years since i bought it in 1970

It survived the 2011 earthquake without minimal (\$60,000) damage, mainly plaster

Extensive alterations have been made over the years.

I seek the following decision from the Council:*

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

Please include 111 Hackthorne Road in the heritage schedule according to Chapter 9 Natural and Cultural Heritage

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details



Submission Date: 12/05/2023

First name: Fiona **Last name:** McCarthy

Organisation:
Ministry of Housing and Urban Development

Preferred method of contact Email

Attached Documents

Name	
Ministry of Housing and Urban Development	
HUD CCC PC 14 submission	

Mulder, Andrea

From: RMA Plans <RMAPlans@hud.govt.nz>
Sent: Friday, 12 May 2023 4:10 pm
To: Engagement
Cc: RMA Plans
Subject: PC 14 submission - Ministry of Housing and Urban Development
Attachments: HUD CCC PC 14 submission .docx; HUD CCC PC 14 submission .pdf

Kia ora,

Please find attached a submission on Plan Change 14 from Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (HUD).

The submission is in the name of our CEO, but please use this email address and my contact information for correspondence.

Ngā mihi
Fiona

Fiona McCarthy ([she/her](#))

Manager Urban Development Enablement | Policy and Legislation Design
Solutions Design and Implementation

Fiona.McCarthy@hud.govt.nz | Phone: +64 4 832 2594 | Mobile: +64 22 079 4140
www.hud.govt.nz | Level 8, 7 Waterloo Quay, Pipitea, Wellington



He kāinga ora, he hāpori ora - our purpose is thriving communities where everyone has a place to call home.

[UNCLASSIFIED]

Disclaimer

This email is confidential and solely for the use of the intended recipient. If you have received this email in error, then any use is strictly prohibited. Please notify us immediately and delete all copies of this email and any attachments. Any opinions expressed in this message are not necessarily those of the Ministry of Housing and Urban Development.



**Submission on a notified proposal for Plan Change 14 to the Christchurch District Plan
under Clause 6 of Schedule 1 Resource Management Act 1991**

12 May 2023

engagement@ccc.govt.nz

Name of submitter: Andrew Crisp, Chief Executive, Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (HUD)

This is a submission on Plan Change 14.

HUD could not gain an advantage in trade competition through this submission.

HUD's role and responsibilities

HUD leads the New Zealand Government's housing and urban development work programme. We are responsible for strategy, policy, funding, monitoring and regulation of New Zealand's housing and urban development system. We are working to:

- address homelessness
- increase public and private housing supply
- modernise rental laws and rental standards
- increase access to affordable housing, for people to rent and buy
- support quality urban development and thriving communities.

We work closely with other central and local government agencies, the housing sector, communities, and iwi to deliver on our purpose – thriving communities where everyone has a place to call home – he kāinga ora, he hāpori ora.

Wider Context

The Government Policy Statement on Housing and Urban Development 2021 (GPS-HUD)

The GPS-HUD sets a direction for housing and urban development in New Zealand. Its overarching vision is that everyone in New Zealand lives in a home and a community that meets their needs and aspirations.

The four main things it sets out to achieve are:

- **Thriving and resilient communities** – the places where people live are accessible and connected to employment, education, social and cultural opportunities. They grow and change well within environmental limits, support our culture and heritage and are resilient.
- **Wellbeing through housing** – everyone lives in a home, whether it's rented or owned, that is warm, dry, safe, stable and affordable, with access to the support they need to live healthy, successful lives.
- **Māori housing through partnership** – Māori and the Crown work together in partnership so all whānau have safe, healthy, affordable and stable homes. Māori housing solutions are led by Māori and are delivered locally. Māori can use their own assets and whenua Māori to invest in and support housing solutions.



- **An adaptive and responsive system** – Land-use change, infrastructure and housing supply is responsive to demand, well-planned and well-regulated.

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

HUD has a particular interest in this Plan Change stemming from its co-lead role in developing the NPS-UD and medium density residential standards, and overseeing their implementation.

The NPS-UD aims to ensure councils better plan for growth and remove overly restrictive barriers to development to allow growth in locations that have good access to services, public transport networks and infrastructure. The NPS-UD *intensification policies* require councils to enable greater heights and densities in areas that are well-suited to growth, such as in and around urban centres and rapid transit stops.

The NPS-UD provides for qualifying matters – justified reasons to reduce heights and densities enabled.

The NPS-UD is intended to ensure New Zealand's towns and cities are well-functioning urban environments that support housing supply and affordability, accessibility to jobs and services, and emissions reduction.

The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Amendment Act)

The Amendment Act was passed in December 2021 with the purpose of increasing housing supply by accelerating the implementation of the NPS-UD and enabling more medium density homes through the Medium Density Residential Standards (MDRS).

The MDRS aims to enable housing choice across Aotearoa New Zealand's main urban areas. The standards mean that up to three dwellings of up to three storeys can be developed on a site without the owner needing to apply for a resource consent, as long as all other rules and standards have been met.

The MDRS also aims to increase urban agglomeration benefits, allow for the more efficient use of existing infrastructure, and reduce urban sprawl. This then prevents the loss of the natural landscape, the expensive expansion of infrastructure networks, and compounding congestion from the car-dependent lifestyles that accompany that expansion.

While the NPS-UD is targeted in where it applies, the MDRS apply to every relevant residential zone in a Tier 1 urban environment, except where a qualifying matters applies.

The benefits of intensification

In recent years, HUD and the Ministry for the Environment (MfE) have commissioned a series of work to develop an evidence base to inform policy development and to support the evaluation of policies. This evidence base has been bolstered by international evidence that has considered the impacts of intensification. Reports commissioned by HUD and MfE include (but are not limited to) the following:

- The costs and benefits of urban development, 2019, MRCagney: <https://environment.govt.nz/publications/the-costs-and-benefits-of-urban-development/>
- The cost benefit analysis for the National Policy Statement on Urban Development, 2019: <https://environment.govt.nz/assets/Publications/Files/NPS-UD-CBA-final.pdf>



- The cost benefit analysis for the Medium Density Residential Standards: <https://environment.govt.nz/assets/publications/Cost-benefit-analysis-of-proposed-MDRS-Jan-22.pdf>

As a whole, this evidence base clearly shows the benefits of intensification in the form of:

- **Social benefits**, resulting from greater availability of a wide range of housing typologies in areas that are close to jobs and services. This can slow or reverse the transfer of wealth from future homeowners and renters to current property owners in areas with heavy restrictions.
- **Economic benefits**, resulting from greater productivity. *Agglomeration economies* drive productivity growth in areas where higher numbers of firms and people are located near one another, as a result of improved matching between employers and employees and higher levels of innovation (due to 'knowledge spillovers').
- **More efficient use of infrastructure**, as infrastructure costs are lower, on average, for medium density developments and developments in inner-city areas.
- **Environmental benefits** relative to greenfields development and to development further from the centre of cities. In particular, intensification is a key mechanism for reducing carbon emissions, enabling shorter commute times and efficient use of infrastructure, while continuing to meet housing and urban development needs.

This evidence shows that the benefits outlined above tend to outweigh costs and do so substantially in areas that are well-suited to development. Benefits are also widespread, longstanding and projected to grow substantially over time. Costs are real (congestion, sunlight loss, loss of views) but tend to be smaller and more narrowly focused, primarily affecting current homeowners.

As a result, modelling for both the NPS-UD intensification policies and the MDRS showed a clear net benefit. This work also highlighted that the costs of any restrictions imposed will be a reduction, to a greater or lesser extent, in the positive impacts outlined above. Benefits and costs are also shown to arise commensurately in response to development, with neither arising if development does not occur. Critically, this means that there is not a development scenario where costs outweigh benefits.

This evidence base has been well socialised with councils through written communication, workshops and the legislative process.

In its role overseeing the implementation of the NPS-UD, HUD is focused on ensuring these benefits are realised, that restrictions are only put in place where there are genuine qualifying matters that need to be managed, and that any proposed qualifying matters are supported by the level of cost benefit analysis required by the RMA.

Scope of Submission

The submission is focused on the application of qualifying matters and policy 3(d) of the NPS-UD.



The requirements for qualifying matters

The origins of the NPS-UD

The NPS-UD and the Amendment Act have their origins in the Productivity Commission's 2015 report, *Using land for housing* (Report). Among the Report's findings were that planning frameworks were overly restrictive on density, and that density controls were too blunt, having a negative impact on development capacity, affordability, and innovation. The Report also commented that planning rules and provisions lacked adequate underpinning analysis, resulting in unnecessary regulatory costs for housing development.

As a response to that issue, successive Governments have enacted national policy statements to direct district councils to enable greater development capacity within our urban areas, to address the challenges identified above by the Productivity Commission.

Key requirements of the NPS-UD

Policy 3 of the NPS-UD is directive. It requires district councils to enable building heights and density of urban form:

- (a) as much as possible in city centre zones, to maximise the benefits of intensification;
- (b) in metropolitan centre zones, of at least six storeys and otherwise reflecting demand;
- (c) of at least six storeys within a walkable catchment of:
 - (i) rapid transit stops; and
 - (ii) the edge of city and metropolitan centre zones; and
- (d) 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 6 of the NPS-UD illustrates the mindset shift that is required by this new planning paradigm. It relevantly provides that:

Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters

- (a) the planned urban build form anticipated by those RMA planning documents that have given effect to [the NPS-UD];
- (b) that the planned urban built form in those RMA planning documents 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;
- [...]

The requirement to “have particular regard” to the matters in Policy 6 signifies the importance attached to those matters, and the need for them to be carefully considered and weighed in coming to a conclusion when considering submissions. In short, the changes that may result from implementation of the NPS-UD may improve the amenity of those who have (to date) been poorly served by urban planning, at the expense of existing amenity. It is also worth noting that the heights enabled through Policy 3 are just the floor (ie “at least”), and not the ceiling.

Key features of the requirements under the Amendment Act

The requirements introduced through amending the Resource Management Act 1991 (RMA) are similarly directive. The intent of this legislation was to enable increased and varied housing densities, types, and, ultimately, choice.

Section 77G(1) of the RMA requires territorial authorities to incorporate the MDRS in “every relevant residential zone”. Section 77G(2) requires territorial authorities to give effect to the NPS-UD, and in particular, Policy 3, in “every residential zone in an urban environment”.

The sole basis upon which a territorial authority may alter the application of the MDRS, or the building height and density requirements under Policy 3 of the NPS-UD to make them less enabling of development, is by identifying matters which qualify, through evidence and a robust cost-benefit analysis, under ss 77I through 77L. Restrictions can only apply to the extent necessary to accommodate those matters.

The legislation requires one to shift their mindset

In district planning processes prior to the promulgation of the NPS-UD, the starting point was the identification of matters that required protection from inappropriate subdivision, use and development. To properly give effect to the legislation, as outlined above, a new approach is required which sets intensification as the starting point. The baseline of intensification set by the MDRS and NPS-UD can be reduced only to the extent necessary to accommodate the qualifying matters that meet the strict requirements of 77I and 77J.

From HUD’s perspective, it is critical that the mindset of primarily enabling intensification is applied when considering submissions on qualifying matters and policy 3(d), in order to ensure that the legislation is implemented properly.



Relation to Plan Change

Qualifying Matters

We consider that this perspective and requirements must be the starting point when considering submissions on qualifying matters, especially whether restrictions are only being applied to the extent necessary to accommodate those matters.

The Low Public Transport Accessibility Qualifying Matter (LPTAQM)

Against the context above, HUD submits that council's analysis of the LPTAQM is insufficient to meet the legal requirements of 77L. Plan Change 14 proposes to limit the extent of where the MDRS would be enabled to only near the highest-frequency bus routes and routes that connect larger commercial centres through the LPTAQM.

This qualifying matter limits the amount of feasible development capacity in Christchurch by 26,400 additional dwellings. The council's approach does not reflect the required legal approach outlined above, rather seeming to start from a position of excluding application of the MDRS first. Furthermore, using a qualifying matter means applying a static approach to a dynamic issue (the availability of public transport). It is realistic that the supply of public transport is likely to change over the duration of a plan, and also more frequently than plan variations can efficiently keep up with.

HUD submits that the characteristic that Christchurch City Council (CCC) purports makes the level of development provided by the MDRS inappropriate – distance to public transport – is not one which Parliament considered an inappropriate reason for the MDRS to apply. Unlike policy 3 of the NPS-UD which specifically referred to differing levels of intensification being enabled within walkable catchments of certain features (including rapid transit) compared to outside walkable catchments – the requirement to apply the MDRS intentionally did not contain such a link to any form of transport or other service or amenity. This was a deliberate decision as increased density better supports the financial viability of public transport and the uptake of active transport modes, such as cycling and walking.

HUD also submits that the MDRS and NPS-UD are intended to work together to enable development, rather than one restricting the application of the other.

The Sunlight Access Qualifying Matter

HUD questions whether this qualifying matter only modifies the MDRS as little as possible to accommodate the matter the council is attempting to address. HUD notes that the height in relation to boundary rules in Auckland Council's Mixed Housing Urban zone which enabled 3 storeys buildings were considered by Ministers as a possible base for the MDRS, but not followed as they specifically did not enable a full width third storey on many sites. A larger envelope provides for a more diverse range of typologies and bulk and location design to be considered in development.



The Airport Noise Contours

HUD submits that the panel should consider whether this qualifying matter makes the MDRS less enabling only to the extent necessary to accommodate the matter. The panel should consider whether alternative treatments may be appropriate instead of density restrictions.

The Key Transport Corridors – City Spine Qualifying Matter

HUD submits that the panel should consider whether this qualifying matter makes the MDRS less enabling only to the extent necessary to accommodate the matter. This qualifying matter creates uncertainty for developers by imposing a restricted discretionary activity status related to undefined future plans, and decreases development capacity and feasibility.

The Riccarton Bush Interface Qualifying Matter

HUD broadly supports the retention and protection of Riccarton Bush on environmental and cultural grounds. HUD notes that, compared to the MDRS, currently only the height limits have been reduced to manage the interface between Riccarton Bush and the surrounding houses. HUD would encourage careful consideration of any further reductions if other submissions suggest any, especially in light of Policy 6 of the NPS-UD.

Policy 3(d) – increased heights and densities

Policy 3(d) of the NPS-US (written in full above) aims to maximise the benefits of intensification, including agglomeration benefits. HUD submits that CCC should go further in enabling density around existing commercial centres to maximise these benefits, by increasing the spatial extent of the following types of commercial centres by at least 200 metres:

- a. medium local centres;
- b. large local centres;
- c. town centres;
- d. large town centres.

This would also improve consistency in CCC's concept of walkability. In developing their LPTAQM, CCC used a 10 minute walk as a metric to consider what was and wasn't accessible to public transport. However, even around the largest commercial centres in Christchurch the High Density Residential Zone only extends approximately 600m (an 8 minute walk). This implies that CCC assumes people would walk further to a bus, than to a centre zone. Furthermore, the higher density zoning around the city centre, as required by policy 3(c), extends for 1.2 km, yet the next largest catchment of high density extends for only 600m. Increasing the size of the walkable catchments will maximise agglomeration benefits, and provide internal consistency within the Plan.



Relief sought by HUD

HUD seeks the following changes to ensure that Plan Change 14 maximises this opportunity to address the current housing shortages in Christchurch including by:

1. That the following qualifying matters are deleted and the appropriate underlying zoning is applied:
 - a. Low Public Transport Accessibility Qualifying Matter.
 - b. Sunlight Access
 - c. Airport Noise Contours
 - d. Key Transport Corridors – City Spine
2. That the Panel considers whether the Riccarton Bush Interface Qualifying Matter applies restrictions only to the extent necessary to accommodate the matter.
3. Increase the walkable catchments, and therefore the associated heights and densities, of the following types of commercial centres by at least 200 metres:
 - a. medium local centres.
 - b. large local centres.
 - c. town centres.
 - d. large town centres.
4. Including such further or other relief, or other consequential or other amendments, as are considered appropriate and necessary to address the concerns set out herein.

Hearings

HUD wishes to be heard in support of its submission. If others make a similar submission, HUD will consider presenting a joint case with them at a hearing.

aAndrew Crisp, Chief Executive, Te Tūāpapa Kura Kāinga - Ministry of Housing and Urban Development

Address for Service of person making submission:
Te Tūāpapa Kura Kāinga Ministry of Housing and Urban Development
Contact Person:
Email: RMAPPlans@hud.govt.nz
Phone: Fiona McCarthy, 022 079 4140
Postal Address: Ministry of Housing and Urban Development

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Sally & Declan


Last name:

Bransfield

Preferred method of contact

Email

Attached Documents

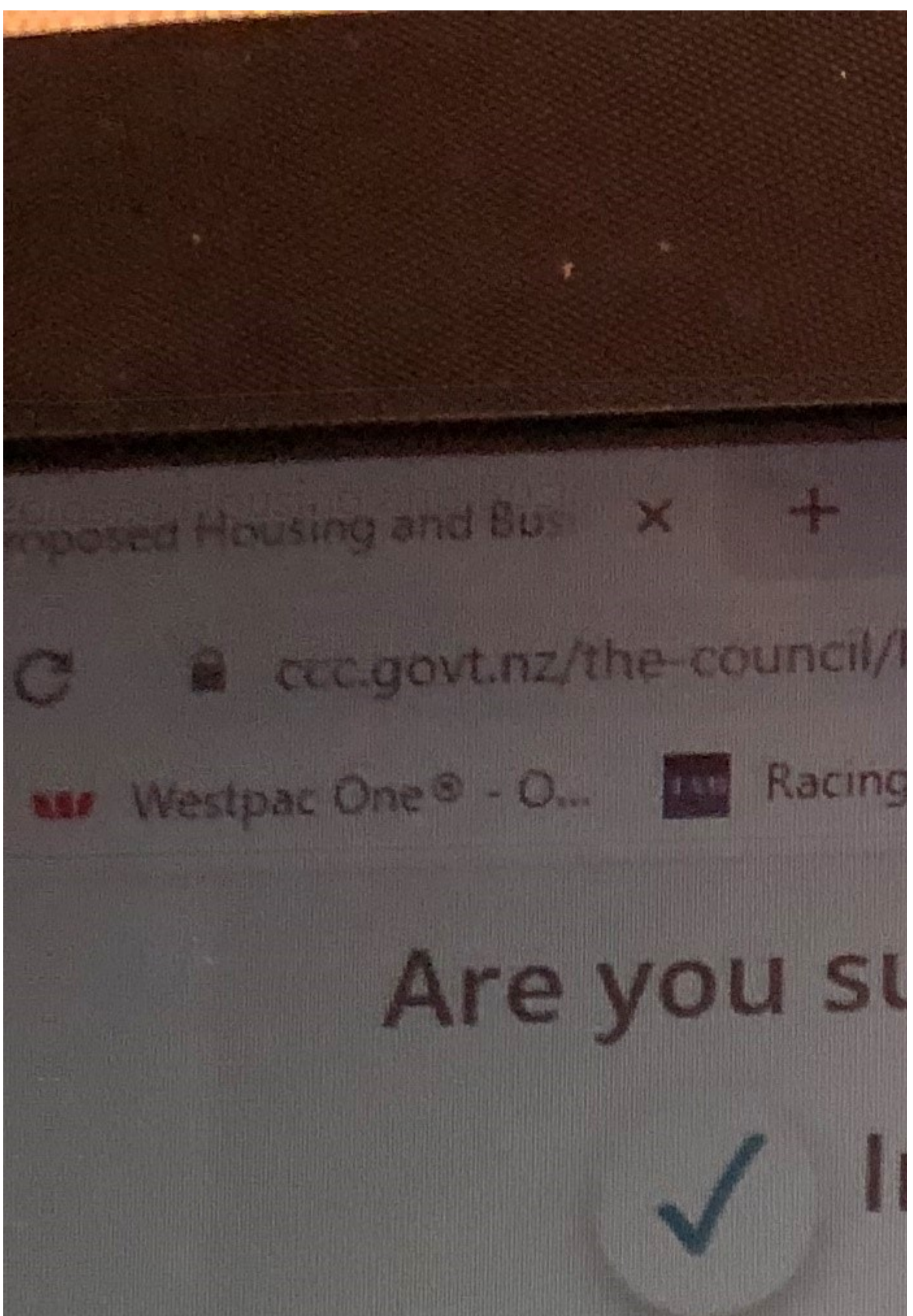
Name	
Sally	

Robson, Gina

From: s b <sbransfield@hotmail.com>
Sent: Friday, 12 May 2023 4:49 pm
To: Engagement
Subject: PC14

Please find attached photos. Have been advised to send to this address by CCC staff
As unable to successfully submit after many attempts.
Thankyou

Sally Bransfield



Proposed Housing and Bus

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ccc.govt.nz/the-council/hav



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Buy online and sell...



Log

Section I



Sent from my iPhone

Jackson, Andrew

From: declan bransfield <dbransfield1@hotmail.com>
Sent: Friday, 12 May 2023 4:23 pm
To: Engagement
Subject: Have your say
Attachments: CCC.docx

Regards
Declan
Declan Bransfield Builders Ltd
0274554992
Sent from [Mail](#) for Windows 10

Declan Bransfield

8 Rimu St

Riccarton 8041

02745549982

Unable to make submission on line

Comntacted CC and advised by Rita to send submission to this address 1605pm 12/5/23

Maintain residential zone on Deans Bush Interface

all else to High Density ,Proximity to schools shops public transport routes hospitals etc

Hagley Park not affected by high rise developments

All other areas around Deans Bush to be high Density

You are creating an island in an area that should be a thriving area

I suspect that CCC is being swayed by a small group of NIMBY citizens who do not have Riccartons best intentions at heart and are instead hindering growth by preserving their little enclave

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details


Submission Date: 12/05/2023

First name: Julie

Last name: Robertson-Steel

Preferred method of contact Email

Attached Documents

Name	
Julie Robertson-Steel1	

Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

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

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

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

* Required information

Name* JULIE ROBERTSON - STEEL

Address* 2/14 BISHOP STREET, CHRISTCHURCH Postcode* 8014

Email robertsonsteel@yahoo.co.nz Phone no. 021 115 7322

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

Organisation's name N/A

Your role N/A

Trade competition and adverse effects* (select appropriate)

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

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

(a) adversely affects the environment, and

(b) does not relate to the trade competition or the effects of trade competition? N/A ☐ Yes ☐ No

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

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

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

☐ I wish to speak in support of my submission on Plan Change 14

☒ I do not wish to speak.

Joint submissions (Please tick this box if you agree)

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

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

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

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

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

Signature [Signature] Date 25/4/2023

Have your say

Housing and Business Choice Plan Change 14

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

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

1. Designated areas for High and Medium Density Residential Zones within St. Albans, north of the city centre.
2. Rules relating to greater sunlight access for homes.

My submission is that:*

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

See submission attached.

I seek the following decision from the Council:*

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

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

1. Re-designation of the St. Albans residential area north of Bealey Avenue and south of Edgeware Road as a Medium Density Residential Zone.
2. Adjustment of the proposed recession planes on new buildings to allow for sunlight to directly reach the ground floors of existing, adjoining dwellings for at least some portion of every day of the year.

Submission on Housing and Business Choice Plan Change (Plan Change 14)

My submission is that:

I appreciate the Council's efforts to protect the residents of Christchurch from the application of the new national standards for denser housing, and **support** the Council's proposal for a city-wide Qualifying Matter restriction to protect sunlight access for homes.

In respect of several specific provisions of the proposed changes I submit the following:

1. **The entire St Albans area between Bealey Avenue and Edgeware Road should be designated a Medium Density Residential Zone** for the following reasons:
 - This area is, and has always been, highly residential and has been regenerated since the Christchurch earthquakes as such, with many people buying residential units within the area based on the existing Council rules around intensification, sunlight provisions, etc. It is too late for them not to elect to buy into the area now because it is to become a High Density Zone with the possibility of much taller developments, and this makes it unfair for the District Plan rules to be changed so that the area is High Density at this stage.
 - My point above is evidenced by all the St. Albans residents that I have so far spoken with, making an assumption that any High Density Residential Zone wouldn't extend beyond the Four Avenues and for many, this is one of the bases on which they bought a residential property beyond the Four Avenues.
 - Many of the residential streets between Bealey Avenue and Edgeware Road are narrow and already clogged with residents' cars, as there is insufficient off-street parking. Allowing High Density Residential Zone housing intensification will further exacerbate this problem, as Christchurch is not yet at the stage where people can operate without a car in this area. Within the Four Avenues is somewhat easier, as there are more buses available and people are nearer to the Bus Interchange, but beyond the Four Avenues becomes very problematic.
 - The area within the Four Avenues provides ample opportunity for redevelopment into a High Density Residential Zone and for the foreseeable future is the area that should be concentrated on before the Council looks at extending the Zone out further.
2. The proposed changes in recession planes for **sunlight access** are appreciated but, from my reading of them, may still result in no ground-floor sun for over three months of the year if an adjoining property ends up with a three-storey or higher dwelling to the north of it. I believe that this is unacceptable for the following reasons:
 - Health and wellbeing: Some existing developments have units only on ground level (with separate units above) and for those people, they will be badly affected in terms of health and wellbeing, by having no access to sunlight for that length of time. Depression, in particular, can result in these circumstances and for a city that prides itself on the wellbeing benefits for its citizens of living here, rules allowing such a long period without access to sunlight in dwellings runs contrary to that. In addition, areas of homes with no exposure to sunlight for long periods and in cold temperatures may be prone to damp and mould issues, both inside and out.
 - Allowing developers to build up to 12m without increased setbacks in an area where there are still many single or lower-storey dwellings would block far too much sunlight

even with the new recession planes proposed, and I urge the Council to re-think the recession planes to allow more sunlight to adjoining dwellings.

- Fairness: As stated in (1) above, people have bought into areas based on existing Council rules and to suddenly find that a three-storey (or higher) dwelling can be built to the north of them in a residential area is not equitable or fair to those existing home owners. It is an entirely different situation where a buyer elects to buy in an apartment complex that is already built, or buys a dwelling next door to an existing building that is tall. In this regard, I support developments such as East Frame/One Central within the Four Avenues which are purpose-built as high density, residential complexes that take up larger areas of land – that is a much more appropriate way to develop high density housing.



JULIE ROBERTSON-STEEL

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Lloyd

Last name: Barclay

Preferred method of contact	Email
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Attached Documents

Name
Lloyd Barclay

Save time and do it online

ccc.govt.nz/haveyoursay

Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

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

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

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

* Required information

Name* LLOYD BARCLAY

Address* 24 WATFORD STREET Postcode* 8052

Email lloydandnickybarclay@gmail.com Phone no. _____

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

Organisation's name _____

Your role _____

Trade competition and adverse effects* (select appropriate)

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

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

(a) adversely affects the environment, and

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

☐ Yes ☐ No

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

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

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

☐ I wish to speak in support of my submission on Plan Change 14

☒ I do not wish to speak.

Joint submissions (Please tick this box if you agree)

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

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

☐ Yes, I have attached extra sheets.

☒ No, I have not attached extra sheets.

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

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

Signature [Signature] Date 2.5.2023

Have your say

Housing and Business Choice Plan Change 14

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

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

I AM CONCERNED THAT PROPOSED CHANGES WILL HAVE A SIGNIFICANT IMPACT ON THE CHARACTER AND QUALITY OF OUR NEIGHBOURHOOD. I BELIEVE THERE WILL BE SIGNIFICANT INFRASTRUCTURE ~~PLACE~~ PRESSURES AS A RESULT OF THESE CHANGES AS THEY STAND.

My submission is that:*

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

I DO SUPPORT THE NEED TO INTENSIFY HOUSING IN THE GREATER CITY AREA AS WE SHOULD NOT CONTINUE EXPANDING INTO PRODUCTIVE RURAL AREAS. MY CONCERN IS THE HEIGHT OF DEVELOPMENTS, CHEAP UNATTRACTIVE BUILDINGS AND PROVISION OF SOME FORM OF OFF STREET PARKING. SOME RULING FOR ADDITIONAL GREEN SPACE FOR FAMILIES MUST BE CONSIDERED.

I seek the following decision from the Council:*

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

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

- 1/ DEVELOPMENTS IN RESIDENTIAL AREAS ARE LIMITED TO (3) LEVELS.
- 2/ SOME PROVISIONS FOR OFF STREET PARKING
- 3/ DEVELOPMENTS ARE OF A QUALITY THAT DO NOT DETRACT FROM SURROUNDING NEIGHBOURHOODS
- 4/ GREEN SPACES BE STIPULATED AS PART OF THE CONSENTING PROCESS.

8

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Stuart


Last name:

James Irvine

Preferred method of contact

Email

Attached Documents

Name	
Stuart James Irvine	

Have your say

Housing and Business Choice Plan Change 14

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

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

1. INFRASTRUCTURE

Section 14.2.8.5 Policy - Infrastructure servicing for developments. (c) Ensure that developments are serviced with all required infrastructure in an effective + efficient manner

Section 14.2.8.6 - Integration + connectivity (c) Avoid significant adverse effects on existing businesses, rural activities or infrastructure.

My submission is that:*

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

Infrastructure pressures in our region of Stowman are already excessive. St Andrew's College has 10,500 pupils + a staff in excess of 500. Car parking + necessary automobile activity is already excessive! The historic + beautiful space that has blessed this community along with it's myriad of water ways is already threatened by increased rainfall affecting stormwater + wastewater levels + potential flooding

I seek the following decision from the Council:*

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

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

The HBRZ (HRZ) proposed for the Stowman area west of Papanui Rd are, without question, inappropriate and must be revised to MRZ at the most. CCC must not allow any increase to the existing dysfunctional + unsafe infrastructure overload in our special community!

Thank you.

Save time and do it online

ccc.govt.nz/haveyoursay

Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

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

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

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

* Required information

Name* STUART JAMES IRVINE

Address* 22a WATFORD ST, CHRISTCHURCH Postcode* 8052

Email stuartirvine4368@gmail.com Phone no. _____

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

Organisation's name N/A.

Your role _____

Trade competition and adverse effects* (select appropriate)

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

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

(a) adversely affects the environment, and

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

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

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

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

Joint submissions (Please tick this box if you agree)

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

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

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

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

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

Signature  Date 5.5.23.

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Douglas


Last name:

Corbett

Preferred method of contact

Postal

Attached Documents

Name	
Douglas Corbett	

Have your say

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

- 5 MAY 2023

Hornby Service Desk

Clause 6 of Schedule 1 Resource Management Act 1991

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

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

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

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

** Required information*

Name* Douglas Corbett
 Address* 17 Elenora Place Hornby Postcode* 8042
 Email dougandkath@extra.co.nz Phone no. 0272567672

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

Organisation's name _____

Your role _____

Trade competition and adverse effects* (select appropriate)

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

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

(a) adversely affects the environment, and

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

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

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

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

Joint submissions (Please tick this box if you agree)

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

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

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

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

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

Signature Douglas Corbett Date 05-05-2023

Have your say

Housing and Business Choice Plan Change 14

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

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

Loss of Sun

Degrading our area

Devaluation of our properties

Increase of Crime and no room to park cars on the street as these proposed units have no garages

Infrastructure can not cope now

My submission is that:*

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

oppose the specific proposed provisions
I wish to have them amended

I seek the following decision from the Council:*

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

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

amendments should only allow not higher than Two storeys high and built in the central City only

Have your say

Heritage Plan Change 13

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

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

Loss of Sun
Loss of privacy
Loss of trees

My submission is that:*

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

Reason for views is we in Hornby have a special Community of mainly single storey buildings which is unique to our Community. We do not want to be a Ghetto. Our Community does not have the infrastructure to cope with all this extra housing, sewer, storm water and traffic. Our roads are congested enough.

I seek the following decision from the Council:*

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

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

amendments PC14 and PC13

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Rogen


Last name:

Lough

Preferred method of contact

Postal

Attached Documents

Name	
RogenLough	

Save time and do it online

ccc.govt.nz/haveyoursay

Housing and Business Choice Plan Change 14

and Heritage Plan Change 14

Clause 6 of Schedule 1 Resource Management Act 1991

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

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

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

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

* Required information

Name* ROGER LOUGH

Address* 2/10 MAYFAIR STREET CHRISTCHURCH Postcode* 8011

Email LOUGH.MAYFAIR.CMCH@XTRA.CO.NZ Phone no. 0272 481488

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

Organisation's name _____

Your role _____

Trade competition and adverse effects* (select appropriate)

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

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

(a) adversely affects the environment, and

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

☐ Yes ☐ No

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

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

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

☐ I wish to speak in support of my submission on Plan Change 14

☐ I do not wish to speak.

Joint submissions (Please tick this box if you agree)

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

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

☐ Yes, I have attached extra sheets.

☒ No, I have not attached extra sheets.

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

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

Signature [Signature]

Date 25/4/23

Housing and Business Choice Plan Change 14

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

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

RESIDENTIAL INTENSIFICATION RULE CHANGES.

My submission is that:*

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

WHILE WE SUPPORT THE DRANS AVENUE PARCINET SOCIETY (DPAS) PROPOSED CHANGES WE WOULD LIKE TO SUGGEST THAT THE EXISTING EX SALL YARDS RESIDENTIAL SITE TO THE SOUTH EAST OF MAYFAIR STREET BE RETAINED AND DEVELOPED AS A CARAN AREA PROVIDING.

- a) DIRECT CYCLE / PEDESTRIAN ACCESS BETWEEN HADLEY PARK, DRANS AVENUE AND TOWN JUNCTION.
- b) A BUFFER BETWEEN THE HIGH DENSITY MIXED RESIDENTIAL DEVELOPMENT OF THE SALL YARDS SITE AND THE RESIDENTIAL DEVELOPMENT BETWEEN DRANS AVENUE AND THE RAILWAY MVR.

I seek the following decision from the Council:*

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

PLAN CHANGES TO BE MADE TO ACCOMMODATE THE ABOVE PROPOSAL.

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Helen


Last name:

Adair Denize

Preferred method of contact

Postal

Attached Documents

Name	
Helen A Denize	

Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

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

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

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

* Required information

Name* Helen-Adair Denige

Address* 96 Chapter Street, St Albans, Christchurch Postcode* 8052

Email helen@adair.co.nz Phone no. 021 555 449

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

Organisation's name _____

Your role _____

Trade competition and adverse effects* (select appropriate)

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

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

(a) adversely affects the environment, and

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

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

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

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

☐ I wish to speak in support of my submission on Plan Change 14

☒ I do not wish to speak.

Joint submissions (Please tick this box if you agree)

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

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

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

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

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

Signature Helen-Adair Denige Date 22.04.2023

Housing and Business Choice Plan Change 14

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

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

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

April 22 2023

Re Plan changes 14 & 13.

I note this is a consultation document and that the area circled on page 9 is described as Significant in terms of proposed changes.

I live within this area.

I can understand why six stories may be necessary to house a new St Georges Hospital Complex but I cannot see any advantage in allowing 3 storey developments in the surrounding residential streets.

This neighbourhood used to prize itself as a SAM, some of the character has been eroded due to the demolition of houses in the area and the construction of new ones, however the number of new builds is not significant enough to change the character of the Merivale Suburban precinct.

The area is currently Zoned Residential One which allows for two storey dwellings, which is consistent with the housing development in the area since it began.

The area is however pocketed with TC2 & TC3 sites, a complexity exacerbated by the St Albans Stream which flows through it, and liquefaction which occurred during the major seismic earthquakes, which has left the substrata honeycombed.

Allowing triple stories on smaller allotments will make way for developers to capitalise on high density housing. Quotable Value focusses on Land Value and subjugates improvements if they are not modern. There is an high risk of developers dictating the design of new builds in future making it difficult for individuals to demonstrate design individuality as the market will sell to the highest bidder.

Nor does this area have sufficient roading to support higher density living. It is already severely congested, especially on Papanui road.

I would submit that the nature of the Garden City is likely to be compromised with the proposal to incorporate high density living in this area.

H-A Denize
96 Chapter Street
Christchurch 8052

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Robina


Last name:

Dobbie

Preferred method of contact

Postal

Attached Documents

Name	
Robina Dobbie	

Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

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

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

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

* Required information

Name* Robina Debbie (Rebbie)
Address* PO Box 21413, Edgware, Christchurch Postcode* 8143
Email RobinaDebbie@yahoo.com Phone no. 021-702289

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

Organisation's name TBA
Your role Co-ordinator

Trade competition and adverse effects* (select appropriate)

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

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

(a) adversely affects the environment, and

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

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

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

☐ I wish to speak in support of my submission on Plan Change 13
☒ I wish to speak in support of my ^{response} submission on Plan Change 14 *Definitely + combined rights*
☐ I do not wish to speak.

Joint submissions (Please tick this box if you agree)


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

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

☐ Yes, I have attached extra sheets. ☒ No, I have not attached extra sheets. *Will be provided prior to presentation*

Signature of ^{responder} submitter (or person authorised to sign on behalf of submitter)

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

Signature  Date 10/5/2023
8/5/2023

Have your say

Housing and Business Choice Plan Change 14

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

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

- a) New and modified qualifying matters – one missing
- b) New & modified residential controls – Minimum 2-storey building height in High Density Residential Zone.
- c) Zoning changes – modified high-density zoning around Commercial Centres.

My submission is that:*

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

- a) I believe we need to add on a qualifying matter for the CBD and other vulnerable land due to the dangers from earthquakes (esp. Alpine Fault). Intensification is dangerous for our city as was ~~proven~~ demonstrated by the impact on our city during 2011/12 and the Invercargill residents.
- b) Why a minimum two-storey building height? Forced not choice
- c) Zoning changes may work for other cities. We need Christchurch to be safe as it will be pivotal when the Alpine Fault ruptures – full presentation will be made to justify this.

I seek the following decision from the Council:*

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

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

To stop housing intensification for safety reasons and to stabilise CC as it is pivotal when the Alpine Fault ruptures.

To add the Alpine Faultline as a qualifying matter

A full powerpoint presentation will be provided to council to justify this viewpoint with supporting facts.

Consideration of discussion points of local CCC residents.

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Maureen


Last name:

Kerr

Preferred method of contact

Postal

Attached Documents

Name	
Maureen Kerr	

Have your say

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

RECEIVED

12 MAY 2023

Clause 6 of Schedule 1 Resource Management Act 1991

Emi.

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

Gender: ☐ Male ☒ Female ☐ Non-binary/another genderAge: ☐ Under 18 years ☐ 18-24 years ☐ 25-34 years ☐ 35-49 years ☐ 50-64 years
☒ 65-79 years ☐ over 80 yearsEthnicity: ☒ New Zealand European ☐ Māori ☐ Pacific Peoples ☐ Asian
☐ Middle Eastern/Latin American/African ☐ Other European ☐ Other*** Required information**Name* MAUREEN KERRAddress* 57 WATFORD STREET STROMAN CHRISTCHURCH Postcode* 8052Email maureen.kerr@xtra.co.nz Phone no. 0274177510

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

Organisation's name _____

Your role _____

Trade competition and adverse effects* (select appropriate)☐ I could / ☒ could not gain an advantage in trade competition through this submission.

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

(a) adversely affects the environment, and

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

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

Please indicate by ticking the relevant box whether you wish to be heard in support of your submission*☐ I wish to speak in support of my submission on Plan Change 13☐ I wish to speak in support of my submission on Plan Change 14☒ I do not wish to speak.**Joint submissions (Please tick this box if you agree)**☒ If others make a similar submission, I will consider presenting a joint case with them at the hearing.**If you have used extra sheets for this submission, please attach them to this form and indicate below***☐ Yes, I have attached extra sheets. ☒ No, I have not attached extra sheets.**Signature of submitter (or person authorised to sign on behalf of submitter)***A signature is not required if you make your submission by electronic means.*Signature Maureen Kerr Date 7 -05-2023

Have your say

Housing and Business Choice Plan Change 14

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

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

My submission is that:*

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

I seek the following decision from the Council:*

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

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

Have your say

Housing and Business Choice Plan Change 14

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

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

- 14.2.7.2 HIGH DENSITY LOCATION
- 14.2.8.5 INFRASTRUCTURE SERVICING
- 14.2.8.6 INTEGRATION AND CONNECTION
- 14.6.2 BUILT FORM STANDARDS
- 14.2.4.2 HIGH QUALITY MEDIUM DENSITY RESIDENTIAL DEVELOPMENT
- 7.2.1.2 HIGH TRIP GENERATING ACTIVITIES
- 7.2.1.5 DESIGN OF CARPARKING AREAS

My submission is that:*

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

I STRONGLY OPPOSE THE INTRODUCTION OF HIGH DENSITY RESIDENTIAL DEVELOPMENTS WITHIN THE AREA PAPANUI ROAD TO WATFORD STREET.

- PROTECT THE EXISTING HOUSING ENVIRONMENT OF HIGH QUALITY CHARACTER HOMES
- TRAFFIC CONGESTION ALREADY A CONCERN ALONG WATFORD STREET EXACERBATED BY ST ANDREWS COLLEGE, TENNIS CLUB AND THOROUGHFARES FROM BLIGHS ROAD TO NORMANS ROAD
- CARPARKING A CONTINUAL PROBLEM - WILL BE INTENSIFIED WITH HARD SITES WITH LIMITED OR NO PARKING
- INFRASTRUCTURE ALREADY SATURATED - FLOODING PREVALENT

I seek the following decision from the Council:*

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

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

- REVISE PROPOSAL TO INTRODUCE HIGH DENSITY RESIDENTIAL ZONING IN THIS SUBURB.
- PROTECT AND MAINTAIN SPECIAL CHARACTER AND QUALITY OF EXISTING HOMES IN THIS LOCATION.
- ADDRESS EXISTING ISSUES OF TRAFFIC CONGESTION, CARPARKING, FLOODING LIQUEFACTION
- CONSIDER IMPACT OF HOUSING AFFORDABILITY AND CLIMATE CHANGE AS IT APPLIES TO STROMAN.

Submitter Details

First name: Dawn

Last name: E Smithson

Preferred method of contact Postal

Attached Documents

Name
Dawn E Smithson

Have your say

Housing and Business Choice Plan Change 14

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

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

- 1) Infrastructure - Chapter 14 - In particular
 Section 14.2.8.5 Infrastructure servicing developments
 " 14.2.8.6. Integration & connectivity

My submission is that:*

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

Currently there are already major pressures on infrastructure in the Stronach community, especially in the vicinity of St Andrews College.

- - Demand for on street parking spaces far exceeds number of spaces
- There is increasing congestion especially morning ~~at~~ and at 3pm, double parking, hovering in your driveways. =
- Current stormwater & wastewater are already overloaded which causes flooding & unhealthy storm & wastewater systems.

I seek the following decision from the Council:*

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

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

I strongly ask that Council (REVISE) the high density Residential Zone HRZ, which is proposed for the eastern blocks of Stronach from Normans Rd to Blighs Rd, to Medium Density Residential zone (MRZ) to prevent the increase of current unsafe transport issues & unhealthy stormwater issues.

Have your say

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

RECEIVED

12 MAY 2023

Emi

Clause 6 of Schedule 1 Resource Management Act 1991

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

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

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

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

*** Required information**

Name* DOWN E SMITHSON

Address* 87 NORMANS RD. Postcode* 8052

Email Strowan@xtra.co.nz Phone no. 027555 2045

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

Organisation's name _____

Your role _____

Trade competition and adverse effects* (select appropriate)

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

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

- (a) adversely affects the environment, and
- (b) does not relate to the trade competition or the effects of trade competition? Yes ☐ No ☒

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

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

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

I wish to speak in support of my submission on Plan Change 14

☒ I do not wish to speak.

Joint submissions (Please tick this box if you agree)

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

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

Yes, I have attached extra sheets.

☒ No, I have not attached extra sheets.

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

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

Signature [Signature] Date 9/8/23

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Susanne

Last name: Antill

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

My submission is that:

We totally oppose the new planning rules in the Christchurch District Plan.

These proposals would substantially alter the character of Christchurch for residents of Christchurch and detrimentally affect our quality of life.

It reflects a top down management by a foreigner with globalist allegiances.

The general wording is non specific platitudes. It could mean anything.

1. We oppose replacing existing residential zones in the city with two new ones – a medium density zone and a high density zone.

What rationale? Are you planning for massive overseas population immigration into Christchurch for a 15 minute smart city when the birth rate of Christchurch residents is low, particularly after the mandated experimental, untested jabs on young New Zealanders which has probably sterilized many of them.

2. We oppose increased height limits of buildings. Christchurch is on an aquifer flood plane and subject to earthquakes. This is totally crazy.

3. What does this sentence mean: “ Special rules for housing and business to better reflect our city’s environment and climate”?

4. What does this sentence mean:” Heritage that should be protected, with a number of new buildings, items and interiors added to the Schedule of Significant Historic Heritage.”?

This does not make sense.

Are you trying to pull a fast one? And are you going to destroy anything that you do not deem to be of historical significance? Will you destroy the character of Christchurch the way you deconstructed and destroyed the Christchurch Library?

There is no mention here of 5G.

We totally oppose denser housing which will actually cut sunlight from residences.

We oppose 15 minute cities which will curtail our freedom

We oppose smart cities which will be detrimental to our health

We oppose 5G towers which pose a significant threat to both our freedom and our health

We oppose mass overseas immigration into Christchurch which is a globalist agenda not a Christchurch citizens agenda.

This council does not listen to what residents want and runs rough shod over the opinions and wishes of Christchurch residents. For example the Harewood Road Cycleway which was opposed by the majority of Harewood residents.

Susanne Antill

Janice Antill

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Scott

Last name: Tindall

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose


I seek the following decision from the Council

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

My submission is that:

I oppose the proposal to include the Hornby area as high density housing. We live in a cul-de-sac and believe that the proposed changes would affect our lifestyle and community in a negative way. Already we are seeing medium housing density increasing and its a eye sore in an area where family's live in predominantly single level 1970s dwelling the apartment housing is an eyesore and not acceptable in our community. The infrastructure is already under pressure and there are no plans in place to improve this, example and single toilet dwelling has been removed and replaced with 4 dwellings each with 2 toilets! On top of that each site has limited parking which leads to cars parking on the street which makes them more susceptible to being interfered with. Thanks you for taking time to review my response I look forward to a positive outcome for our community.

Attached Documents

Name
Scott Tindall email 

Cui, Aviva

From: Scotty Tindall (Laminex) <Scott.Tindall@laminex.co.nz>
Sent: Tuesday, 16 May 2023 3:45 pm
To: Engagement
Subject: RE: Submission opposing high density housing

Hi Aviva

Please see below my answers to your questions in blue –

Thanks for your help.

Kind regards

Scott Tindall

Operations Manager Lower North Island & South Island
 7 Gallagher Drive, Hornby, Christchurch 8042
 T: +64 3 379 8640 | F: +64 3 366 7608 | M: +64 21 244 8179
www.laminexnewzealand.co.nz



From: Engagement <engagement@ccc.govt.nz>
Sent: Tuesday, 16 May 2023 2:44 PM
To: Scotty Tindall (Laminex) <Scott.Tindall@laminex.co.nz>
Subject: FW: Submission opposing high density housing

Caution: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Kia ora Scott,

Thank you so much for your feedback on PC14. I apologise for the difficulties that you encountered with our system.

Can you please answer the questions below? Then I can lodge your submission to the correct consultation form.
The plan change consultation has a compulsory form (this is a requirement of the relevant central government legislation), which means there are additional sections that you need to complete to provide feedback.

1. **Trade competition** and adverse effects: [could not](#)
2. **Gain an advantage in trade competition** through this submission: [I am not](#)
(Note: if you are a person who could gain an advantage in trade competition through the submission, your right to make submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resources Management Act 1991).
1. Would you like to present your submission in person at a **hearing**? [Yes](#)
2. If others, make a similar submission I will consider **presenting a joint case** with them at the hearing (do not tick if you would not consider a joint case). [Yes](#)

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

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: Jane West <jane@jwest.co.nz>

Sent: Friday, 12 May 2023 8:29 pm

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

Subject: Fwd: Submission opposing high density housing

Hi there

Here's a submission that didn't quite get through online.

Thanks

Jane

Jane West

Friend of Submitters

Get [Outlook for iOS](#)

From: Scotty Tindall (Laminex) <Scott.Tindall@laminex.co.nz>

Sent: Friday, May 12, 2023 8:26:36 PM

To: Jane West <jane@jwest.co.nz>

Subject: Submission opposing high density housing

Hi Jane

Please see our submission below for the CCC, we had trouble trying to enter it online.

I oppose the proposal to include the Hornby area as high density housing. We live in a cul-de-sac and believe that the proposed changes would affect our lifestyle and community in a negative way. Already we are seeing medium housing density increasing and its a eye sore in an area where family's live in predominantly single level 1970s dwelling the apartment housing is an eyesore and not acceptable in our community. The infrastructure is already under pressure and there are no plans in place to improve this, example and single toilet dwelling has been removed and replaced with 4 dwellings each with 2 toilets! On top of that each site has limited parking which leads to cars parking on the street which makes them more susceptible to being interfered with. Thanks you for taking time to review my response I look forward to a positive outcome for our community.

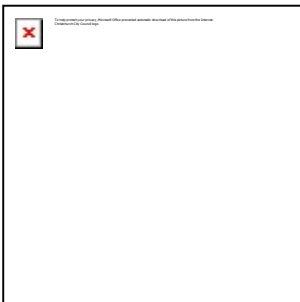
Kind Regards

Scott & Rachael Tindall
15 Dunluce Pl, Hornby 8042
0212448179

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Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Amy

Last name:

Coleburn


Organisation:

Oyster Management Limited

Preferred method of contact

Email

Attached Documents

Name	
Henry Sullivan - Oyster Ltd Email Submission	

Jackson, Andrew

From: Henry Sullivan <Henry.Sullivan@minterellison.co.nz>
Sent: Friday, 12 May 2023 2:55 pm
To: Engagement
Cc: Bianca Tree
Subject: Oyster Management Limited - Submission on Plan Change 14 [MERWNZ-MERWLIB.FID729381]
Attachments: Oyster Management Limited - Submission on Plan Change 14(901324800.1).pdf

Kia ora

We act for Oyster Management Limited (**Oyster**).

Please see **attached** a submission on behalf of Oyster on Plan Change 14 to the Christchurch District Plan.

We would appreciate if you can please confirm receipt of this submission.

Ngā mihi
Henry

Henry Sullivan

Solicitor

T +64 9 353 9942M +64275550829

henry.sullivan@minterellison.co.nz

MinterEllisonRuddWatts

minterellison.co.nz | LinkedIn



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OYSTER MANAGEMENT LIMITED SUBMISSION ON PLAN CHANGE 14 TO THE CHRISTCHURCH DISTRICT PLAN

To: Christchurch City Council
53 Hereford Street
Christchurch
8154

Engagement@ccc.govt.nz

Name of Submitter: Oyster Management Limited

Address: c/- MinterEllisonRuddWatts
PO Box 105249
AUCKLAND 1143
Attention: Bianca Tree

bianca.tree@minterellison.co.nz
henry.sullivan@minterellison.co.nz

Introduction

1. Oyster Management Limited (**Oyster**) appreciates the opportunity to make a submission on Plan Change 14 to the Christchurch District Plan (**PC14**). PC14 was notified by Christchurch City Council (**Council**) on 17 March 2023.
2. Oyster's comments on PC14 and relief sought are set out in full in the table at **Appendix A** to this submission. Oyster supports PC14 to the extent that it enables a well-functioning urban environment.
3. Oyster could not gain an advantage in trade competition through this submission.

Background to Oyster and its Christchurch properties

4. Oyster is a commercial property and fund manager that manages a portfolio of office, retail, large format retail, and industrial properties throughout New Zealand. Oyster manages approximately \$2 billion in assets.
5. Oyster's office assets comprise of commercial business parks and CBD offices. Its retail assets include regional shopping centres, outlet centres,

suburban convenience centres, large format retail, and supermarkets, and its industrial assets comprise of logistic, manufacturing, and warehouse facilities in established industrial areas.

6. In Christchurch, Oyster's portfolio includes 229 Tuam Street, which is occupied by Kathmandu (**Site**). The Site is shown in the planning maps attached as **Appendix B** to this submission.
7. Oyster also manages the Dress Smart site at 411 Main South Road, Hornby, which is owned by Lendlease. This submission does not relate to the Dress Smart site.

Reasons for relief sought

8. The specific provisions subject to this submission and reasons for the relief sought are set out in the table at **Appendix A** to this submission.
9. In addition to the specific reasons in Appendix A, Oyster supports the proposed changes to the provisions in PC14 where those changes:
 - (a) give effect to the objectives and policies of the National Policy Statement on Urban Development 2020 (**NPS-UD**);
 - (b) contribute to well-functioning urban environments;
 - (c) are consistent with the sustainable management of physical resources and the purpose and principles of the Resource Management Act 1991 (**RMA**);
 - (d) meet the requirements to satisfy the criteria of section 32 of the RMA;
 - (e) meet the reasonably foreseeable needs of future generations; and
 - (f) are consistent with sound resource management practice.

Relief sought

10. The relief sought by Oyster is set out in the table at **Appendix A** to this submission.

11. In addition to the specific relief sought in Appendix A, Oyster seeks such additional or consequential relief to give effect to the matters raised in this submission.
12. Oyster wishes to be heard in support of its submission.
13. If others make a similar submission, Oyster will consider presenting a joint case with them at a hearing.

DATED this 12th day of May 2023

Oyster Management Limited by its
solicitors and duly authorised agents
MinterEllisonRuddWatts



Bianca Tree

Address for service of submitter

Oyster Management Limited c/- MinterEllisonRuddWatts
P O Box 105249
AUCKLAND 1143
Attention: Bianca Tree / Henry Sullivan

Telephone No: (09) 353 9700

Fax No. (09) 353 9701

Email: bianca.tree@minterellison.co.nz
henry.sullivan@minterellison.co.nz

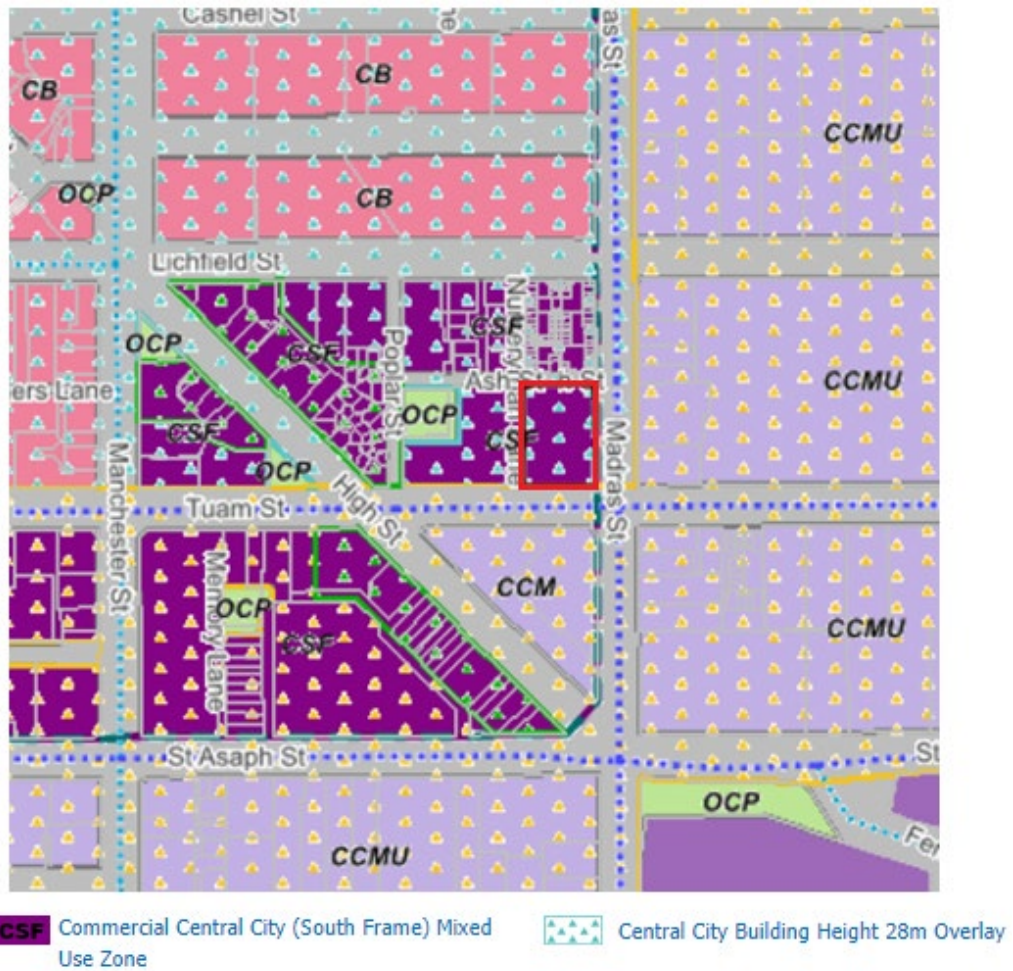
Appendix A – Submission on behalf of Oyster Management Limited on Plan Change 14 to the Christchurch District Plan (PC14)

	Chapter / Sub-part	Specific provision / matter	Position	Submission and reasons	Relief sought
1.	PC14 planning maps	As shown in Appendix B the block bordered by Tuam Street, Madras Street, Lichfield Street, and Manchester Street (Block), which includes the Site, is proposed to be included in the Central City Mixed use Zone (South Frame) zone.	Oppose	Oyster opposes the inclusion of the Block in the Central City Mixed use Zone (South Frame) zone. Oyster considers that the Block should be rezoned to Cite Centre Zone (or alternatively to Central City Mixed Use zone) because the Block is contiguous with those zones and those zones will better give effect to the direction in the NPS-UD to provide sufficient development capacity to meet the expected increase in demand for business land in Christchurch.	Rezone the Block to City Centre zone. Alternatively, rezone the Block to Central City Mixed Use zone.
2.	Central City Maximum Building Height Planning Map	As shown in Appendix B, the Block is currently within the 28m Central City Building Height Overlay under the Operative Christchurch District Plan In the PC14 Central City Maximum Building Height Planning Map (see Appendix B) the Block is included in the 21m Central City Building Height Overlay.	Oppose	Oyster seeks greater height for the Site and other sites in the Block. Oyster considers that it is not appropriate to reduce the Maximum Building Height that applies to the Block because the NPS-UD directs that the Council must provide sufficient development capacity to meet the expected increase in demand for business land. To give effect to this direction, Oyster considers that it is appropriate to provide for greater height in the Block. The appropriate height will depend on what zoning is applied to the site: 1. If the Block is rezoned to City Centre zone, it is appropriate to apply the 90m Central City Building Height Overlay to the Block because the Block is contiguous with the area where the 90m Central City Building Height Overlay is proposed. 2. Alternatively, if the block is rezoned to Central City Mixed Use Zone, or remains Central City Mixed Use Zone (South Frame), it is appropriate that the 32m Central City Building Height overlay is applied to the Block because the Block is contiguous with the area to the east that is subject to the proposed 32m Central City Building Height Overlay.	Amend the Central City Maximum Building Height Overlay map to: 1. Apply the 90m Central City Building Height Overlay to the Block if the Block is included within the City Centre zone; or 2. Apply the 32m Central City Building Height overlay to the Block if the block is rezoned Central City Mixed Use Zone, or remains Central City Mixed Use Zone (South Frame).
3.	Central City Mixed Use Zone (South Frame)	Rule 15.13.1.2.C1	Oppose	Oyster seeks that new buildings, external alterations to existing buildings, or the use of any part of a site not occupied by a building are permitted activities within the Central City Mixed Use Zone (South Frame), provided that the relevant standards, including the Building Height Standard, are complied with.	Delete Rule 15.13.1.2.C1
4.		Rule 15.13.1.3.RD1	Oppose	Oyster considers that providing for these activities as permitted activities better gives effect to the direction in the NPS-UD to provide sufficient development capacity to meet the expected increase in demand for business land in Christchurch.	Delete Rule 15.13.1.3.RD1
5.		Rule 15.13.1.3.RD5	Oppose in part	Oyster opposes the discretionary activity status for an activity that exceeds the maximum height for building base.	Amend Rule 15.13.1.3.RD5 as notified to provide: Any activity listed in Rule 15.13.1.1 P1 to P156 and Rule 15.13.1.3 RD1 to RD4 and RD6 that does not meet one or more of the built form standards in Rule 15.13.2, except 15.13.2.1(a)(i)(b) , unless otherwise specified.
6.		Rule 15.13.1.4.D2	Oppose		Delete Rule 15.13.1.4.D2
7.		Standard 15.13.2.1 Building Height	Support in part Oppose in part	Oyster supports the Building Height Standard to the extent that the maximum height of a building is 32m, or the height identified in the Central City Maximum Building Height planning map (if applicable). Oyster opposes the maximum height for building base and seeks that it is removed. The height limit on a building base is an additional and unnecessary restriction on building height.	Retain Standard 15.13.2.1(a)(i)(a) Delete Standard 15.13.2.1(a)(i)(b)

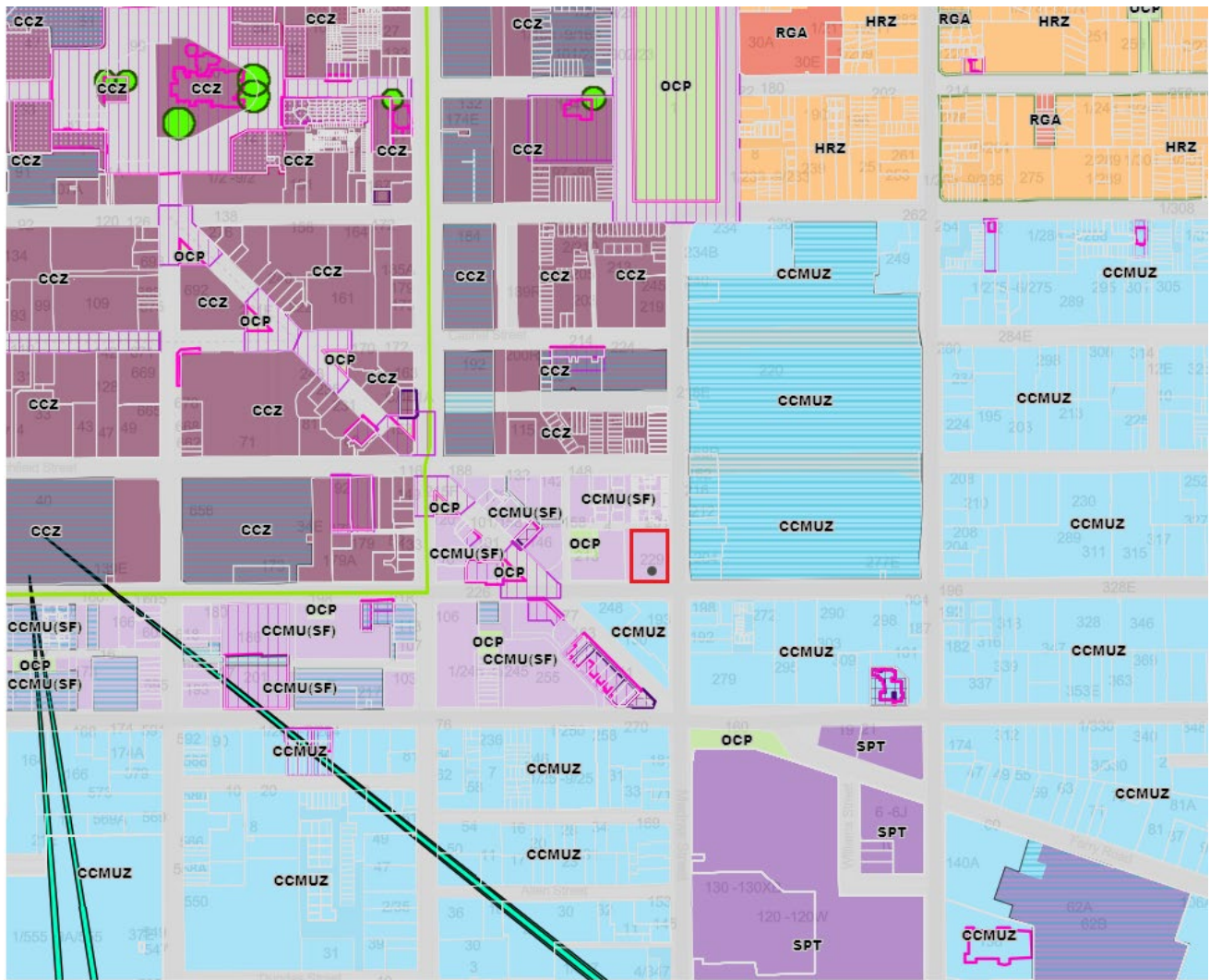
	Chapter / Sub-part	Specific provision / matter	Position	Submission and reasons	Relief sought
8.	Central City Mixed Use Zone	Rule 15.12.1.3.RD2	Oppose in part	Oyster opposes the discretionary activity status for an activity that exceeds the maximum height for building base.	Amend Rule 15.12.1.3.RD2 as notified to provide: Any activity listed in Rule 15.12.1.1 P1 to P20 that does not meet one or more of the built form standards in Rule 15.12.2, except 15.12.2.2(b) , unless otherwise specified.
9.		Rule 15.12.1.4.D2	Oppose		Delete Rule 15.12.1.4.D2
10.		Rule 15.12.1.3.RD5	Oppose	Oyster seeks that new buildings and external alterations to existing buildings are permitted activities within the Central City Mixed Use Zone (South Frame), provided that the relevant standards, including the building height standard, are complied with. Rule 15.12.1.3.RD5 effectively sets a 17m height limit. The height limit is more appropriately set by the Building Height Standard at 15.12.2.2(a), with reference to Central City Maximum Building Height planning map (if applicable).	Delete Rule 15.12.1.3.RD5
11.		Standard 15.12.2.2 Building Height	Support in part Oppose in part	Oyster supports the Building Height Standard to the extent that the maximum building height is 32m, or the height identified in the Central City Maximum Building Height planning map (if applicable). Oyster seeks that the maximum height of 17 metres for the building base is removed. The height limit on a building base is an additional and unnecessary restriction on building height.	Retain Standard 15.12.2.2(a) Delete Standard 15.12.2.2(b)
12.	City Centre Zone	Rule 15.11.1.2.C1	Oppose	Oyster seeks that new buildings, external alterations to existing buildings, or the use of any part of a site not occupied by a building are permitted activities within the City Centre zone, provided that the relevant standards, including the Building Height Standard, are complied with.	Delete Rule 15.11.1.2.C1
13.		Rule 15.11.1.3.RD1	Oppose	Oyster considers that providing for these activities as permitted activities better gives effect to the direction in the NPS-UD to provide sufficient development capacity to meet the expected increase in demand for business land.	Delete Rule 15.11.1.3.RD1
14.		Rule 15.11.1.3.RD5	Support	Oyster supports the restricted discretionary activity status for activities that do not comply with built form standards, including the building height standard.	Retain Rule 15.11.1.3.RD3
15.		Rule 15.11.1.4.D1	Oppose in part	Oyster opposes the discretionary activity status for an activity that exceeds the maximum height for a building base or the maximum road wall height standard. The height limits on a building bases and road walls are additional and unnecessary restrictions on building height.	Amend Rule 15.11.1.4.D1 as notified to provide: Any activity that does not meet one or more of built form standards in Rules 15.11.2.11(a)(i)(B), (a)(ii), (a)(iii) and (a)(iv)(B) (Building Height) and/or 15.11.2.12 (Maximum Road Wall Height) unless otherwise specified.
16.		Standard 15.11.2.11 Building Height	Support in part Oppose in part	Oyster supports the Building Height standard to the extent that the maximum building height is 90m. Oyster seeks that the maximum height of 28m for the building base is removed. The height limit on a building base is an additional and unnecessary restriction on building height.	Retain Standard 15.11.2.11(a)(i)(A) Delete Standard 15.11.2.11(a)(i)(B)
17.		Standard 15.11.2.12 Maximum road wall height	Oppose	Oyster opposes the Maximum road wall height standard. Limiting height of the road wall is an additional and unnecessary restriction on building height.	Delete 15.11.2.12

Appendix B – Planning maps

Operative Christchurch District Plan map – 229 Tuam Street

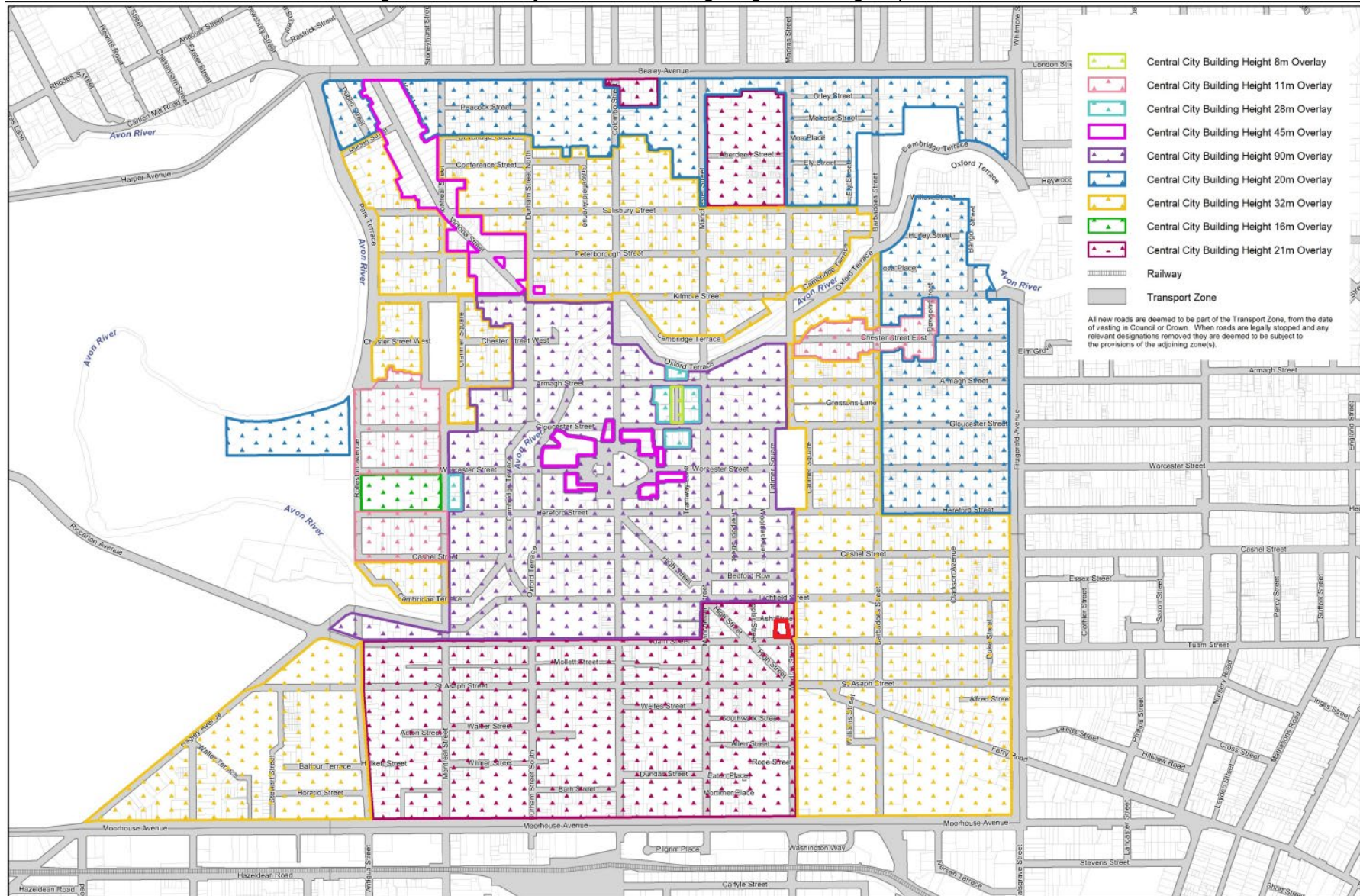


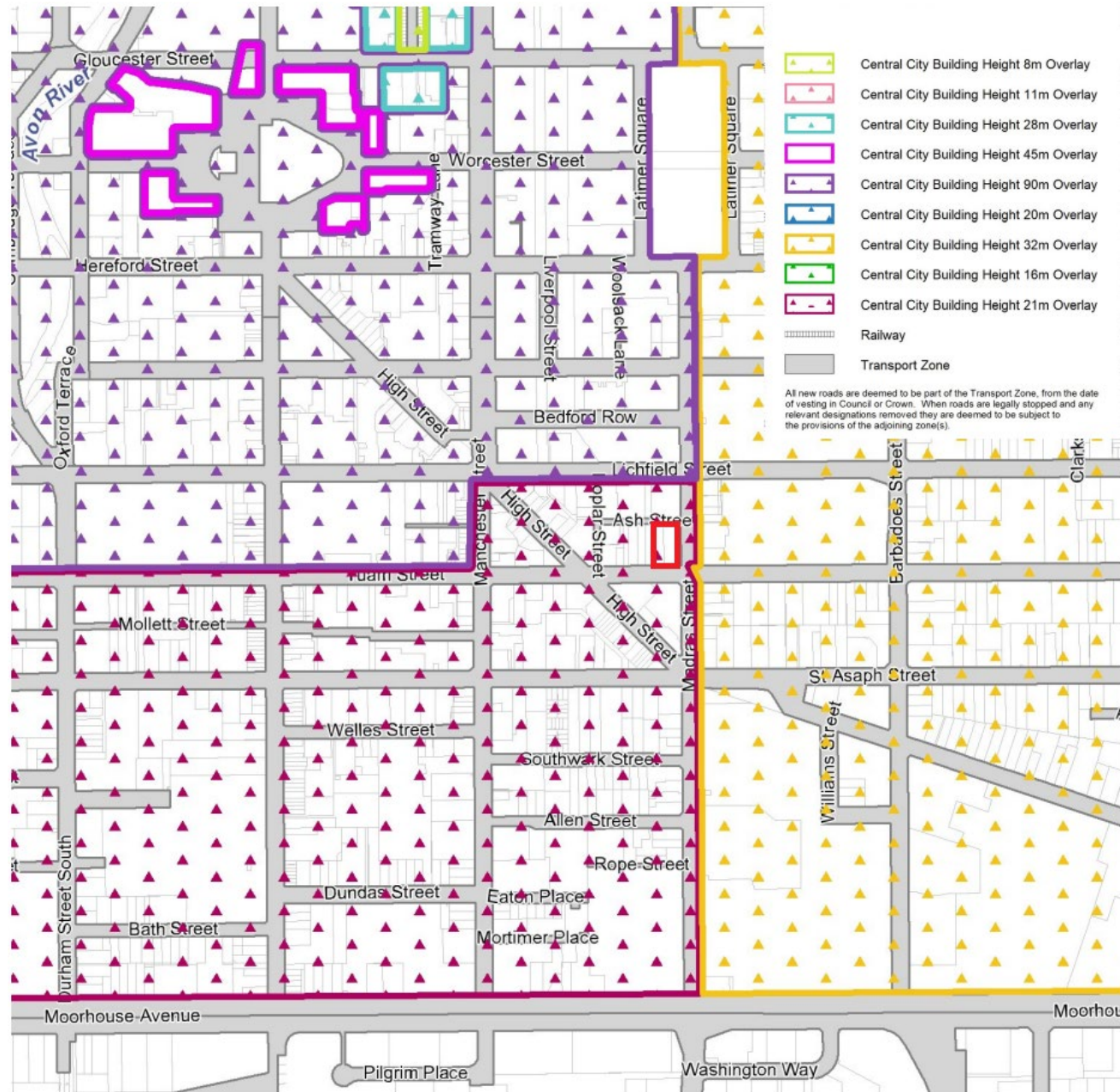
Plan Change 14 planning map – 229 Tuam Street



- CCMUZ Central City Mixed Use Zone
- CCMUZ(SF) Central City Mixed Use Zone (South Frame)
- CCZ City Centre Zone

Plan Change 14 Central City Maximum Building Height Planning Map – 229 Tuam Street





Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

David


Last name:

Lawry

Preferred method of contact

Email

Attached Documents

Name	
12052023083834	

Save time and do it online

ccc.govt.nz/haveyoursay

Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

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

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

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

* Required information

Name* DAVID LAWAY

Address* 500 GARDHURST ROAD RD6 CHRISTCHURCH Postcode* 7676

Email 143WALK143@gmail.com Phone no. 0272348117

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

Organisation's name _____

Your role _____

Trade competition and adverse effects* (select appropriate)

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

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

(a) adversely affects the environment, and

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

☐ Yes ☐ No

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

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

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

☒ I wish to speak in support of my submission on Plan Change 14

☐ I do not wish to speak.

Joint submissions (Please tick this box if you agree)

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

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

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

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

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

Signature D. Laway Date 11/5/2023

Have your say

Housing and Business Choice Plan Change 14

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

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

Qualifying MATTERS including Air Noise contours

My submission is that:*

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

As per attached documentation

I seek the following decision from the Council:*

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

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

That Air Noise contours not be allowed as a
Qualifying Matters to effectively negate any
ability to provide the council predicted need
for 40,000 new houses.

More specifically the 50 dBA L_{dn} air noise contour

Remedies as per attached report

Have your say

Heritage Plan Change 13

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

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

My submission is that:*

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

I seek the following decision from the Council:*

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

Plan Change 14 Submission

By David Lawry:

Christchurch City Council (CCC) is predicting the need for 40,000 new houses in Christchurch over the next 30 Years.

- 1) CCC studies have identified large tracts of land that are unfit for housing development due to sea rise and other flood risks. Unfortunately for the people already living in many of these now identified risk suburbs, they will be adversely impacted. New subdivisions at the foot hills of the Port Hills, known to be flood risks, continue to be consented.
- 2) It is public knowledge that CCC is facing very significant Governance failures with respect to its owned company's such as Christchurch International Airport (CIAL) and Lyttelton Port. These failings extend into the very body that is supposed to provide the needed governance, Christchurch City Holding Corporation (CCHL). The fact that CCHL's past Chair was a wanted FBI fugitive is just one indicator of the level of failure. While the current CCC, CEO has worked to address some of these matters there exists major conflict of interest issues that are providing significant competitive advantages to, for example CIAL. I refer the panel to my in-depth submissions on this matter in Christchurch Plan Change 5. What is clear however is that due to the 'no surprises clause requirement' of CCHL to the CCC CEO that regardless of the structure it is the CCC CEO who has the power to direct both the board and if need be actual company CEO's. If the CCC CEO can move to do away with CCHL altogether then the real power to direct changed behaviours is held at that position.
- 3) Plan Change 14 is stated as being designed to bring Christchurch's District Plan in line with government direction that has been given via the National Policy Statement-Urban Development (NPS-UD) and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act (The Act) to enable more development in the city's existing urban Footprint.

- 4) However it quickly becomes clear via the raft of new and modified Qualifying Matters that what is at play in this plan change, is a move to significantly push back against the new national standards.
- 5) While the lawyers, consultants, planners and others on billable hours will enjoy this farce the question remains: Where will the needed 40,000 new homes be enabled?
- 6) It has been indicated that a very high threshold of evidence is needed in order to establish an issue as a Qualifying Matter. The impact of these matters is to defeat the very intent of the Governmental intensification direction. Therefore it is not surprising that the evidential threshold should be extremely high. The legal battles over what is and is not deemed to be a Qualifying matter will, I submit ensure that the needed intensification will be stalled, significantly.
- 7) The Qualifying Matter that I am submitting on is the CIAL Air Noise residential activity avoidance contour, specifically the 50 dBA Ldn air noise Contour. This noise level equates to slightly elevated speech. This contour impacts and negates new residential home building on hundreds of acres surrounding the Christchurch International Airport. These contours were required to be re-evaluated every ten years last due in 2017, and are currently subject to protracted re-evaluation following Regional Councils requiring CIAL to do so in 2022.
- 8) The purpose of the contour régime is stated as ensuring that no curfew will result from noise complaints arising from the airport operations. What is more they are designed to capture the expected noise level when the airport reaches absolute capacity of flight activity. These contours have been exaggerated and inaccurate for in excess of 30 years, yet CCC have enabled this inaccuracy and allowed the competitive advantages that flow to CIALs property management business activities to remain. Additionally CCC has abdicated its statutory requirement to investigate industrial noise pollution handing this over to a CIAL housed committee. CCC noise control personnel take no action with regards to any airport related noise complaints. CCC refuses to even consider alternative methodologies to providing curfew risk reduction, such as contracting out of noise complaint actions. These matters

and the associated risks arising from the ongoing lack of remedies have been raised directly to the current CCC CEO. Action by her is needed now if real governance is to be exhibited.

- 9) If the 50dBA Ldn air noise contour is permitted to be entrenched as a Qualifying Matter then the opportunity for residential housing to be enabled on the safest remaining undeveloped land in Christchurch will be lost. Again where are these 40,000 new homes going?
- 10) The fact is that CCC are well aware that the background noise levels due to population levels alone and excluding road noise for a significant proportion of the land under the 50 dBA Ldn air noise contour already exceeds 50 dBA. This evidence was provided to them by world leading expert Professor John Paul Clarke during the Judge led Christchurch District Plan hearings but remains ignored. This fact makes a mockery of these development restrictions.
- 11) One opportunity cost to rate payers is the on- going annual value of thousands of new rates that could potentially be derived from new residential properties that are current excluded due to this policy..
- 12) The actual costs outlined in points (9) and (11) are huge. They are being incurred based on an unrealistic, CIAL led and self-serving need for protection from a perceived risk that noise complaints could result in flight operation curfews. Yet the actual risk of CCC ever taking any action against its own company that resulted in a curfew or any action that impeded its operations is zero. The policy provides CIAL with a huge competitive advantage to its already monopolistic aviation operations and perversely its property development and management operations. It is not by chance that CIAL earns more from property development and management than from aviation activities. Yet the CCC, CEO fails to intervene.
- 13) Then there is the issue of CIAL desiring to build a new wide body aircraft capable international airport at Tarras. Why are CCC providing air noise contour protection for CIAL at Christchurch International Airport, based on an unrealistic total runway capacity, and incurring the opportunity costs outlined, when it is clear that CIAL intends to move its aviation market growth strategies away from Christchurch to Tarras? Already CIAL has significantly

reduced its annual dividend to CCHL, CCC, and therefore rate payers. Already CIAL via FX issued bonds have raised several hundred millions of dollars in new debt. Conservative estimates obtained indicate that the cost of the new runway if built at Tarras would exceed 1 billion dollars. To be clear this is just the runway tarmac asphalt alone not terminals and the numerous other facilitates. Then there is the tricky issue that CIAL has failed to actually buy sufficient land to build the runway needed for wide body aircraft operations. Additionally there are very significant consenting hurdles including the fact that the proposed runway is to be built on the New Zealand Crested Grebes main breeding ground. Where are the funds coming from?

- 14) I mentioned Governance failures at CCHL, which may or may not have been addressed. I submit that for all the reasons outlined there needs to be an urgent review as to how the situation has been reached whereby CIAL have managed to become the dog and CCC the tail being wagged.

THE SOUGHT REMEDIES

- 1) That the 50dBA Ldn air noise contour be excluded from becoming a Qualifying Matter**
- 2) That an urgent CCC CEO level review of the risk to housing crisis solutions and potential rate revenue earning opportunity that will be lost if hundreds of acres of safe land is to be excluded from residential development opportunity based on the curfew risk myth .**
- 3) That the CCC CEO urgently consider the ramifications of supporting CIAL led evidence before the ECAN administered revaluation of the existing air noise contours using airport total future capacity. Is the air noise contour régime fit for purpose given that CIAL is moving its market growth strategies to Tarras? Why have other options not even been considered? Where are the funds for this new airport coming from and how does encouraging passengers to avoid Christchurch in favour of Tarras economically assist Christchurch's economy. Where is the transparency of a cost benefit analysis supporting this huge project? Indeed where is the much talked about Governance, transparency and**

guidance so badly required in order to correct the current flawed behaviours and CIAL project pathways?


D.M. LAWRY

Jackson, Andrew

From: Jongmoon Jeon <hornbycopyplus@gmail.com>
Sent: Friday, 12 May 2023 8:44 am
To: 143walk143@gmail.com; Engagement
Subject: Please find the attach
Attachments: 12052023083834.pdf

Plan change 14 consultation submission from David Lawry.

Please don't reply to me. I am just a man from a copy centre.

Please contact David directly.

Thank you

Submitter Details

First name: Laura

Last name: Stewart

Organisation: Daresbury Ltd

On behalf of: Daresbury Ltd

Preferred method of contact	Email
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Attached Documents

Name
Daresbury Submission Email

Jackson, Andrew

From: Laura Stewart <Laura.Stewart@chapmantripp.com>
Sent: Friday, 12 May 2023 4:57 pm
To: Engagement
Cc: Jo Appleyard; Lucy Forrester
Subject: Submission on proposed Housing and Business Choice Plan Change (PC14)
Attachments: PC14 Submission - Daresbury Limited.pdf

Good afternoon,
Please find **attached** submission on behalf of Daresbury Limited in relation to PC14.
Ngā mihi | Kind regards

LAURA STEWART (she/her)

LEGAL ADMINISTRATOR

Chapman Tripp

D: +64 3 353 0393

www.chapmantripp.com

Disclaimer

This email is intended solely for the use of the addressee and may contain information that is confidential or subject to legal professional privilege. If you receive this email in error please immediately notify the sender and delete the email.

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: Daresbury Limited

- 1 This is a submission on the proposed Heritage Plan Change 14 (*PC14*) to the Christchurch District Plan (the *District Plan*).
- 2 Daresbury Limited could not gain an advantage in trade competition through this submission.
- 3 Daresbury Limited's submission relates to the whole of PC14. The specific relief sought by Daresbury Limited is set out at **Appendix 1** and elaborated on below.
- 4 Daresbury Limited wishes to be heard in support of the submission.
- 5 If others make a similar submission, Daresbury Limited will consider presenting a joint case with them at a hearing.

DARESBUY HOUSE

- 6 Daresbury Limited owns land located within Fendalton Road, Daresbury Lane, and Harakeke Street as shown below:



Figure 1: Approximate location of site shown in red

Heritage items and settings

- 7 That land is covered by a heritage setting (heritage setting number 602) and includes a heritage item (Daresbury House – heritage item number 185). The extent of the heritage item and setting is shown below:

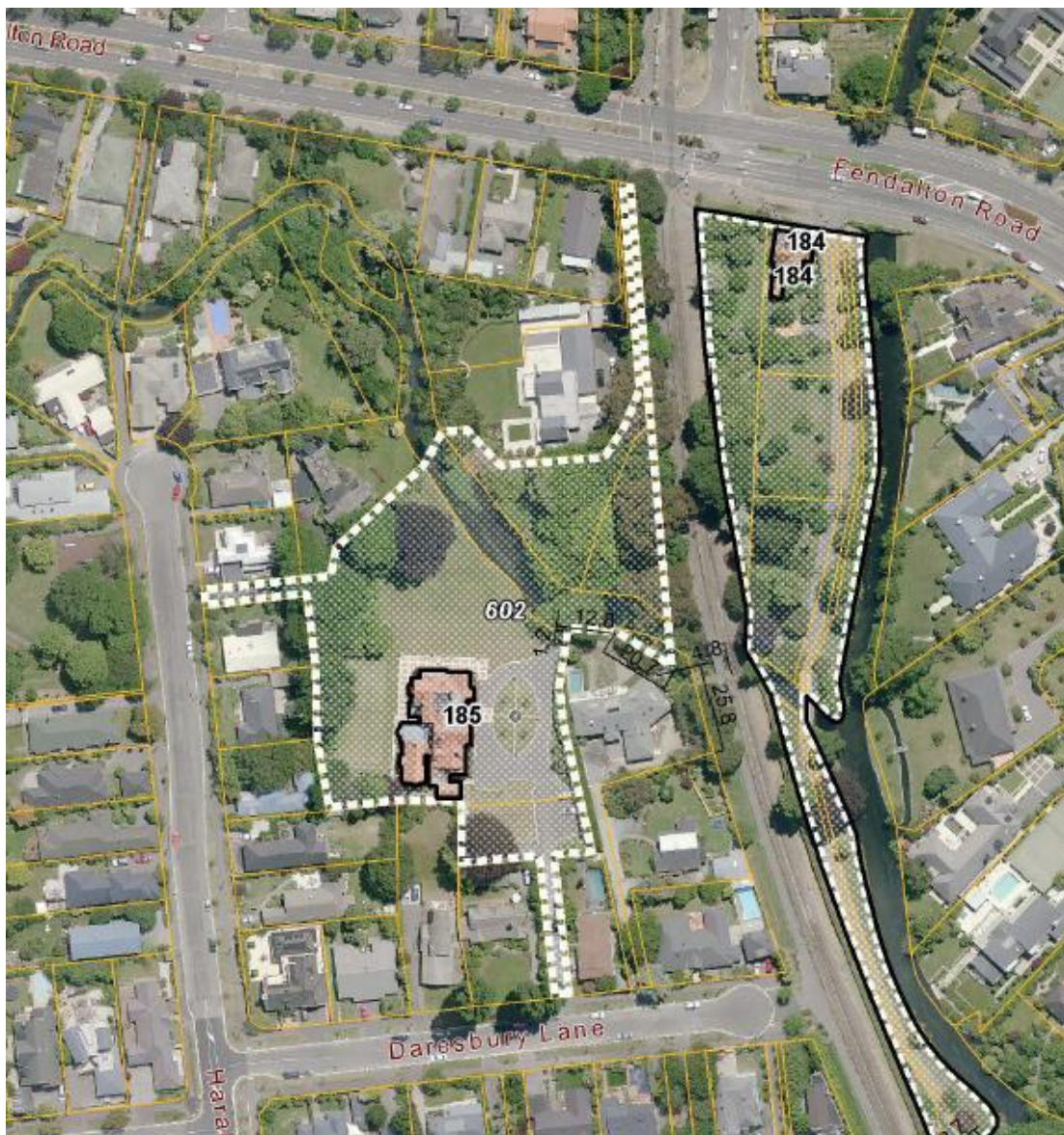


Figure 2: Map showing location of heritage item 185 and heritage setting 602

- 8 Daresbury House was once a significant heritage homestead but has been heavily damaged by the Canterbury earthquakes and has sat in limbo since 2011.
- 9 Since acquiring the site on an 'as is where is' basis from the previous owner, Daresbury Limited has commissioned detailed engineering, quantity surveying, and heritage reports to examine whether Daresbury House can be economically restored in a manner that is sensitive to its heritage values. The findings of these reports is that first, restoration is simply not economically feasible, and second the extent of such works would result in the loss of significant heritage fabric such that the resultant building would largely constitute a replica rather than an authentic restoration.
- 10 The extensive repair work that would be required to make the building structurally sound effectively requires destruction of the remaining heritage fabric of the

building. The building is dangerous, well below Building Code standards, and is not inhabitable.

- 11 Much of its heritage features are lost. Repairing the building so that it can be viably used and bringing it up to Building Code requirements will result in even further loss of heritage fabric (due to the scale and extent of the structural engineering work needed) and will be so expensive that it is economically unviable. Daresbury House's heritage status is considerably diminished and can no longer be considered significant. This building should no longer be included on the Schedule.
- 12 The heritage setting associated with Daresbury House is extensive – on both the north and south sides of the Waimairi Stream. Subdivision consent has been granted for that land north of the Waimairi Stream, the works associated with the subdivision are now complete and the titles are on the market. As noted above, Daresbury House has been extensively earthquake damaged and no longer has significant heritage values. This heritage setting should therefore be removed in its entirety.
- 13 The scope of PC14 is broad and presents a timely opportunity to review the extent of the schedule of heritage items. Such a review is especially relevant in instances where additional information on individual items has become available following the District Plan Review. The provision of such information is integral to the need to carefully weigh costs and benefits of any proposed regulation (such as scheduling) under s 32 RMA.
- 14 PC14 provides a good opportunity to review the heritage listings in the District Plan, and provide for the removal of some of the listed items so that they may be demolished where appropriate and consistent with Policy 9.3.2.2.8.
- 15 Daresbury Limited therefore seeks that:
 - 15.1 Daresbury House (Heritage Item 185) be removed from the Schedule of Significant Historic Heritage in Appendix 9.3.7.2 of the District Plan; and
 - 15.2 Associated Heritage Setting 602 be removed from the same.

Significant and other trees

- 16 The Site already contains a number of listed individual significant trees in the District Plan. The District Plan already provides a set of provisions for the protection of such trees.
- 17 PC14 proposes to introduce trees identified as 'qualifying matters'. It is understood that for a tree to be a 'qualifying matter' it must be assessed at over 100 years in age. It is not clear why this is also required in addition to its original listing in the District Plan. These provisions are not efficient or effective and the operative provisions managing development in the vicinity of listed trees are considered appropriate, effective and efficient.
- 18 The 'qualifying matter trees' proposed for the Site are opposed. The assessment included in the section 32 report is brief and does not justify the inclusion of this

tree as a qualifying matter tree. Qualifying matters, given their restrictions on development rights of private property, should be thoroughly tested and assessed.

Financial Contributions Policy

- 19 The proposed tree canopy cover and financial contributions provisions are unworkable and unreasonable.
- 20 The provisions are difficult to understand and create considerable uncertainty. For example:
 - 20.1 If trees are retained over and above the 20% cover threshold will a financial credit be provided to the applicant?
 - 20.2 It is not clear who would be qualified to undertake the assessment of the canopy cover.
 - 20.3 The proposed definitions of PC14 introduce the definition of a 'hedge' with specific reference to the tree canopy cover and financial contributions provisions, yet those provisions do not utilise that term.
 - 20.4 If a stormwater basin is heavily planted in native shrubs, should this receive a credit as plants (and not just trees) also provide for carbon sequestration?
 - 20.5 How will the timing of assessment work in relation to consenting processes? For greenfield subdivisions for example, landscape plans are often not completed until after resource consent is issued.
- 21 The canopy cover provisions would be difficult to enforce. If canopy cover is determined as acceptable at the time of resource consent and 10 years or 15 years later one or some of those trees are cut down, who monitors and enforces that requirement? Does Council have the staff resources to maintain that level of monitoring across wide swathes of the city?
- 22 Councils increasingly seek a reduction in reserve areas within greenfield subdivisions, on the basis of ongoing maintenance costs for the Council. It would be very difficult to achieve a 20% of net site area coverage in most greenfield subdivisions, noting that those reserve areas are also required for other purposes such as playground and open grass for play areas, that are incompatible with extensive tree canopy cover.
- 23 The provisions require 20% of the net site area adjacent to road corridors to contain tree cover. Accommodating tree cover typically necessitates wider road corridors. Wider road corridors reduces land available for housing, in direct conflict with the existing District Plan provisions stipulating a minimum density of 15 hh/ha must be achieved for greenfield subdivision areas, and more generally the NPS-UD.
- 24 The cost implications of not achieving tree cover are considerable and, given Daresbury Limited does not consider the 20% cover is achievable, will add further to development costs that are then passed onto purchasers.

- 25 The implications of this proposed policy are significant from an economic perspective and must be adequately justified by the Council. As it stands, Daresbury Limited do not consider the Council has done this and therefore the proposed financial contributions policy should be deleted in its entirety.

Signed for and on behalf of Daresbury Limited by its solicitors and authorised agents
Chapman Tripp



Jo Appleyard
Partner
12 May 2023

Address for service of submitter:

Daresbury Limited
c/- Jo Appleyard / Lucy Forrester
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Level 5, PwC Centre
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Email address: Jo.Appleyard@chapmantripp.com / Lucy.Forrester@chapmantripp.com

APPENDIX 1

No.	Provision	Position	Submission	Relief Sought
1	Definition of 'Alteration'	Oppose	The definition has the effect of meaning that any change, modification or addition to a heritage item, heritage setting or heritage fabric, or a building in a heritage area will constitute an 'alteration' and trigger corresponding rules and consent requirements, irrespective of whether it impacts on heritage fabric. This will create unnecessary, costly and inefficient consent requirements, and provide no benefits in respective of heritage.	Retain status quo.
2	Definition of 'Demolition'	Oppose	The amended definition has the effect of meaning that any destruction of a non-substantial part of a building constitutes 'demolition' and triggers corresponding rules and consent requirements. This will create unnecessary, costly and inefficient consent requirements for inconsequential partial demolition work, create conflict with the definition of 'alteration', and provide no benefits in respective of heritage.	Retain status quo.
3	Definition of 'Heritage setting'	Oppose	The amended definition removes the wording that a setting <i>'together with the associated heritage item, has met the significance threshold'</i> and instead states that <i>'Heritage settings have not been assessed as meeting the significance threshold for scheduling'</i> . The submitter considers that heritage settings that	Retain status quo.

			do not meet the significance threshold for scheduling should not be listed, with associated regulatory requirements.	
4	Definition of 'Heritage Building Code works'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for insulation and glazing upgrades.	Retain as proposed.
5	Definition of 'Reconstruction'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for additional forms of reconstruction.	Retain as proposed.
6	Definition of 'Relocation'	Oppose	The submitter opposes the deletion of the exclusions in (a) and (b) that otherwise sensibly exclude temporary relocation or realignment works.	Retain status quo.
7	Definition of 'Repairs'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for additional forms of repairs.	Retain as proposed.
8	Definition of 'Restoration'	Supports	The amended definition provides greater clarity and certainty.	Retain as proposed.
9	8.9 Rules-Earthworks	Support	The amended provisions in rule 8.9 are generally appropriate.	Retain as proposed.
10	Policy 9.3.2.2.3 - Management of scheduled	Oppose	The amendments to clause (a)(ii) of this policy are opposed. This change inappropriately shifts the focus of the plan away from providing for ongoing use and adaptive re-use of heritage items, towards more rigid	Retain status quo.

	historic heritage		<p>preservation and protection. This can have the perverse outcome of preventing the retention of heritage buildings by preventing owners (particularly private owners) from using and maintaining heritage items in ways that are practical and financially feasible.</p> <p>The amendments to clause (b)(i) of this policy are also opposed. The operative wording within this policy sensibly recognises that Significant (Group 2) heritage items are potentially capable of accommodating a greater degree of change than Highly Significant (Group 1) heritage items.</p>	
11	Policy 9.3.2.2.8- Demolition of scheduled historic heritage	Oppose	<p>The changes to clause (a)(ii) are opposed insofar that they introduce a new 'test' for evaluating the demolition of historic heritage that presents an unreasonable and inappropriate threshold that materially changes and undermines the policy. By way of example, the proposed wording may preclude the demolition of heritage items that are significantly (physically) compromised, on the basis of one or more (non-physical) heritage values (e.g. historical/social or cultural/spiritual value) remaining.</p>	Retain status quo.
12	Rule 9.3.4.1.1 (P9/8) Permitted activities	Oppose	<p>The deletion of P9 is opposed. There are many heritage buildings in Christchurch which are still in a state of disrepair and are significantly damaged as a result of the Canterbury earthquakes. It is premature to</p>	Retain status quo.

			remove these rules and standards, which sensibly provide specific guidance for heritage buildings that have been earthquake-damaged.	
13	Matters of discretion 9.3.6.1(a)	Oppose	<p>The submitter opposes the deletion of clause (a), given that damage incurred as a result of the Canterbury earthquakes of 2010 and 2011 including the costs of repair and reconstruction, remains a relevant matter for consideration.</p> <p>There are many heritage buildings in Christchurch which are still in a state of disrepair and are significantly damaged as a result of the Canterbury earthquakes. It is premature to remove these rules and standards, which sensibly provide specific guidance for heritage buildings that have been earthquake-damaged.</p>	Retain status quo for 9.3.6.1(a).
14	Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items	Oppose	For the reasons stated in the covering submission, the listing of Daresbury House (heritage item 185) and associated setting (heritage setting 602) is inappropriate. Accordingly, this listing should be deleted.	Delete Heritage Item 185 and Heritage Setting 602 regarding Daresbury House from Appendix 9.3.7.2.
15	Appendix 9.3.7.4 Heritage item and heritage	Oppose	The exemptions provided in Appendix 9.3.7.4 are an important tool for incentivising the adaptive reuse and ongoing protection of heritage items. As such, the amendments	Retain the status quo.

	setting exemptions		proposed to this appendix which reduce the extent of exemptions is inconsistent with the Plan's objectives in relation to heritage and section 6 of the Act.	
16	Objective 3.3.10(ii)(E)	Oppose	<p>Consistent with its submissions on sub chapter 6.10A, the submitter considers the provisions relating to tree canopy cover and financial contributions in their entirety are unworkable and onerous.</p> <p>The submitter further notes, that if the Council are wanting to enhance and grow the City's biodiversity and amenity this should also go hand in hand with Council agreeing to accept larger and more frequent recreational reserve areas. Over the past 5 – 7 years Council have pushed back against numerous developer proposals to increase reserve areas which would assist in meeting these proposed objectives.</p>	Delete.
17	General/all Sub Chapter 6.10A Tree Canopy Cover and Financial Contributions	Oppose	The provisions in their entirety concerning tree canopy cover and financial contributions (including related definitions and amendments to strategic objectives) are unworkable and onerous.	Delete all of the financial contributions draft provisions in their entirety.
18	6.10A.1	Oppose	The provision begs the question: If trees are retained over and above the 20% cover	

			threshold will a financial credit be provided to the applicant?	
19	6.10A.1c	Oppose	<p>Greenfield subdivision does not generally cause the loss of tree canopy cover, there is generally a net gain in canopy cover as such subdivision is typically over open paddocks.</p> <p>Furthermore, Council itself has been responsible for a reduced canopy cover through the adoption of policies of density, road widths, off-sets from infrastructure, reduction in reserves to vest, all based around maintenance obligations and council budgets.</p>	
20	6.10A.1d	Oppose	<p>There is currently no "Urban Forest Plan" setting out the Council target. Therefore, how is anyone expected to know if this is even realistic?</p> <p>This section also refers to financial contributions to cover the cost of tree pits construction within road corridors. This should exclude Greenfield sites where developers are already required as part of their subdivision consent to include street trees within new road corridors.</p>	
21	Objective 6.10A.2.1	Oppose	<p>For the reasons expressed in the submission points above, the objective is generally opposed.</p> <p>Otherwise, the objective fails to account for the particular characteristics of residential activity, its location or other contextual matters that</p>	

			may make this objective unachievable or inappropriate. For example, residential activities within multi-level apartment buildings in the core of the Central City could not practicably '[maintain] <i>existing trees and/or</i> [plant] <i>new trees as part of the development</i> ', as required by the objective.	
22	Policy 6.10A.2.1.1	Oppose	For the same reasons expressed in regards Objective 6.10A.2.1 and otherwise noting the practical difficulties of monitoring and enforcing the tree canopy percentages over time, this policy is opposed.	
23	Policy 6.10A.2.1.2	Oppose	For the same reasons expressed in regards to the submission points above, the policy is opposed. Among other things, the maintenance of required tree canopy is impractical to monitor and enforce and requiring financial contributions from those who do not meet the requirements but not from those who may provide the canopy and subsequently remove it. This policy is inequitable and unworkable.	
24	Policy 6.10A.2.1.3	Oppose	The requirements for tree planting (in terms of location, soil volume, etc) are unnecessarily and unreasonably prescriptive and remove property owners' reasonable freedom and choice to landscape their properties as they choose. Moreover, such requirements are difficult to monitor and enforce on an ongoing basis (e.g. as new owners or tenants choose to	

			<p>re-landscape) and are unnecessary accounting for the control or discretion in regards to these matters where trees are expressly required through resource consent processes.</p> <p>Consent notices in respect of tree planting are an unreasonable and onerous requirement, and are considered impracticable for enforcing residential landscaping which is commonly and regularly altered to reflect changing needs and preferences over time. Consent notices are likely to be overlooked or ignored, or impose costly and inefficient regulatory processes to retrospectively address landscaping works in breach of consent notices.</p> <p>Policies relating to trees in road reserve are unnecessary, noting that such trees can be adequately managed by Council in its capacity as road controlling authority.</p>	
25	6.10A.3	Oppose	<p>The provisions in this section are generally opposed. Further, clause (c) is considered unclear, insofar as providing 'guidance' on tree species and other 'requirements' and whether these external documents will essentially be imposed as rules.</p>	
26	6.10A.4	Oppose	<p>The rules are opposed in their entirety for the reasons expressed above.</p>	
27	6.10A.4(a)	Oppose	<p>The explanatory note setting out the application of the rules is arbitrary, unclear and open to interpretation. Among other concerns,</p>	

			it requires a judgement of whether subdivision or development is 'able to contain a ground floor residential unit' irrespective of whether that is proposed, commercially viable, or otherwise.	
28	6.10.A.4.1	Oppose	<p>The rules are opposed in their entirety for the reasons expressed above and noting they are arbitrary, unclear and open to interpretation.</p> <p>Among other concerns, the rules apply to 'any residential development except for extensions or accessory buildings...', which might capture non-built improvements (as residential development), such as hard or soft landscaping works, internal alterations, first floor additions, etc.</p>	
29	6.10.A.4.2	Oppose	<p>The rules are opposed in their entirety for the reasons expressed above and noting they are arbitrary, unclear and open to interpretation and debate. Aside from the monetary costs imposed by the rule, the administration of the rule imposes significant costs insofar as it requires an independent registered valuation.</p> <p>The rules are clearly in conflict with strategic objective 3.3.2.</p>	
30	6.10.A.4.2.3	Oppose	Consent notices in respect of tree planting are an unreasonable and onerous requirement, and are considered impracticable for enforcing residential landscaping which is commonly and regularly altered to reflect changing needs and	

			preferences over time. Consent notices are likely to be overlooked or ignored, or impose costly and inefficient regulatory processes to retrospectively address landscaping works in breach of consent notices.	
31	Rule 8.3.3 (b) financial contributions	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete.
32	General / all - Sub Chapter 9.4 Significant and Other Trees Including: 9.4.1 (c) Introduction; Policy 9.4.2.2.3 Tree Protection; 9.4.3(a) & (f) how to interpret and apply the rules; and 9.4.4. Rules	Oppose	The submitter opposes the identification of selected scheduled trees as qualifying matters. The operative provisions relating to scheduled trees provide sufficient protection for such trees (including development buffers) and the presence of trees need not preclude more intensive forms of development.	Delete.

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Philippa


Last name:

Rutledge

Preferred method of contact

Email

Attached Documents

Name	
R Rutledge Submission Email	

Jackson, Andrew

From: Philippa Rutledge <pnrutledge2002@hotmail.com>
Sent: Friday, 12 May 2023 3:24 pm
To: Engagement
Subject: Housing and Business Choice Plan Change 14 - personal submission

Required Information:

Name: Philippa N Rutledge

Address: 44A Wairarapa Terrace, Merivale ,Christchurch 8014

I could not gain an advantage in trade competition through this submission and I would wish to be heard in support of it.

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

Qualifying matters:

Support

Sunlight Access as being a qualifying matter - based on recession planes providing Christchurch residents with equivalent solar heating as those in Auckland rather than merely sunlight hours a section 5 RMA health and well being matter;

Addition of Stormwater Infrastructure capacity as a qualifying matter for the MRZ – a section 5, 6(a) and 77I(a) matter.

My submission is that:

Re Sunlight Access - the Council's proposal seeks to achieve 'an equitable outcome of MDRS standards in a Christchurch context.' by providing equivalent sunlight access. that means that for 3 months of the year groundfloor apartments/single story dwellings will be without any sunlight.

However Christchurch is a much colder city in winter so loss of sunlight during the coldest months will have a much higher impact on heating costs than it does in Auckland. Further Christchurch is a largely flat city meaning shading is predominantly determined by building height and proximity. Finally single storey/groundfloor apartments are more likely to be occupied by those who have mobility issues.

These people are the least likely to be able to afford the additional heating costs imposed by the loss of sunlight for the coldest 3 months of the year.

To achieve the 'equitable outcome of MDRS standards in a Christchurch context' in the context of ground floor residents need more sunlight to achieve equivalent solar heating benefits in a colder climate. Sunlight access recession planes need to be based on providing equivalent solar energy to ground floor dwellings in Christchurch (Climate zone 5) as in Auckland (climate zone 1) as per Technical Report – Residential Recession Planes in Christchurch.

Stormwater Infrastructure – the Consultation document acknowledges the limitation on growth imposed by old infrastructure -including stormwater. Existing rainfall is increasing in intensity making stormwater management more vital than ever. The post-quake rebuild has resulted in considerable intensification of housing in existing city residential neighbourhoods. Large sections have been subdivided and smaller sections have had rebuilds which cover much more of the section. In both cases permeable gardens and vegetation have disappeared to be replaced by larger structures and impermeable patios, driveways. This results in much higher stormwater runoff. To the streets and then streams, creeks. Unlike the new areas that have been developed there has been no upgrade of the

older stormwater infrastructure in areas like mine to cope. Further streams which are used to discharge stormwater into - such as the Wairarapa - had their beds raised by liquefaction reducing their capacity to absorb stormwater flows. Resulting in the gutters overflowing quickly, and the stream rising fast. On 11 May 2023 18mm fell in the city over an 8 hour period. This is not intense nor prolonged rainfall. Nevertheless the Wairarapa Stream was at the top of the lowest bank by 10 am and there was numerous street flooding from overflowing street culverts in many parts of the city. In some places over half the road.

If the existing stormwater drains have a designation under 77I(g) - this would assist the Council to give effect to the designation by ensuring adequate capacity and maintenance for houses connecting to the SW drain. It is also a 77I(a) [s6(a) matter] - natural character of water includes water quality and quantity, and stormwater discharges carry contaminants and alter natural flow.

Intensified development which results in increased stormwater discharge in areas of the MRZ where the stormwater infrastructure has not been upgraded within the last 20 years should be a qualifying matter. The NPS-UD 3.5 requires that local authorities must be satisfied that infrastructure to service the development is available. Where this infrastructure is over 20 years old this is clearly not the case. Climate change will make the adequacy of stormwater infrastructure even more important.

I seek the following decision from the Council:

The Sunlight Access recession planes be designed to ensure Christchurch residents living in climate zone 5, during the winter months receive equivalent solar energy to those living in climate zone 1.

In MRZ qualifying matters – include stormwater infrastructure that has not been upgraded within the last 20 years.

The plan change is subject to Part 2 in the usual way, and as such the health and well-being of people in s5 should not be diminished as a result of stormwater discharges or loss of sunlight access.

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council





Submitter Details

Submission Date: 12/05/2023

First name: Alan and Robyn **Last name:** Ogle

Preferred method of contact Email

Attached Documents

Name	
Email from A and R Ogle	
SUBMISSION ON PROPOSED HOUSING AND BUSINESS CHOICE PLAN CHANGE A R Ogle 12May23	

Jackson, Andrew

From: Alan Ogle <alan.ogle@gmail.com>
Sent: Friday, 12 May 2023 2:41 pm
To: Engagement
Subject: Proposed Plan Change 14 Housing and Business Choice: Submission from A & R Ogle
Attachments: SUBMISSION ON PROPOSED HOUSING AND BUSINESS CHOICE PLAN CHANGE A & R Ogle 12May23.docx

Attention Engagement Team

Apologies, but the attachment to the email sent below was poorly formatted and difficult to print.

I would be grateful if could remove the earlier attachment from your records and replace it with the updated submission attached to this email.

Many thanks

Alan & Robyn Ogle

Attention Engagement Team

I have tried submitting this document via your website for the last hour, but have struck problems each time I try to add an attachment!

As advised by phone, please find attached our (my wife & I) submission.

Should there be any issues regarding the format or eligibility of the submission, please come back to as soon as possible.

Kind regards

Alan Ogle

--

Alan Ogle
 Email: alan@ogle.nz
 Ph 03 3482795 or 021454046

SUBMISSION ON PROPOSED HOUSING AND BUSINESS CHOICE PLAN CHANGE (PC14)

Submitter Details

First names: Alan & Robyn Last name: Ogle

Preferred method of contact: Email

Postal Address: 43 Matai Street

Suburb: Riccarton

Country: New Zealand

Post Code: 8011

Email alan@ogle.nz>

Daytime Phone: 021 454 046

Ages: 76 & 72

Gender: M, F

Ethnicity: NZ European

We could not gain an advantage in trade competition through this submission.

We are not directly affected by an effect of the subject matter of the submission that:

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

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

No - I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

We seek Amendments and the following decisions from the Council in the following areas as identified by the Submissions from The Riccarton Bush Kilmarnock Residents' Association dated 2 May2023.

(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.
2. 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.

Our additional submission is that:

After attending recent meetings of the Riccarton Bush Kilmarnock Residents' Association, we now fully support their 36 page submission dated 2 May 2023. In addition, as residents in Matai Street West we particularly support matters raised on pages 21 to 24 concerning Matai Street West and the need for re-evaluating walking distances and 6 story zones. We particularly hold deep further concerns on the following:

1. PC 14 fails to recognise that since its conversion to a key cycleway to the north and west of the City, the low-rise character, emerging tree lined environment, safety and historical significance should be protected.
2. The RMDS takes no account of the detrimental safety effects of increased shade and frost upon the cycleways and footpaths, and their major use by school children and an aging population in the area.
3. Overall the rules for recession planes in the RMDS are not formulated taking into account our latitude difference, shorter daylight hours, cooler temperatures, inversion layer/frosting and greater need to preserve sunlight.
4. The storm water and sewerage connections, although upgraded approximately 15 years ago, are inadequate, with flooding and sewage malfunctions during rain events above 30mm in any 8 hour period. The railway line at the eastern end of Matai Street West forms a bund that inhibits storm water flows. Intensification will only exacerbate these issues.

Alan & Robyn Ogle
12 May 2023

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Ed

Last name:


Leeston

Organisation:

Otautahi Community Housing Trust

Preferred method of contact

Attached Documents

Name	
OCHT Submission on pc14	

12 May 2023

Attn: Mark Stevenson
Planning Manager
Christchurch City Council
Po Box 73016
Christchurch

Submission lodged via email: engagement@ccc.govt.nz

**ŌTAUTAHU COMMUNITY HOUSING TRUST SUBMISSION ON A NOTIFIED PROPOSAL FOR PLAN
CHANGE 14 UNDER CLAUSE 6 OF SCHEDULE 1 OF THE RESOURCE MANAGEMENT ACT 1991**

Ōtautahi Community Housing Trust (“**OCHT**”), at the address for service set out below, thanks Christchurch City Council for the opportunity to submit on the notified proposal for Plan Change 14 “**PC14**”). This letter provides the substantive detail of OCHT’s submission on PC14.

Background

1. OCHT was established by the Christchurch City Council in 2016 to manage Council-owned social housing as well as social housing owned by the Trust. This application represents the Trust’s objectives to improve the quality and increase the supply of community housing in Christchurch.
2. OCHT is the largest non-governmental social housing provider in the South Island. It is a registered charity and a community housing provider. Christchurch City Council successfully passed on a social housing portfolio of approximately 2,300 properties and tenants to OCHT in October 2016.
3. As a Social Landlord, “OCHT’s focus is on tenant-centric service delivery, sustainable tenancies and improved property management services”.
4. OCHT deliver a minimum of 50 new social housing units per year in Christchurch and Banks Peninsula.
5. The proposed homes meet the OCHT goal of providing warm, dry and healthy homes and have been designed to the New Zealand Green Building Council’s Homestar 6 standard.

Submission on PC14

6. Because of OCHT’s role as a Social Landlord and property developer, they have an interest in enabling quality urban developments through increasing the availability of build-ready land across the Canterbury Region, including Christchurch City. OCHT therefore has an interest in PC14 and how it:
 - i. Gives effect to the National Policy Statement on Urban Development (“**NPS-UD**”) and The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (“**the Housing Supply Act**”);

- ii. Minimises barriers that constrain the ability to deliver housing development across the housing continuum; and
 - iii. Provides for the provision of services and infrastructure and how this may impact on the existing and planned OCHT housing developments.
7. OCHT supports the general direction and intent of PC14, especially to the extent that this suite of plan changes is more enabling of residential and business development capacity compared to the Christchurch City Council Operative District Plan.

In particular, OCHT supports:

- i. The recognition of the need for well-functioning urban environments (consistent with the direction set out in the National Policy Statement on Urban Development 2020 (“**NPS-UD**”));
 - ii. The provision of medium density housing in most existing residential areas across the city, which is consistent with the requirements of the Resource Management (Enabling Housing Supply) Amendment Act 2021 (“the Amendment Act”);
 - iii. The recognition of the need to provide sufficient development capacity to meet long term demands for housing and business land;
 - iv. The need to manage such intensification where it is located in areas exposed to a high risk of natural hazards;
 - v. The promotion of a compact urban form and residential intensification in Christchurch City;
 - vi. The provision for enabling medium to high density residential development within a walkable catchment of the City Centre and larger Commercial Centres; and
 - vii. The provision of a range of commercial and mixed-use environments which will provide for and support urban development across Christchurch City.
1. The OCHT submission seeks amendments to PC14 in the following topic areas:
- i. OCHT generally support the qualifying matters, subject to amendments and clarifications as proposed with the exception of: Low Public Transport Accessibility, Key Transport Corridors, Residential Heritage Areas, new Character Areas, which are opposed by OCHT for the reasons included in **Appendix 1**.
 - ii. OCHT considers that qualifying matters need to be expressed more clearly across PC13 and PC14 to assist with plan administration and interpretation.
 - iii. OCHT supports the application of MRZ across all relevant residential zones. It also supports the introduction of HRZ around the edge of the City Centre and where located in close proximity to larger commercial centres.
 - iv. OCHT submits that changes to policies, rules and matters of discretion are necessary to better reflect the requirements and intent of the ‘the Housing Supply Act’ and NPS-UD. OCHT considers that PC14 is not currently appropriately framed to recognise that as the character of planned urban areas evolves to deliver a more intensive and compact urban form, amenity values will change. Amendments are sought to ensure this is reflected

more consistently throughout the provisions, in language that is consistent with the NPS-UD.

- v. OCHT submission seeks changes to rules to address errors, to align with Schedule 3A of the Housing Supply Act, or to reduce duplication where the standards introduced via Schedule 3A overlap with District Plan provisions that are not proposed to be deleted.
 - vi. OCHT submission seeks more concise/ succinct matters of discretion that are easily understood, clearly state the outcomes intended, and provide for design innovation and choice. The scope and extent of these assessment matters provide such broad discretion that they undermine the 'Housing Supply Act's' intent of a restricted discretionary activity status. Accordingly, OCHT seeks that these assessment matters are consolidated and simplified.
 - vii. OCHT supports nationally consistent matters of discretion for MDRS standards, whilst allowing for some evidence based local context nuances. OCHT supports the use of consistent 'Urban Design Principle' matters of discretion in District Plans throughout the country.
 - viii. The submission seeks such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission above and in **Appendix 1**.
2. The changes requested are made to:
- i. Ensure that OCHT can carry out its obligations as a charity and community housing provider;
 - ii. Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991;
 - iii. Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development; and
 - iv. Provide clarity for all plan users.
3. The submission points and changes sought to PC14 can be found within Table 1 of **Appendix 1** which forms the bulk of the submission.

UCHT seeks the following decision from Christchurch City Council:

That the specific amendments, additions or retentions which are sought as specifically outlined in **Appendix 1**, shown in red and are struck through or blue and underlined, are accepted and adopted into the insert abbreviated plan change/proposed plan name, including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

UCHT wishes to be heard in support of their submission.

UCHT seeks to work collaboratively with the Council and wishes to discuss its submission on PC14 to address the matters raised in its submission.

Dated 12/05/2023



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.....

Ed Leeson

General Manager Property and Development

National Planning, Urban Design and Planning Group

Ōtautahi Community Housing Trust

ADDRESS FOR SERVICE:

Ōtautahi Community Housing Trust

*PO Box 53 Christchurch 8013**Email: ed.leeson@ocht.org.nz*

Appendix 1:

Decisions sought on PC14

Table 1

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
Zone Boundaries/ Mapping					
1.		Planning maps	Support in Part	<p>OCHT support the implementation of a MRZ over all relevant residential zones. As set out in this submission, OCHT oppose the Public Transport Accessibility QM and therefore seek as a consequence of deleting this QM that the RS and RSDT zoned areas within this QM be rezoned to MRZ.</p> <p>OCHT note some ambiguity in the provisions as to whether the land that is subject to the Tsunami Risk QM is intended to be zoned MRZ or RS/ RSDT. Whilst agreeing that a high risk of natural hazards is a legitimate QM, our submission raises concerns with whether the costs and benefits of this QM strike an appropriate balance, and question the</p>	<p>Retain MRZ over areas where MRZ is proposed in PC14 as notified.</p> <p>Rezone to MRZ areas that are proposed as RS/ RSDT zones under the Public Transport Accessibility QM.</p> <p>Retain HRZ over areas where HRZ is proposed in PC14 as notified.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>appropriateness of using a threshold of a 1:500 year event plus a 1m rise in sea levels as the mapping base. Use of a lower density RS/ RSDT zoning should only be used where the risk of hazards is proven to be high and with a high return period.</p> <p>OCHT support the inclusion of a High Density Residential Zone in appropriate locations close to the City Centre and larger suburban commercial centres.</p>	
Chapter 6 – Qualifying Matters					
2.	Tsunami Management Area	<p>5.2.2.5.1 Managing development in.</p> <p>5.2.2.5.2 Managing development within the Qualifying Matter</p>	Support in Part	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or</p>	Amend the provisions to remove / delete the mapped Hazard Management Areas from within the District Plan. Instead, these natural hazard overlays should be based on non-statutory map layers in the City Council's Interactive Viewer that sits outside the

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>Tsunami Management Area</p> <p>5.4A.1 – 5.4A.6 Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area</p>		<p>intensification enabled under Policy 3.</p> <p>OCHT also has concerns that the proposed policy approach is too conservative, noting that Policy 24 of the NZCPS requires identification of areas in the coastal environment that are potentially affected by coastal hazards (including tsunami) over at least 100 years. Similarly, Policy 25 of the NZCPS directs that councils avoid increasing the risk of social, environmental, and economic harm from coastal hazards, in areas potentially affected by coastal hazards over at least the next 100 years. The conservative nature of the policy approach has implications for both the geographic extent of the hazard overlays and Qualifying Matters, and the costs and benefits of the proposed regulation and associated significant limitations on</p>	<p>District Plan. Not included in the Proposed Plan and Variation.</p> <p>Reduce the Tsunami Management Area to a 1:100 year hazard.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>redevelopment potential of large areas of existing commercial and residential building stock.</p> <p>OCHT also considers that the Council's intent to retain Residential Suburban / Residential Suburban Density Transition zoning in the Tsunami Management Area is disproportionate based on the modelled return period. This may be appropriate for 1:100 or 1:200, especially if such areas are also covered by high flood and/or coastal inundation risk overlays.</p> <p>This also appears to be a disconnect between arms of council actively promoting residential intensification on Council owned land in New Brighton, suggesting the absence of a coherent approach to place-making and rules that will significantly limit</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				regeneration in areas that are in need of rebuilding.	
3.	Historic Heritage, Residential Heritage Areas, and Residential Heritage Area Interface.	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.3.2.3 Building height - Residential Heritage Areas.</p> <p>14.5.3.2.7 Number of Residential Units Per Site - Residential Heritage Areas.</p>	<p>Support Historic Heritage.</p> <p>Oppose Residential Heritage Areas.</p>	<p>OCHT support the management of Historic Heritage and the use of qualifying matters for individually listed heritage items, noting that it is a matter of national significance in Section 6.</p> <p>OCHT does not oppose the Heritage Areas as a qualifying matter where there is a strong evidence basis. It does however oppose the proposed Residential Heritage Areas being a qualifying matter as we consider Council has sought to elevate (conflate) special character as historic heritage.</p> <p>Further, it is considered that the s32 assessments for the Residential Heritage Areas lack a strong evidence basis and</p>	Delete the Residential Heritage Area qualifying matter and any proposed provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>14.5.3.2.8b, 8c Setbacks - Residential Heritage Areas.</p> <p>14.5.3.2.9 Building Coverage - Residential Heritage Areas.</p> <p>14.5.3.2.10c Outdoor living space - Residential Heritage Areas.</p>		<p>fail to take into account un-implemented resource consents.</p> <p>OCHT considers that a more nuanced assessment of costs and benefits applies to areas with a high proportion of OCHT housing</p> <p>A more nuanced assessment of costs and benefits is likewise required for heritage areas in locations that are otherwise ideally located for further intensification, such as the heritage areas within and adjacent to the central city/ Four Avenues.</p> <p>The imposition (costs) of heritage controls in locations that would otherwise suit high density housing must therefore be greater than the costs applying to character and heritage areas more generally. It follows that the benefits of such regulation and</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>the identification of these areas as Qualifying Matters must therefore be greater than the benefits generally in order to justify additional regulation.</p> <p>OCHT also oppose the proposed provisions controlling new buildings on sites sharing a boundary with a Residential Heritage Area (Residential Heritage Area Interface). The introduction of this interface as a QM further blurs the distinction between s.6 matters. These controls are similarly not a universally accepted approach to the management and protection of heritage values, and OCHT does not support this use.</p> <p>These properties will be subject to a restricted discretionary activity consent, and in many cases are in locations that are otherwise ideally located for further</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>intensification. The reasons OCHT have for opposing this reflect the matters outlined above for Residential Heritage Areas more generally.</p> <p>It is further noted that having some of the Heritage Area provisions being contained in PC14 and following an IPI process i.e. the built form standards, and other Heritage Area provisions being progressed through a separate PC13, and following a first schedule process i.e. Heritage Area policies has created efficiency issues. The OCHT submission on Heritage Areas as part of PC14 therefore needs to be read together with our separate submission on PC13.</p>	
4.	Significant and Other Trees (excluding those not identified as	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions	Support in Part	OCHT support the Significant and Other Trees qualifying matter.	Retail Significant and Other Tree Qualifying Matter. Amend Rule 9.4.4.1.1 P12 as follows:

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	Qualifying Matters).	<p>that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>9.4.4.1.1 P1 – P12 Tree pruning, felling, earthworks.</p> <p>9.4.4.1.2 C1 Tree maintenance.</p> <p>9.4.4.1.3 RD1 – RD8 Tree pruning, felling, earthworks.</p> <p>9.4.4.1.4 D1 – D2 Tree pruning, felling</p> <p>9.4.7.1 Appendix – Schedules of significant trees.</p>		<p>The rules in Chapter 9 of the District Plan sufficiently recognise and provide for the management of notable trees. Such rules provide a suitable framework for considering new buildings in proximity to notable trees, or their removal.</p> <p>Rule 9.4.4.1.1 P12 triggers the need for resource consent for earthworks within 5m of a street tree, however consent is always granted provided the works are undertaken by, or under the supervision of, a works arborist. The relief sought would reduce costs and the reliance on the resource consent process and is therefore more consistent with Objective 3.3.2.</p>	<p>Rule 9.4.4.1.1 P12 - Activities shall be undertaken by, or under the supervision of, a works arborist.</p> <p>employed or contracted by the Council or a network utility operator.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
5.	Residential Character Areas	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.3.1.1 P4 Conversion to two residential units – Character Area Overlays</p> <p>14.5.3.1.2 C1 Character Area Overlays – new residential units to rear</p> <p>14.5.3.1.3, RD6, RD14 Area-specific rules</p>	Oppose in Part	<p>OCHT support, in principle, the management of character as a qualifying matter. However, OCHT does not consider appropriate justification has been provided for the proposed new or extended ‘character areas’ set out in PC13 and PC14 to demonstrate that they contain specific characteristics that make the level of development provided by the MDRS or policy 3 inappropriate in the area. Further, they blur the line between the protection of historic heritage values as set out under s6(f) of the RMA, and amenity values as set out under section 7 of the RMA. This is especially the case where both character and heritage area overlays apply to the same geographic area.</p> <p>OCHT is opposed to the use of character areas which reduce density below the level</p>	<p>Delete all new or extended character areas as qualifying matters.</p> <p>For existing character areas retain the controlled activity status for new buildings that exists in the Operative Plan - Rule 14.5.3.1.2 C1.</p> <p>Delete all new built form standards for character areas.</p> <p>14.5.3.2.3 Building height – Character Area Overlays, and</p> <p>14.5.3.2.5 – 14.5.3.2.14 Built form rules – Character Area Overlays.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>and character overlays.</p> <p>14.5.3.2.3 Building height – Character Area Overlays.</p> <p>14.5.3.2.5 – 14.5.3.2.14 Built form rules – Character Area Overlays.</p> <p>14.15.27 Matters of discretion - Character Area Overlays.</p>		<p>provided by the underlying zone (MDRS) or that seek to control the demolition or alteration of buildings, unless these buildings individually qualify as historic heritage.</p> <p>OCHT considers that if the District Plan is going to apply restrictions on the demolition of buildings and the development of new buildings on these sites, then these buildings should be individually identified as meeting a historic heritage significance threshold through appropriate assessments and protected through the Historic Heritage chapter of the Proposed District Plan.</p> <p>OCHT further considers that a more nuanced assessment of costs and benefits applies to areas with a high proportion of OCHT housing, i.e. the benefits of providing a greater number of houses for the most</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>vulnerable members of society are greater than retaining the character associated with existing housing per se, particularly when much of the character is linked to the association with historic social housing, and therefore the character or heritage benefits of such locations must be even greater to outweigh the social costs.</p> <p>A more nuanced assessment of costs and benefits is likewise required for character and heritage areas in locations that are otherwise ideally located for further intensification.</p> <p>The imposition (costs) of heritage and character controls in locations that would otherwise suit high density housing must therefore be greater than the costs applying to character and heritage areas more</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				generally. It follows that the benefits of such regulation and the identification of these areas as Qualifying Matters must therefore be greater than the benefits generally in order to justify additional regulation.	
6.	Low Public Transport Accessibility.	14.1 Introduction, 14.2 Objectives and Policies, 14.3 How to interpret and apply the rules, 14.4 Rules - Residential Suburban Zone and Residential Suburban Density Transition Zone, 14.7 Rules - Residential Hills Zone, 14.8 Rules - Residential Banks Peninsula Zone, 14.15 Rules - Matters of control and discretion, 14.16 Rules - Appendices – all as they apply to areas that are zoned	Oppose	<p>OCHT opposes the 'Low Public Transport Accessibility' being a qualifying matter as the s32 assessment lacks a strong evidence basis, especially given the geographic extent (costs) of the qualifying matter.</p> <p>This qualifying matter is opposed because whilst access to public transport is beneficial, it is not so critical as to make the application of MDRS invalid.</p> <p>The provision of improved access to public transport is a matter that is capable of resolution through increased</p>	<p>Delete the Low Public Transport Accessibility Qualifying Matter and all associated provisions.</p> <p>Rezone all areas subject to this QM to MRZ (unless there is another QM in play that would prevent rezoning)</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		Residential Suburban or Residential Hills, or in Lyttelton zoned Residential Banks Peninsula.		<p>funding and/or innovation in how public transport is provided into the future. The qualifying matter means that if improved services are provided to an area, a full First Schedule process will need to be followed to amend the zoning.</p> <p>MDRS enables increased population, which will in turn support improved public transport services. Conversely the lack of potential increase in population (through restricted zoning) could be used as a justification for not improving services. In short, there is a clear 'chicken and egg' situation with service provision.</p> <p>OCHT is particularly concerned to note the large areas with inadequate services in the eastern parts of the District, where the lack of such services has the potential to</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				exacerbate existing social inequalities.	
7.	Key Transport Corridors – City Spine	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.2.18 – Spine Road setbacks.</p> <p>14.6.2.17 - Spine road setbacks.</p> <p>15.4.2.10 – spine corridor setbacks.</p> <p>15.5.2.10 Setback from corridor.</p>	Oppose	<p>OCHT oppose the ‘City Spine’ being a qualifying matter as the s32 assessment lacks a strong evidence based for the scale of setback as a qualifying matter.</p> <p>The roads covered by this matter are not State Highways and therefore are not considered ‘nationally significant infrastructure’.</p> <p>The associated rules require buildings and outdoor living spaces to be set back from spine road corridors in both residential and commercial zones. In commercial zones there is a direct conflict in urban design outcomes (and rules) where the Key Pedestrian Frontage rules require buildings to be built up to the road boundary in order</p>	Delete the Key Transport Corridors – City Spine Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>15.6.2.11 Setback from corridor.</p> <p>15.8.2.13 Setback from corridor.</p> <p>15.10.2.10 Setback from corridor.</p> <p>15.12.2.13 Setback from corridor.</p> <p>15.14.5.3 Matters of Discretion.</p>		<p>to deliver good urban design outcomes and facilitates a continuous street edge (often with veranda cover for pedestrians). The proposed spine corridor QM is directly counter to the delivery of good quality 'main street' retail environments.</p> <p>It is understood that the intention of the rule is to enable road widening in the future to accommodate public rapid transit. If Council's intention is to acquire land in the future to facilitate public works then it should use the designation powers available to it.</p> <p>Given the highly developed nature of these existing corridors with lengthy sections of commercial property built to the road boundary, it is unclear how any corridor-long road widening will occur</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				without major land acquisition and demolition.	
Chapter 5 – Natural Hazards					
8.	5.5	Policy 5.2.2.5.2 - Managing development within Qualifying Matter Tsunami Management Area	Support in Part	<p>OCHT considers that the Council's intent to retain Residential Suburban / Residential Suburban Density Transition zoning in the Tsunami Management Area is disproportionate based on the modelled return period. This may be appropriate for 1:100 or 1:200, especially if such areas are also covered by high flood and/or coastal inundation risk overlays.</p> <p>OCHT seeks changes to the wording of Policy 5.2.2.5.2 to provide certainty of the outcomes intended, noting that the rule allows for up to four residential units to be constructed on these sites (Rule 14.4.1.1 P4, P5 and P6)</p>	<p>Amend Policy 5.2.2.5.2 as follows:</p> <p>Within the Tsunami Management Area Qualifying Matter, avoid discourage development, subdivision and land use that would provide for intensification of any site, unless the risk to life and property is acceptable.</p> <p>Alternatively the Policy framework could be retained if the geographic extent of the QM matter is better aligned with a 1:100 return period or covers an area reflective of the Tsunami Inundation area identified by the Greater Christchurch Partnership as part of its consultation on the Greater Christchurch Spatial Plan.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				so there is a disconnect between the use of the term 'avoid' and what the provisions would allow for as a permitted activity.	
9.	5.4A	Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area	Oppose in Part	Spatial identification of coastal hazard management areas should be made available through a set of non-statutory maps, which would operate as interactive maps on the Council's GIS website – thereby operating as a separate mapping viewer to the statutory District Plan maps. This approach is different to that of the traditional means of displaying hazard overlays on district plan maps and reflects that these maps do not have regulatory effect. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and	<p>The references in all rules in this section to “the areas shown on the planning maps as...”, should be amended to reference <u>interactive maps on the Council's GIS website and the return period of the mapped hazard should be reduced to a 1 in 100 year event.</u></p> <p>Rule 54A.5 NC3 should be amended as follows:</p> <p>a. Development, subdivision and land use that would provide for residential intensification of any site within the Qualifying Matter Tsunami Management Area except that permitted or controlled in Rules 14.4.1_and 14.4.2.</p> <p>Any consequential amendments to zones, overlays, precincts, and qualifying matters to reflect the relief sought in the submission.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>without a reliance on the Schedule 1 Resource Management Act 1991 process. OCHT notes that this is an approach taken by other Councils around the country.</p> <p>Rule 54A.5 NC3 makes development, subdivision and land use that would provide for residential intensification of any site within the Qualifying Matter Tsunami Management Area except that permitted or controlled in Rule 14.4.1.</p> <p>Rule 14.4.2 deals with controlled activities so the rule outlined above needs to be amended to reference Rule 14.4.2.</p> <p>There is no applicable rules in the subdivision chapter for the Tsunami Management Area.</p> <p>Rule 14.4.1 provides for up to four residential units to be</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				constructed as a permitted activity. If this level of intensification is provided for, then having a non-complying activity status and an avoid policy seems non-sensical.	
Chapter 6 – General Rules and Procedures					
6.10A – Tree Canopy Cover and Financial Contributions					
10.	6.10A	<p>6.10A</p> <p>Rules 8.3, 8.5.1 and 8.7.12 - Subdivision;</p> <p>Rules 14.4.2 – 14.11.2 – Residential Built Form Standards.</p> <p>14.6.1.3 RD13.</p> <p>14.6.2.7 - Landscaping and tree cover.</p>	Oppose	<p>OCHT welcomes the Council’s recognition of trees as a key element in successful urban environments. This aligns with our internal landscape design guides which inform all our projects and the need to integrate landscaping with housing.</p> <p>OCHT strongly support the Council increasing its prioritisation of the need to renew streetscapes, especially in areas where intensification has and will continue to occur. Such renewals should include kerb and channel</p>	Delete Section 6.10A and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>replacement, undergrounding of overhead wires, and street tree planting.</p> <p>OCHT has substantial concerns with the 20% tree canopy cover target and considers it fundamentally unachievable in medium and high density environments on private land. OCHT consider the requirements to achieve 20% tree canopy cover is inconsistent with the spatial outcome requirements set out in the NPS-UD, and the Medium Density Residential Standard (MDRS) provisions of the Housing Supply Act.</p> <p>OCHT considers that the proposed financial contribution calculator is complicated and flawed, a simpler formula would be to require 1 tree to be planted per 100m² of site area, as an easier compliance threshold</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>than a trigger of 10% of future canopy cover.</p> <p>It also has concerns with the reliance on Financial Contributions. Given that Council already own extensive areas of park and open space land (including several thousand hectares of land on the Port Hills and Red Zone), in addition to extensive road reserve and local park areas, and given that Council takes Development Contributions for new parkland as part of any new development, the need for the land component to form part of the financial contributions appears to be particularly hard to justify.</p> <p>The need to provide rapid canopy cover potentially creates a perverse incentive to plant faster growing exotic species rather than natives. The proposed Financial Contribution could therefore</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				result in a decline in biodiversity by driving developers to plant exotics over natives, with attendant adverse biodiversity outcomes, which is contrary of the desire in the Urban Forest Plan to seek diversity in tree species.	
Chapter 8 – Subdivision, Development and Earthworks					
11.		<p>Tree Canopy and Financial Contribution provisions:</p> <p>Objective 8.2.6 and associated policies;</p> <p>Clause 8.3.1(e)-(f) – how to apply to the rules</p> <p>Clause 8.3.3(b) – financial contributions</p>	Oppose	In line with our submission seeking the deletion of the tree canopy financial contribution rules, the related proposed references to tree canopy in the subdivision chapter policies and rules is also opposed.	Delete the provisions relating to the tree canopy financial contribution and associated tree canopy rules.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>Clause 8.3.7 – consent notices</p> <p>Clause 8.7.12 – Assessment matters</p>			
12.		<p>8.9.2.1 – Earthworks</p> <p>Table 9</p>	Support in Part	<p>Earthworks are permitted through rule 8.9.2.31(P1), provided they comply with the volumes specified in Table 9.</p> <p>Table 9(d) in the Operative Plan limits earthworks to no more than 20m³ in all residential zones. Whilst these volumes do not include earthworks associated with a Building Consent i.e foundation construction, they are invariably triggered through the formation of driveways and landscaping. In practice, a 20m³ limit is frequently triggered for low density suburban development let alone medium density outcomes. As an example a standard driveway for a single dwelling</p>	<p>Amend Table 9(d) so the maximum volume is <u>250m³</u>/ site <u>net fill above existing ground level</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>is 4m wide by say 30m long = 120m². To build the driveway requires existing earth to be removed to a depth of 20cm, and then replaced with basecourse prior to being gravelled or asphalted. There is no change to existing ground levels. The cut is 24m³ (120m² x 0.2m depth), with fill being the same, resulting in 48m³.</p> <p>The rule threshold is considered to be unrealistically low, such that it generates numerous consents that are invariably granted. The key effects that need to be controlled with earthworks are erosion and sediment control during construction (although the scale of such works means that they are generally completed within a couple of days and therefore do not generated significant risks of sediment discharge), and permanent changes to finished ground levels that would</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>result in overlooking of neighbouring properties i.e. forming raised mounds or terraces.</p> <p>It is therefore sought that the rule be amended so the volume is net fill above existing ground levels. It is noted that filling within Flood Management Areas is separately controlled in Chapter 5.</p>	
Residential Zone Introduction and Policy Framework – 14.1-14.2					
13.		Policy 14.2.1.1 – Policy – Housing distribution and density	Support in Part	<p>Support the amendments to clause (a)(ii) and (iii) that clearly state the expectation that high density residential development will be established in both the Central City and in and near identified commercial centres.</p> <p>By amending clause (iii) to now reference high density, the policy is now silent on the</p>	<p>Retain clauses (a)(ii) and (iii).</p> <p>Add a new clause (a)(iv) as follows (with consequential renumbering of subsequent clauses):</p> <p><u>(iv) medium density residential development is established across the majority of the City unless precluded by a qualifying matter.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				locations and expectation of medium density development. Given that the introduction of MRZ across most of the City, there is a need for a clear statement in the policy regarding what is now the normative housing density.	
14.		Policy 14.2.5.2 – high quality medium density residential developments	Support in Part	<p>Support the amendments to reference the planned urban character.</p> <p>References to ‘high’ quality in the title will not always be appropriate or realistic.</p>	<p>Amend policy as follows:</p> <p>14.2.5.2 Policy – High Good quality, medium density residential development</p> <p>Encourage innovative approaches to comprehensively designed, high good quality, medium density residential development, which is attractive to residents, responsive to housing demands, and provides a positive contribution to its environment (while acknowledging the need for increased densities and changes in residential character) <u>reflects the planned urban built character of an area</u>, through:</p> <p>i. consultative planning approaches to identifying particular areas for residential intensification and to defining high good quality, built and urban design outcomes for those areas;</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<ul style="list-style-type: none"> ii. encouraging and incentivising amalgamation and redevelopment across large-scale residential intensification areas; iii. providing design guidelines to assist developers to achieve high good quality, medium density development; iv. considering input from urban design experts into resource consent applications; v. promoting incorporation of low impact urban design elements, energy and water efficiency, and lifestage inclusive and adaptive design; and vi. recognising that built form standards may not always support the best design and efficient use of a site for medium density development, particularly for larger sites.
15.		Policy 14.2.5.3 – quality large scale developments	Support in Part	<p>The policy is generally appropriate and captures the key design elements necessary to support the good design of more intensive residential complexes.</p> <p>As above, ‘good quality’ is considered to be a more appropriate term than ‘high quality’.</p>	<p>14.2.5.3 Policy – Good qQuality large scale developments</p> <ul style="list-style-type: none"> a. Residential developments of four or more residential units contribute to a high good quality residential environment through site layout, building and landscape design to achieve: <ul style="list-style-type: none"> i. engagement with the street and other spaces;

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<ul style="list-style-type: none"> ii. minimisation of the visual bulk of buildings and provision of visual interest; i. a high good level of internal and external residential amenity; ii. high good quality shared spaces, including communal living spaces and accessways that provide safe, direct access for pedestrians; iii. a safe and secure environment; and iv. public through connections for large sites with multiple public frontages.
14.3 How to interpret and apply the rules					
16.		14.3 How to interpret and apply the rules – Clause f. xvi.	Oppose	The proposed deletion is consequential to the deletion of the Residential Heritage Area qualifying matter.	<p>f. There are parts of residential zones where the permitted development, height and/or density directed by the MDRS or Policy 3 of the NPS-UD may be modified by qualifying matters. These are identified in detail in Chapter 6.1A and the Planning Maps, and include the following:</p> <ul style="list-style-type: none"> i. Historic Heritage including heritage items, heritage settings, Residential Heritage Area, Residential Heritage Area Interface

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
14.4 Residential Suburban and RSDT Zone rules					
17.	Residential	14.4.2.2 – Tree and garden planting	Oppose	<p>The proposed amendments to this rule duplicate and confuse the regulatory framework with the tree FC rule – essentially it introduces two rules to control the same matter.</p> <p>OCHT oppose the tree FC rule and this rule amendment for the reasons given in the submission on the tree FC rule.</p> <p>In the event that the tree FC rule is retained, this rule should simply have an advice note directing Plan users to the FC rule and the additional tree canopy outcomes sought in that separate rule.</p>	Delete the proposed amendments and retain the Operative Plan rule.
14.5 Medium Density Zone Rules					

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
18.	Residential	All controlled and RD rules re notification statements		<p>Consistent logic needs to be applied to the notification statements as follows:</p> <p>If the rule controls an internal occupant amenity matter or general street-scape outcomes then rule breaches should be non-notified as it is only the occupant who is affected or passers-by;</p> <p>If the rule it controls a neighbouring site interface matter then it should be open to an assessment re limited notification but should not be publicly notified. Ltd but not full;</p> <p>If it rule controls a matter that could impact on urban form at a neighbourhood scale e.g. height, then it should be open to a full s95 assessment.</p>	<p>Amend notification statements in both activity and built form rules to align with this logic.</p> <p>Non-notified:</p> <p>14.5.1.3 (RD1) – four or more units</p> <p>14.5.2.2 – landscaping</p> <p>14.5.2.5 – Outdoor Living Space</p> <p>14.5.2.8 – Outlook space</p> <p>14.5.2.9 – Fencing</p> <p>14.5.2.10 – Windows to street</p> <p>14.5.2.11 – Minimum unit size</p> <p>14.5.2.12 – Ground floor habitable space</p> <p>14.5.2.13 – Service and storage space</p> <p>14.5.2.15 – Garage and carports</p> <p>14.5.2.16 – Building reflectivity</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>14.5.2.16 – mechanical ventilation</p> <p>14.5.2.18 – Spine road setbacks</p> <p>Open to limited but not public notification:</p>
19.	Residential	Assessment matters	Oppose	<p>The proposed assessment matters for both the '4 or more units' urban design rule and the built form rules are excessive and overlapping. They should be simplified and consolidated.</p>	<p>For the 'non-notified' rules set out above, the matters for assessment should be limited to the adequate provision of amenity for occupants and the delivery of a functional and attractive streetscape.</p> <p>For the rules that potentially affect neighbouring sites set out above, additional matters relating to consideration of the amenity of neighbouring sites are appropriate.</p> <p>For height, additional matters relating to urban form and proximity to services and public and active transport modes are appropriate, along with consideration of wind effects for buildings over 22m in height.</p> <p>For the 4+ unit urban design rule, matters of discretion should be as follows:</p> <p>a) Whether the design of the development is in keeping with, or complements, the scale and</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>character of development anticipated for the surrounding area and relevant significant natural, heritage and cultural features.</p> <p>b) The relationship of the development with adjoining streets or public open spaces including the provision of landscaping, and the orientation of glazing and pedestrian entrances;</p> <p>c) Privacy and overlooking within the development and on adjoining sites, including the orientation of habitable room windows and balconies;</p> <p>d) The provision of adequate outdoor living spaces, outdoor service spaces, waste and recycling bin storage including the management of amenity effects of these on occupants and adjacent streets or public open spaces;</p> <p>Where on-site car parking is provided, the design and location of car parking (including garaging) as viewed from streets or public open spaces</p>
20.	Residential	14.5.2.2 – Landscaping and tree canopy	Oppose	In accordance with our submission seeking deletion of the tree canopy financial contribution rule, the	<p>Delete rule and replace with the following:</p> <p><u>14.5.2.2 landscaped area.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>landscaping and tree canopy rule should be deleted and replaced with the MDRS standard.</p> <p>An additional clause is proposed for non-residential activities that aligns with the MDRS outcomes.</p>	<p><u>(1) A residential unit at ground floor level must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p> <p><u>2. The landscaped area may be located on any part of the development site, and does not need to be associated with each residential unit.</u></p> <p><u>3. Non-residential activities must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p>
21.	Residential	14.5.2.4 – Building Coverage	Support in Part	<p>The rule implements MDRS as per Schedule 3A.</p> <p>Support additional exemptions for eaves and guttering, although this should be extended to 600mm which is a standard eave depth and better provides for weather tightness design solutions. Eaves do not have a significant impact on visual dominance, and setbacks from neighbours</p>	<p>Amend rule as follows:</p> <ol style="list-style-type: none"> The maximum building coverage must not exceed 50% of the net site area. ... <u>Eaves and roof overhangs up to 300mm 600mm in width and guttering up to 200mm in width form the wall of a building shall not be included in the building coverage calculation.</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				are controlled through separate rules on internal setbacks and height-to-boundary.	
22.	Residential	14.5.2.7 – Building setbacks	Support in Part	<p>Support clauses (a)(i) and (ii) as implements MDRS as per Schedule 3A.</p> <p>Support clause (iii) enabling eaves and gutters to project into the road boundary setback. Extend the eave exemption to 600mm to align with standard building practice, along with enabling deeper porches which have a strong functional benefit. Such projections have a minimal impact on streetscape amenity and can have benefits through providing greater articulation in the street-facing facade.</p> <p>Clause (iv) – support reduction in setbacks for accessory buildings, subject to the limitations to height and</p>	<p>Retain clause (a)(i) and (ii) as notified.</p> <p>Amend clause(a)(iii) as follows:</p> <p>Only road boundary: Eaves, and roof overhangs, and <u>porches</u> to a maximum of 300mm <u>600mm</u> in width measured from the wall of a building and guttering up to 200mm in width.</p> <p>Amend clause (a)(iv) as follows:</p> <p>All other accessory buildings or garages, <u>including garages</u> that internally access a residential unit.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				length in the rule. A grammatical amendment would be helpful to clarify that accessory buildings do not need to have internal access to the dwelling	
High Density Residential Zone					
23.	Residential	Controlled and Restricted Discretionary notification statements	Support in Part	<p>Consistent logic needs to be applied to the notification statements as follows:</p> <p>If the rule controls an internal occupant amenity matter or general street-scape outcomes then rule breaches should be non-notified as it is only the occupant who is affected or passers-by;</p> <p>If the rule it controls a neighbouring site interface matter then it should be open to an assessment re limited notification but should not be</p>	<p>Amend notification statements in both activity and built form rules to align with this logic.</p> <p>Non-notified:</p> <p>14.6.1.3 (RD2) – four or more units</p> <p>14.6.2.7 – landscaping</p> <p>14.6.2.10 – Outdoor Living Space</p> <p>14.6.2.4 – Outlook space</p> <p>14.6.2.5 – Building separation</p> <p>14.6.2.6 – Fencing</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>publicly notified. Ltd but not full;</p> <p>If it rule controls a matter that could impact on urban form at a neighbourhood scale e.g. height, then it should be open to a full s95 assessment.</p>	<p>14.6.2.8 – Windows to street</p> <p>14.6.2.16 – Minimum unit size</p> <p>14.6.2.9 – Ground floor habitable space</p> <p>14.6.2.11 – Service and storage space</p> <p>14.6.2.14 – Garage and carports</p> <p>14.6.2.15 – mechanical ventilation</p> <p>14.6.2.17 – Spine road setbacks</p> <p>Open to limited but not public notification:</p> <p>14.6.2.12 – Building coverage</p> <p>14.6.2.2 – height to boundary</p> <p>14.6.2.3 – internal boundary setbacks</p> <p>14.6.2.13 – Water for Firefighting (FENZ only)</p> <p>Open to full s95 assessment:</p> <p>14.6.2.1 – height</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
24.	Residential	Assessment matters	Oppose	<p>The proposed assessment matters for both the '4 or more units' urban design rule and the built form rules are excessive and overlapping. They should be simplified and consolidated.</p>	<p>For the 'non-notified' rules set out above, the matters for assessment should be limited to the adequate provision of amenity for occupants and the delivery of a functional and attractive streetscape.</p> <p>For the rules that potentially affect neighbouring sites set out above, additional matters relating to consideration of the amenity of neighbouring sites are appropriate.</p> <p>For height, additional matters relating to urban form and proximity to services and public and active transport modes are appropriate, along with consideration of wind effects for buildings over 22m in height.</p> <p>For the 4+ unit urban design rule, matters of discretion should be as follows:</p> <p><u>e) Whether the design of the development is in keeping with, or complements, the scale and character of development anticipated for the surrounding area and relevant significant natural, heritage and cultural features.</u></p> <p><u>f) The relationship of the development with adjoining streets or public open spaces including</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p><u>the provision of landscaping, and the orientation of glazing and pedestrian entrances;</u></p> <p>g) <u>Privacy and overlooking within the development and on adjoining sites, including the orientation of habitable room windows and balconies;</u></p> <p>h) <u>The provision of adequate outdoor living spaces, outdoor service spaces, waste and recycling bin storage including the management of amenity effects of these on occupants and adjacent streets or public open spaces;</u></p> <p>i) <u>Where on-site car parking is provided, the design and location of car parking (including garaging) as viewed from streets or public open spaces.</u></p>
25.	Residential	14.6.2.7 - Landscaping and tree cover	Oppose	<p>In accordance with our submission seeking deletion of the tree canopy financial contribution rule, the landscaping and tree canopy rule should be deleted and replaced with the MDRS standard.</p> <p>An additional clause is proposed for non-residential</p>	<p>Delete rule and replace with the following:</p> <p><u>14.5.2.2 landscaped area</u></p> <p><u>(1) A residential unit at ground floor level must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				activities that aligns with the MDRS outcomes.	<p><u>2. The landscaped area may be located on any part of the development site, and does not need to be associated with each residential unit.</u></p> <p><u>3. Non-residential activities must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p>
26.	Residential	14.6.2.12 - Building coverage	Support in Part	<p>The rule implements MDRS as per Schedule 3A.</p> <p>Support additional exemption for eaves and guttering, although this should be extended to 600mm which is a standard eave depth and better provides for weather tightness design solutions. Eaves do not have a significant impact on visual dominance, and setbacks from neighbours are controlled through separate rules on internal setbacks and height-to-boundary.</p>	<p>Amend as follows:</p> <p>a. <u>The maximum building coverage must not exceed 60% of the net site area;</u></p> <p>i. <u>Any eaves and roof overhangs up to 300mm 600mm in width and guttering up to 200mm in width from the wall of a building shall not be included in the building coverage calculation.</u></p> <p>Delete Clause (a)(ii)</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Clause (a)(ii) seeks to enable greater site coverage in the HRZ. An increase to 60% is supported and is a useful tool in differentiating between MRZ and HRZ.	
27.	Residential	14.6.2.14 - Garaging	Oppose	<p>Whilst the equivalent rule in the MRZ requires garaging to be recessed behind the front façade, this rule requires garaging to be located behind the rear façade of a residential unit.</p> <p>This rule is unworkable for carparking levels in apartment buildings where such parking is invariably located beneath (or above) a residential unit rather than behind the unit's rear façade.</p> <p>For smaller scale developments i.e.. 2-3 storey, having parking recessed behind the front façade provides an acceptable</p>	<p>Delete the rule and replace as follows:</p> <p><u>14.6.2.14 garaging and carports</u></p> <p><u>Where a residential unit fronts towards a road, any garage or carport shall be located at least 1.2 metres behind the front façade of a residential unit.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>outcome, in combination with the urban design assessment matters for 4+ units.</p> <p>The rule wording sought in the equivalent rule in the MRZ is considered to be equally applicable.</p>	
28.	Residential	14.6.2.17 - Spine road setbacks	Oppose	<p>The new rule requires buildings and outdoor living spaces to be set back 4m from spine road corridors (where the corridor is less than 24m in width).</p> <p>It is understood that the intention of the rule is to enable road widening in the future to accommodate public rapid transit. If Council's intention is to acquire land in the future to facilitate public works then it should use the designation powers available to it.</p>	<p>Delete the rule.</p> <p>If land acquisition for public works is the intent, then Council should initiate a Notice of Requirement to designate the corridor.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Given the highly developed nature of these existing corridors with lengthy sections of commercial property built to the road boundary, it is unclear how any corridor-long road widening will occur without major land acquisition and demolition.	

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details


Submission Date: 12/05/2023

First name: Rebecca **Last name:** Eng

Organisation: Transpower New Zealand Limited

Preferred method of contact Email

Attached Documents

Name	
Transpower New Zealand Limited Submission on Christchurch District Plan Plan Change 14 (Final)	

Submission by Transpower New Zealand Limited

Christchurch District Plan – Proposed Plan Change 14: The Housing and Business Choice Plan Change

12 May 2023

Keeping the energy flowing



Form 5

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

Clause 6 of Schedule 1, Resource Management Act 1991

To Christchurch City Council ("the Council")

Name of submitter: Transpower New Zealand Limited ("Transpower")

This is a submission on changes proposed to the following operative plan ("Proposed Plan Change"):

Proposed Plan Change 14: The Housing and Business Choice Plan Change to the Christchurch District Plan ("District Plan").

Transpower could not gain an advantage in trade competition through this submission.

The specific provisions of the Proposed Plan Change that my submission relates to are:

The Proposed Plan Change in its entirety, and particularly the extent to which the Proposed Plan Change:

- gives effect to the National Policy Statement on Electricity Transmission 2008 ("NPSET");
- gives effect to the Canterbury Regional Policy Statement (republished July 2021) ("CRPS"); and
- recognises the National Grid as a qualifying matter in the implementation of the Resource Management (Enabling Housing Supply and other Matters) Amendment Act 2021 ("RMA-EHS").

Transpower's submission is:

Background and context

Transpower is the state-owned enterprise that plans, builds, maintains, owns and operates New Zealand's high voltage electricity transmission network, known as the National Grid, that carries electricity across the country. Transpower provides the required infrastructure to transport electricity from the point of generation to local electricity distribution companies, which supply electricity to everyday users.

Transpower needs to efficiently operate, maintain, upgrade and develop the National Grid to meet increasing demand; to connect new generation; and to ensure security of supply, thereby contributing to New Zealand's economic and social aspirations. For this reason, Transpower has a significant interest in the development of an effective, workable, and efficient Christchurch District Plan where it may affect the National Grid. In respect of the Proposed Plan Change, providing for greater residential densities in the vicinity of the National Grid has the potential to significantly impact Transpower's ability to operate, maintain, upgrade and develop the National Grid.

Appendix A includes further background information, including an overview of Transpower.

Statutory framework

The NPSET confirms the national significance of the National Grid and establishes national policy direction to ensure that decision-makers under the Resource Management Act 1991 ("RMA") recognise and provide for the benefits of electricity transmission, while managing effects of the National Grid and managing the effects of activities and development in the vicinity of the National Grid.

The single Objective of the NPSET is:

"To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:

- *managing the adverse environmental effects of the network; and*
- *managing the adverse effects of other activities on the network.”*

Policies 10 and 11 of the NPSET provide the primary direction on the management of adverse effects of subdivision, land use and development activities on the transmission network.

Similarly, the CRPS includes Policy 16.3.4, which is specific to the National Grid, and addresses subdivision, land use and development activities that may limit the ability of the electricity transmission network to be operated, maintained, upgraded and developed.

Together, these policies are critical matters for a district plan to address and are specifically relevant to Transpower’s submission on the Proposed Plan Change.

The relevant statutory provisions are included in further detail in **Appendix A**.

National Grid assets in Christchurch

Appendix A includes a description of the National Grid assets in Christchurch. A map of existing National Grid assets in Christchurch City is included as **Appendix B**. Appendix 3 to Part 2 of the Section 32 Report that accompanies the Proposed Plan Change identifies over 1000 sites and approximately 54 hectares of land that is subject to the Proposed Plan Change and also within either the National Grid Yard or the corridor for electricity distribution lines.¹

By way of example, an excerpt of the Proposed Plan Change qualifying matter planning map illustrating the location of the National Grid qualifying matter in Islington is included below as Figure 1.

Figure 1: Excerpt of Planning Map 36 Qualifying Matter - Existing and Proposed (Notified 23/09/2022) National Grid transmission lines qualifying matter (red hatched area) in the vicinity of the Islington Substation



The National Grid as a ‘qualifying matter’

Transpower acknowledges that the Proposed Plan Change, being an Intensification Planning Instrument (“IPI”), is to:

- incorporate the MDRS of the Resource Management (Enabling Housing Supply and other Matters) Amendment Act 2021 (“RMA-EHS”),

¹ It is assumed that this area does not include the National Grid Subdivision Corridor.

- give effect to Policies 3 and 4 of the National Policy Statement on Urban Development 2020 (“NPS-UD”); and
- include objectives and policies in accordance with clause 6 to Schedule 3A of the RMA (section 77G5).

Sections 77I and 77O of the RMA-EHS provides a specified territorial authority may make the MDRS and the relevant building height or density requirements under Policy 3 of the NPS-UD less enabling of development in relation to a ‘qualifying matter’. A ‘qualifying matter’ is defined by section 77I and 77O of the RMA-EHS.

The National Grid corridor provisions (being those that relate to the National Grid Yard and National Grid Subdivision Corridor described in Appendix A) clearly meet the definition of a ‘qualifying matter’ because:

- the provisions are required to give effect to the NPSET being a national policy statement (other than the NPS-UD);
- the provisions are required for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure; and
- provisions that restrict subdivision and development in the vicinity of the National Grid are included in the Operative District Plan.

An assessment, as required by section 77K(1) of the RMA, to supplement the assessment included in the Section 32 Report (Appendix 3 to Part 2) and to support the incorporation of the National Grid corridor provisions as an existing qualifying matter in the IPI is included in **Appendix A**.

Proposed Plan Change 14

The Proposed Plan Change, amongst other matters:

- includes the National Grid Yard provisions that apply in certain residential and commercial zones as an existing qualifying matter; and
- adds a new layer in the planning maps ‘Qualifying Matter - Electricity Transmission Corridors and Infrastructure – existing and proposed’ to identify where the qualifying matter applies.

Transpower’s submission

Transpower’s submission on the Proposed Plan Change generally supports the proposed provisions and particularly supports the identification of the National Grid as a qualifying matter and the inclusion of the National Grid Yard provisions in the IPI. That said, Transpower seeks the provisions are amended to ensure that the rule framework for subdivision within the National Grid Subdivision Corridor in the District Plan is explicitly included as part of the existing National Grid qualifying matter. In addition, Transpower’s submission seeks limited amendments to provisions that address qualifying matters in the District Plan, along with amendments in relation to the Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area and Tree Canopy provisions. It is Transpower’s conclusion that these amendments are necessary to:

- establish a clear and appropriate expectation of future subdivision and development in the vicinity of the National Grid;
- provide greater clarity for plan users;
- give effect to Policies 1, 2, 10 and 11 of the NPSET;
- give effect to the Policy 4 of the NPSUD;
- give effect to Policy 16.3.4(2) of the CRPS;
- meet the requirements of section 32 and 75 of the RMA; and therefore
- achieve the purpose of the RMA.

Transpower’s specific submission points are included in **Appendix C**.

Transpower seeks the following decision from the local authority:

Retain or amend the provisions of the Proposed Plan Change to give effect to the NPSET and CRPS as set out in **Appendix C** including such further alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Transpower wishes to be heard in support of its submission.

Due to the specific interests of Transpower, and particularly the national significance of the National Grid, Transpower will not consider presenting a joint case.



**Signature of person authorised to sign
on behalf of Transpower New Zealand Limited**

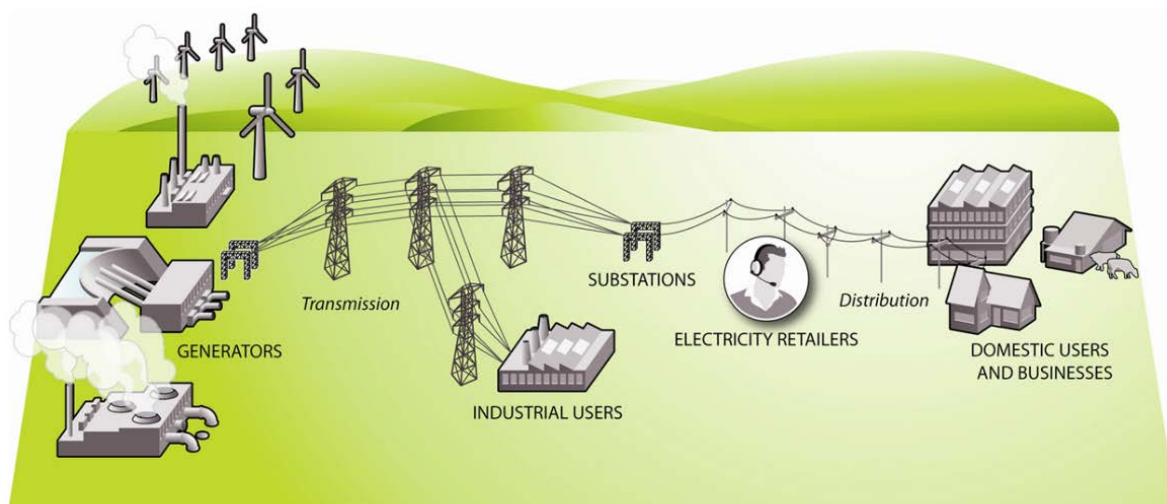
Date:	12 May 2022
Electronic address for service:	environment.policy@transpower.co.nz
Telephone:	+64 9 590 7072
Postal address:	PO Box 17 215 Greenlane, Auckland 1546
Contact person:	Rebecca Eng

Appendix A: Supporting Information

About Transpower

Transpower is the state-owned enterprise that plans, builds, maintains, owns and operates New Zealand's high voltage electricity transmission network, known as the National Grid. The National Grid connects power stations, owned by electricity generating companies, directly to major industrial users and distribution companies feeding electricity to the local networks that, in turn, distribute electricity to homes and businesses. The role of Transpower is illustrated in Figure 2.

Figure 2: Role of Transpower in New Zealand's Electricity Industry (source: MBIE)



The National Grid stretches over the length and breadth of New Zealand from Kaikohe in the North Island to Tiwai Point in the South Island and comprises some 11,000 kilometres of transmission lines and cables and more than 170 substations, supported by a telecommunications network of some 300 telecommunication sites that help link together the components that make up the National Grid.

Transpower's role and function is determined by the State-Owned Enterprises Act 1986, the company's Statement of Corporate Intent, and the regulatory framework within which it operates. Transpower does not generate electricity, nor does it have any retail functions.

It is important to note that Transpower's role is distinct from electricity generation, distribution or retail. Transpower provides the required infrastructure to transport electricity from the point of generation to local lines distribution companies, which supply electricity to everyday users. These users may be a considerable distance from the point of generation.

Transpower's Statement of Corporate Intent for 1 July 2022, states that:

"Transpower is central to the New Zealand electricity industry, connecting New Zealanders to their power system through safe, smart solutions for today and tomorrow. Our principal commercial activities are:

- as grid owner, to reliably and efficiently transport electricity from generators to distributors and large users; and

- as system operator, to operate a competitive electricity market and deliver a secure power system.”

In line with this role, Transpower needs to efficiently operate, maintain and develop the network to meet increasing demand and to maintain security of supply, thereby contributing to New Zealand’s economic and social aspirations. It must be emphasised that the National Grid is an ever-developing system, responding to changing supply and demand patterns, growth, reliability and security needs.

As the economy electrifies in pursuit of the most cost efficient and renewable sources, the base case in Transpower’s ‘*Whakamana i Te Mauri Hiko*’ predicts that electricity demand is likely to increase around 55% by 2050. ‘*Whakamana i Te Mauri Hiko*’ suggests that meeting this projected demand will require significant and frequent investment in New Zealand’s electricity generation portfolio over the coming 30 years, including new sources of resilient and reliable grid connected renewable generation. In addition, new connections and capacity increases will be required across the transmission system to support demand growth driven by the electrification of transport and process heat. Simply put, New Zealand’s electricity transmission system is the infrastructure on which our zero-carbon future will be built. This work supports Transpower’s view that there will be an enduring role for the National Grid in the future, and the need to build new National Grid lines and substations to connect new, renewable generation sources to the electricity network.

Transpower therefore has a significant interest in contributing to the process of developing an effective, workable and efficient Christchurch District Plan where it may affect the National Grid. In respect of the Proposed Plan Change, providing for greater residential densities in the vicinity of the National Grid has the potential to significantly impact on Transpower’s ability to operation, maintain, upgrade and develop the National Grid.

National Grid assets in Christchurch

Transpower owns and operates the following assets in Christchurch:

The following National Grid assets are within, or traverse, the Council’s jurisdiction:

- Bromley – Islington A (BRY-ISL A) 220kV double circuit transmission line on steel towers;
- Roxburgh – Islington A (ROX-ISL A) 220kV single circuit transmission line on steel towers;
- Benmore – Islington A (BEN-ISL A) 220kV single circuit transmission line steel towers;
- Islington – Kikawa A (ISL-KIK A) 220kV single circuit transmission line on steel towers;
- Islington – Kikawa B (ISL-KIK B) 220kV double circuit transmission line on steel towers;
- Hororata – Islington E (HOR-ISL E) 110kV double circuit transmission line on single poles;
- Islington Deviation A (ISL Deviation A) 66kV double circuit transmission line on steel towers; and
- Islington – Southbrook A (ISL-SBK A) 66kV double circuit transmission line on steel towers.

There are also three substations within Christchurch City, being Islington, Addington, and Bromley. Transpower also has a South Island System Control Site and a Southern Data Centre Site within Christchurch City. The location of these assets is shown on the map included as Appendix B.

Statutory Framework

National Policy Statement on Electricity Transmission 2008

The NPSET was gazetted on 13 March 2008. The NPSET confirms the national significance of the National Grid and provides policy direction to ensure that decision makers under the RMA:

- recognise and provide for the benefits of the National Grid;
- manage the adverse effects on the environment of the National Grid;
- manage the adverse effects of third parties on the National Grid; and
- facilitate long term strategic planning for transmission assets.

The NPSET only applies to the National Grid, being the assets used or operated by Transpower, and not to electricity generation or distribution networks.

The NPSET sets a clear directive on how to provide for National Grid resources (including future activities) when drafting planning documents and therefore councils have to work through how to make appropriate provision for the National Grid in their plans, in order to give effect to the NPSET.

The single Objective of the NPSET is:

“To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:

- *managing the adverse environmental effects of the network; and*
- *managing the adverse effects of other activities on the network.”*

The NPSET’s 14 policies provide for the recognition of the benefits of the National Grid, as well as the environmental effects of transmission and the management of adverse effects on the National Grid. The policies have to be applied by both Transpower and decision-makers under the RMA, as relevant. The development of the National Grid is explicitly recognised in the NPSET.

Policies 10 and 11 of the NPSET provide the primary direction on the management of adverse effects of subdivision, land use and development activities on the transmission network. These policies are critical matters for a District Plan to address, and are specifically relevant to the Proposed Plan Change.

Policy 10 is as follows:

“In achieving the purpose of the Act, decision-makers must to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised.”

Policy 11 relates to the development of buffer corridors, and is as follows:

“Local authorities must consult with the operator of the national grid, to identify an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for in plans and/or given resource consent. To assist local authorities to identify these corridors, they may request the operator of the national grid to provide local authorities with its medium to long-term plans for the alteration or upgrading of each affected section of the national grid (so as to facilitate the long-term strategic planning of the grid).”

Policy 12 requires the identification of the transmission network on territorial authority planning maps.

Section 75(3)(a) of the RMA requires that district plans must ‘give effect’ to a National Policy Statement. Case law has established that the words “give effect to” means to implement, which is a strong directive, creating a firm obligation on the part of those subject to it.

Canterbury Regional Policy Statement 2013

Section 75(3) of the RMA also requires the Proposed Plan to give effect to a regional policy statement. The operative CRPS (republished in July 2021) includes the following Policy 16.3.4 that is specific to the National Grid and must be given effect to:

“16.3.4 Reliable and resilient electricity transmission network within Canterbury

To encourage a reliable and resilient national electricity transmission network within Canterbury by:

1. *having particular regard to the local, regional and national benefits when considering operation, maintenance, upgrade or development of the electricity transmission network;*
2. *avoiding subdivision, use and development including urban or semi urban development patterns, which would otherwise limit the ability of the electricity transmission network to be operated, maintained, upgraded and developed;*
3. *enabling the operational, maintenance, upgrade, and development of the electricity transmission network provided that, as a result of route, site and method selection, where;*
 - a. *the adverse effects on significant natural and physical resources or cultural values are avoided, or where this is not practicable, remedied or mitigated; and*
 - b. *other adverse effects on the environment are appropriately controlled.”*

Clause 2 of Policy 16.3.4 is particularly relevant to the Proposed Plan Change and provides clear direction that subdivision, use and development, including urban development, that may limit the ability of the National to be operated, maintained, upgraded and developed must be avoided.

Operative District Plan National Grid Provisions

The District Plan contains provisions that relate to land use activities and subdivision within the defined areas in the vicinity of the National Grid. Within these areas subdivision, structures, activities and earthworks are subject to rules that are to protect the National Grid and give effect to the NPSET.

More specifically, within relevant residential and commercial zones in the District Plan:

- sensitive activities² and buildings (excluding accessory buildings associated with an existing activity) are a non-complying activity;
 - within 12 metres of the centre line of a 110kV or 220kV National Grid transmission line or within 12 metres of the foundation of an associated support structure; or
 - within 10 metres of the centre line of a 66kV National Grid transmission line or within 10 metres of the foundation of an associated support structure; or
- fences within 5 metres of a National Grid transmission line support structure foundation are a non-complying activity.³
- subdivision of any site (other than an allotment to provide for a network utility) located within the following corridors is a restricted discretionary activity where certain standards are achieved and is otherwise a non-complying activity:
 - 37 metres of the centre line of a 220kV National grid transmission line as shown on planning maps; or
 - 32 metres of the centre line of a 66kV or 110kV National grid transmission line as shown on planning maps.⁴

The National Grid as a ‘qualifying matter’

Sections 77I and 77O of the RMA-EHS provides a specified territorial authority may make the MDRS and the relevant building height or density requirements under Policy 3 less enabling of development in relation to a qualifying matter (as defined by section 77I and 77O of the RMA-EHS).

The National Grid provisions in the District Plan clearly meets the definition of a qualifying matter as:

² As defined in the District Plan.

³ For the purpose of this submission, the land use rules described above are referred to as the “National Grid Yard”.

⁴ For the purpose of this submission, the subdivision rules described above are referred to as the “National Grid Subdivision Corridor”.

- it is a matter required to give effect to the NPSET;
- it is a matter required for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure; and
- provisions that restrict development in relation to the National Grid are included in the Operative District Plan.

Giving effect to the NPSET

The NPSET confirms the national significance of the National Grid and addresses its effects. Importantly, it also addresses effects on the National Grid, including the activities of others (for example, residential development) and requires that these do not compromise the operation, maintenance, upgrading and development of the National Grid.

The NPSET mandates a corridor for this protection. Specifically, Policy 11 of the NPSET requires that local authorities consult Transpower to identify an appropriate buffer corridor within which sensitive activities (such as residential development) will generally not be provided for in plans and/or given resource consent. This outcome is appropriate and was tested through a comprehensive section 32 analysis undertaken by the Ministry for the Environment (when the NPSET was developed) and various planning processes including Board of Inquiry hearings.

Ensuring the safe or efficient operation of nationally significant infrastructure

Development under and near high voltage transmission lines presents risks to the safe and efficient operation of the National Grid and needs to be managed carefully. It is critical that any development near the National Grid occurs in an appropriate and safe way. Transpower seeks to ensure that risks such as electrical shocks are minimised to the greatest extent possible, access for vital maintenance and upgrade work is not constrained, and reverse sensitivity and direct effects are managed, so that its nationally significant infrastructure can continue to operate in the long-term, keeping the lights on across New Zealand.

Transpower is not opposed to residential development and understands the intent of the recent reforms to address issues with New Zealand's housing supply and affordability. Transpower is working with developers and individuals across New Zealand on a daily basis in an effort to accommodate and support new development in a manner which takes the National Grid assets fully into account. If new land uses are properly designed and managed, effects on the safe and efficient operation of the National Grid can be reasonably managed.

Transpower prefers, wherever possible, to manage such risks and effects proactively. Proactive management through appropriate planning rules such as buffer corridors or setbacks is the most effective way of ensuring development occurs in a manner that is compatible with the National Grid and is consistent with the policy direction in the NPSET and the resulting buffer corridor approach within district plans throughout New Zealand.

While assisting Councils to give effect to the NPSET, the National Grid corridors protect the safe and efficient operation of the National Grid by:

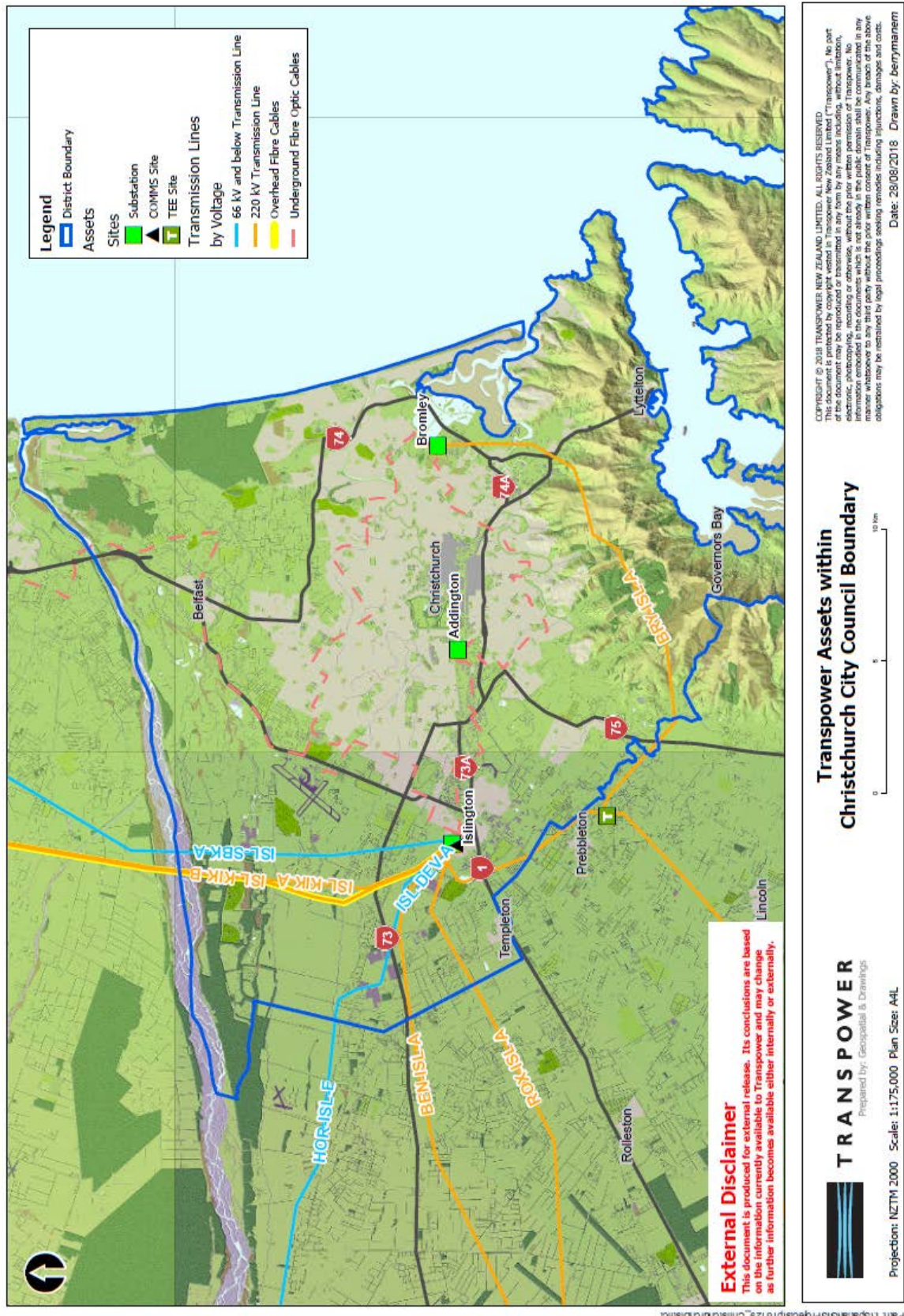
- ensuring that sensitive activities such as residential development will generally not be provided for in close proximity to the lines;
- partially minimising the risk of inadvertent contact with the lines including the risk of flashovers (where an electrical discharge 'jumps' the air gap between an object and the line);
- helping to reduce nuisance impacts on landowners and subsequent complaints about the lines;
- partially protecting the lines from activities and development that could have direct or indirect effects on them;

- partially protecting access to the National Grid by ensuring development activities cannot occur close to the National Grid and prevent Transpower's access to it; and
- partially enabling efficient and safe operation, maintenance, upgrade and development of the lines.

Summary

Based on the above, and consistent with the Council's Section 32 Report, it is submitted there is no ambiguity as to whether National Grid Yard and National Grid Subdivision Corridor are qualifying matters. It is noted that the Report of the Environment Committee on the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill dated December 2021, which noted at page 15 [emphasis added]: *"the qualifying matters set out in new section 77[I] include a matter of national importance and a matter required to ensure that nationally significant infrastructure operates safely or efficiently and avoid reverse sensitivity concerns. **This could include ensuring residential housing is safely set back from high voltage transmission lines, and other infrastructure such as airport noise areas, in order to avoid reverse sensitivity concerns**".*

Appendix B: Map of Transpower Assets in Christchurch



Appendix C: Specific Submission on Proposed Plan Change 14: The Housing and Business Choice Plan Change to the Christchurch District Plan

The following table sets out the decisions sought by Transpower, including specific amendments to the provisions of the Proposed Plan Change (shown in red underlined and ~~red strikethrough~~), and the reasons for Transpower's support for, or opposition to, the notified provisions of the Proposed Plan Change.

Provision	Support/ Oppose	Submission/Reasons	Decision Sought
Chapter 2 – Abbreviations and Definitions			
Definitions			
New definition of 'Qualifying matter'	Oppose	The concept of qualifying matters is introduced by the Resource Management (Enabling Housing Supply and other Matters) Amendment Act 2021. Qualifying matters are defined by section 77I and 77O of the RMA. Transpower seeks that the District Plan includes a definition of 'qualifying matter' to support the framework of the Proposed Plan Change and to assist plan users to understand and navigate the IPI. Furthermore, it will assist plan users to understand the application of qualifying matters given their relevance will extend beyond the IPI and remain in the District Plan.	Insert a new definition of qualifying matter to complement clause (b) in 6.1A.1 as follows: <u>"Qualifying matter means a matter referred to in section 77I or 77O of the RMA including as implemented by the provisions listed in 6.1A.1 Table 1."</u>
Chapter 3 Strategic Directions			
3.3.7 Objective – Well-functioning urban environment	Support in part	Transpower generally supports the Objective 3.3.7, and in particular the recognition of wellbeing and health and safety. It is noted that the initial clause of the Objective is mandatory, as directed by Schedule 3A of the RMA, and that the Proposed Plan Change seeks to provide further direction in respect of how a well-functioning urban environment might be achieved through the addition of further clauses. In this regard, Transpower does not oppose supplementing the mandatory text, but considers that the Objective, as notified, does not reflect the critical role qualifying matters also play in achieving a well-functioning urban environment. Transpower seeks that the Objective be further amended to recognise the role that providing for qualifying matters play in achieving a well-functioning urban environment by borrowing the expression used in 3.33 of the NPSUD. Further, it is considered that the inclusion of reference to qualifying matters within Chapter 3 gives an	Amend Objective 3.3.7 as follows: <u>3.3.7 Objective – Well-functioning urban environment</u> <u>a. 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;</u> <u>i. Within commercial and residential zones, a distinctive, legible urban form and strong sense of place, expressed through:</u> <u>A. Contrasting building clusters within the cityscape and the wider perspective of the Te Poho-o-Tamatea/the Port Hills and Canterbury plains; and</u>

Provision	Support/ Oppose	Submission/Reasons	Decision Sought
		appropriate platform for the subsequent provisions proposed in Sub-chapter 6.1A and the various Qualifying Matters provisions that are introduced by that Sub-chapter.	<p><u>B. Appropriate scale, form and location of buildings when viewed in context of the city's natural environment and significant open spaces, providing for:</u></p> <p><u>I. Larger scale development where it can be visually absorbed within the environment; and</u></p> <p><u>II. Lower heights and design controls for development located in more sensitive environments;</u></p> <p><u>C. The pre-eminence of the city centre built form, supported by enabling the highest buildings;</u></p> <p><u>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;</u></p> <p><u>E. The largest scale and density of development, outside of the city centre, provided within and around town centres, and lessening scale for centres lower in the hierarchy;</u></p> <p><u>ii. Development and change over time, including amenity values, in response to the diverse and changing needs of people, communities and future generations;</u></p> <p><u>iii. The cultural traditions and norms of Ngāi Tahu manawhenua; and</u></p> <p><u>iv. The benefits of urban environments that support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change; and</u></p> <p><u>x. The specific characteristics of qualifying matters."</u></p>
Chapter 5 Natural Hazards			
5.2.2.5.1 Policy – Managing development in Qualifying Matter Coastal Hazard Management Areas	Oppose	Transpower opposes Policy 5.2.2.5.1 to the extent that the Policy, as notified, is not sufficiently clear in respect of how and what activities the Policy directs are to be avoided. That is, clause (a) could have the effect of sterilizing the area subject to the Qualifying Matter Coastal Hazard Management Areas by preventing any, and all, activities. Such an approach is inconsistent with the purpose of the Proposed Plan Change and the statutory direction in respect of IPIs.	<p>Amend Policy 5.2.2.5.1 as follows:</p> <p><u>"5.2.2.5.1 Policy – Managing residential development in Qualifying Matter Coastal Hazard Management Areas</u></p> <p><u>a. Within the following Qualifying Matters, development, subdivision and land use that would provide for residential intensification of any site shall be avoided, unless the risk is from coastal inundation</u></p>

Provision	Support/ Oppose	Submission/Reasons	Decision Sought						
		Further, Transpower considers that 5.2.2.1.3 Policy — Infrastructure provides sufficient and appropriate policy direction in respect of infrastructure activities in areas subject to hazards and therefore concludes that the District Plan should be clear that Policy 5.2.2.5.1 does not apply to all activities, and specifically does not apply to infrastructure activities.	<u>and a site specific assessment demonstrates the risk is low or very low based on thresholds defined in Table 5.2.2.5.1a below:</u> <u>Coastal Hazard High Risk Management Area;</u> <u>Coastal Hazard Medium Risk Management Area.</u> ... <u>b. Replacement buildings, accessory buildings and extensions/additions to buildings are enabled where effects are mitigated to an acceptable level based on a site specific assessment, and having regard to the level and timing of the hazard. This could be by use of an appropriate risk based trigger or alternative methods."</u>						
5.2.2.5.2 Policy – Managing development within Qualifying Matter Tsunami Management Area	Oppose	Transpower opposes Policy 5.2.2.5.2 to the extent that the Policy, as notified, is not sufficiently clear in respect of how and what activities the Policy directs are to be avoided. That is, clause (a) could have the effect of sterilizing the area subject to the Qualifying Matter Tsunami Management Area by preventing any, and all, activities. Such an approach is inconsistent with the purpose of the Proposed Plan Change and the statutory direction in respect of IPIs. Further, Transpower considers that 5.2.2.1.3 Policy — Infrastructure provides sufficient and appropriate policy direction in respect of infrastructure activities in areas subject to hazards and therefore concludes that the District Plan should be clear that Policy 5.2.2.5.2 does not apply to all activities, and specifically does not apply to infrastructure activities.	Amend Policy 5.2.2.5.2 as follows: <u>"5.2.2.5.2 Policy – Managing residential development within Qualifying Matter Tsunami Management Area</u> <u>a. Within the Tsunami Management Area Qualifying Matter, avoid residential development, subdivision and land use that would provide for intensification of any site, unless the risk to life and property is acceptable."</u>						
5.4A Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area 5.4A.1 Permitted activities	Oppose	Transpower opposes 5.4A Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area on the basis that the Rules could apply to utilities and, in such circumstances, would not provide a consent pathway for utilities that is consistent with the District Plan approach to utilities in hazard areas in the operative provisions in Chapter 5. That is, where utilities are generally permitted. Transpower considers that, should the Rules apply to utilities, such an approach is inconsistent with the purpose of the Proposed Plan Change and the statutory direction in respect of IPIs and does not give effect to	Amend 5.4A Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area as follows: <u>"5.4A.1 Permitted activities</u> <u>a. There are no permitted activities.</u> <u>The activities listed below are permitted activities.</u> <table><tr><th colspan="2"><u>Activity</u></th><th><u>Activity specific standards</u></th></tr><tr><td><u>Px</u></td><td><u>Utilities</u></td><td><u>Nil</u></td></tr></table>	<u>Activity</u>		<u>Activity specific standards</u>	<u>Px</u>	<u>Utilities</u>	<u>Nil</u>
<u>Activity</u>		<u>Activity specific standards</u>							
<u>Px</u>	<u>Utilities</u>	<u>Nil</u>							

Provision	Support/ Oppose	Submission/Reasons	Decision Sought								
		higher order or operative provisions including 5.2.2.1.3 Policy – Infrastructure.									
Chapter 6 General Rules and Procedures											
Sub-chapter 6.1A Qualifying Matters											
6.1A.1 Application of qualifying matters	Support	Except as set out below in respect of Table 1 – Qualifying Matters, Transpower generally supports the introductory text in 6.1A.1 to the extent that the text appropriately reflects the direction given in the NPSUD in respect of the role, and effect, of qualifying matters.	Retain the introductory text in 6.1A.1 as notified.								
6.1A.1 Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3	Support in part	<p>Transpower supports the inclusion of the following provisions in Table 1 for the reasons set out earlier in this submission:</p> <ul style="list-style-type: none">14.4.1.5 NC6 – NC7 National Grid transmission and distribution lines;14.5.1.5 NC2 – NC3 National Grid transmission and distribution lines;14.7.1.5 NC2 National Grid transmission and distribution lines;14.12.1.5 NC1 – NC2 National Grid transmission and distribution lines;15.4.1.5 NC3 National Grid transmission and distribution lines;15.5.1.5 NC3 National Grid transmission and distribution lines; and15.10.1.5 NC2 National Grid transmission and distribution lines. <p>Transpower’s support is on the basis that the rules listed above include the National Grid Yard rules that apply to all residential and commercial zones that are traversed by the National Grid and also subject to the Proposed Plan Change.</p> <p>Transpower opposes Table 1 on the basis that the Table fails to identify the National Grid Subdivision Corridor (as associated provisions) as a qualifying matter. For the reasons set out earlier in this submission, and in order to give effect to Policy 4 of the NPSUD and Policies 10 and 11 of the NPSET, Transpower seeks that Table 1 be amended to include reference to Rule 8.5.1.3 RD5. In this regard, it is noted that the Appendix 3 to Part 2 of the Section 32 Reports ‘Carry Over Qualifying Matters, Operative Christchurch District Plan - Plan Change 14’ makes reference to the National Grid Subdivision Corridor provisions and does</p>	<p>Amend Table 1 as follows:</p> <table><tr><td><u>Qualifying matter rule reference</u></td><td><u>Type of the qualifying matter (RMA s77I or s77O)</u></td></tr><tr><td colspan="2"><u>Chapter 8 Subdivision, Development and Earthworks</u></td></tr><tr><td colspan="2"><u>Safe or efficient operation of nationally significant infrastructure (Electricity Transmission Corridors)</u></td></tr><tr><td><u>8.5.1.3 RD5 and 8.5.1.5 NC2 National Grid transmission lines</u></td><td><u>Section 77I(e) matter</u></td></tr></table>	<u>Qualifying matter rule reference</u>	<u>Type of the qualifying matter (RMA s77I or s77O)</u>	<u>Chapter 8 Subdivision, Development and Earthworks</u>		<u>Safe or efficient operation of nationally significant infrastructure (Electricity Transmission Corridors)</u>		<u>8.5.1.3 RD5 and 8.5.1.5 NC2 National Grid transmission lines</u>	<u>Section 77I(e) matter</u>
<u>Qualifying matter rule reference</u>	<u>Type of the qualifying matter (RMA s77I or s77O)</u>										
<u>Chapter 8 Subdivision, Development and Earthworks</u>											
<u>Safe or efficient operation of nationally significant infrastructure (Electricity Transmission Corridors)</u>											
<u>8.5.1.3 RD5 and 8.5.1.5 NC2 National Grid transmission lines</u>	<u>Section 77I(e) matter</u>										

Provision	Support/ Oppose	Submission/Reasons	Decision Sought
		not include a conclusion that the Subdivision Corridor be treated differently from the National Grid Yard (and provisions) that are qualifying matters.	
Sub-chapter 6.10A Tree Canopy Cover and Financial Contributions			
6.10A.2.1.3 Policy – Tree health and infrastructure	Support in part	Transpower generally supports 6.10A.2.1.3 Policy – Tree health and infrastructure but seeks limited amendments to ensure that the tree planting directed by the Policy does not compromise the National Grid in a manner that would not give effect to Policy 10 of the NPSET. It is noted that such an approach is consistent with advice notes that reference the Electricity (Hazards from Trees) Regulations 2003.	Amend 6.10A.2.1.3 Policy – Tree health and infrastructure as follows: <i><u>“a. Ensure that trees on a development site are planted in a position appropriate to the tree type and in sufficient soil volume, width and depth to maximise the tree’s healthy growth while minimising future nuisance effects and avoiding adverse effects on strategic infrastructure. ...”</u></i>
6.10A.4.1.1 Permitted activities Rule P1 and P2	Support in part	Transpower does not oppose the Rules in 6.10A.4.1.1 but seeks that the Rules include an advice note that references the Electricity (Hazards from Trees) Regulations 2003 in order to give effect to Policy 10 of the NPSET and ensure that future compliance with the Regulations is achieved. The wording, as an advice note, mirrors the advice note included in the operative provisions in Chapter 14 of the District Plan.	Amend 6.10A.4.1.1 Permitted activities Rule P1 and P2 to include the following as an advice note: <i><u>“Advice Note: Vegetation to be planted around the National Grid should be selected and/or managed to ensure that it will not result in that vegetation breaching the Electricity (Hazards from Trees) Regulations 2003.”</u></i>
Chapter 8 Subdivision, Development and Earthworks			
8.2.6.3 Policy – Tree health and infrastructure	Support in part	Transpower generally supports 8.2.6.3 Policy – Tree health and infrastructure but seeks limited amendments to ensure that the tree planting directed by the Policy does not compromise the National Grid in a manner that would not give effect to Policy 10 of the NPSET. It is noted that such an approach is consistent with advice notes that reference the Electricity (Hazards from Trees) Regulations 2003.	Amend 8.2.6.3 Policy – Tree health and infrastructure as follows: <i><u>“a. Ensure that trees on the development site are planted in a position appropriate to the tree type and in sufficient soil volume, width and depth to maximise the tree’s healthy growth while avoiding adverse effects on strategic infrastructure. ...”</u></i>
Chapter 10 Designations and Heritage Orders			
U3 Islington Substation, National Grid Operating Centre and National Grid Skills Training and Trial Facility	Support	The Proposed Plan Change seeks to amend the underlying zoning of Designation U3 (for which Transpower is the requiring authority) from Residential Suburban Zone to Medium Density Residential Zone. Transpower acknowledges that this change is as a consequence of the IPI. As such, the amendment to Designation U3 is not opposed.	Retain the underlying zoning of Designation U3 as notified.

Provision	Support/ Oppose	Submission/Reasons	Decision Sought
Chapter 14 Residential			
14.1 Introduction	Support in part	Transpower generally supports the text in 14.1 Introduction, but seeks limited amendments to reflect that, in some cases, qualifying matters may mean that any residential intensification is inappropriate (as opposed to being intensification being reduced), as is the case in respect of the National Grid Yard qualifying matter provisions.	Amend 14.1 Introduction as follows: <i>“...e. <u>A number of the provisions in this chapter give effect to the requirements of the Act and the National Policy Statement on Urban Development to provide for intensification in urban areas, including by implementing the Medium Density Residential Standards. However, the Act enables those intensification requirements to be reduced where justified by a “qualifying matter”. In this chapter the reduction in intensification, including the avoidance of intensification in some cases, due to qualifying matters has been implemented in two ways: by having the Medium Density Residential or High Density Residential zones, but enabling lesser, or no further, intensification than the Medium Density Residential Standards require in the areas or sites in those zones where a qualifying matter applies; or by having a lower density residential zone, for example the Residential Suburban or Residential Hills Zone, because the rules for that zone provide the level of density that the qualifying matter necessitates. Further information on qualifying matters can be found in 14.3, How to interpret and apply the rules, sub-clause g.”</u></i>
14.2.3 Objective - MDRS Objective 2	Support	Transpower supports 14.2.3 Objective MDRS Objective 2 noting it reflects that required under Schedule 3A Part 1(6)(2) of the RMA-EHS.	Retain 14.2.3 Objective MDRS Objective 2 as notified.
14.2.3.1 Policy - MDRS Policy 1	Support in part	Qualifying matters, including the National Grid Yard provisions, limit the amount of permitted medium density development possible on an allotment. While the policy directive within Policy 14.2.3.1 is supported (and reflects Schedule 3A, Part 1, clause (6)(2)(a) of the RMA), Transpower supports reference to qualifying matter areas as they directly influence the capacity for intensification and residential development.	Amend 14.2.3.1 Policy MDRS Policy 1 as follows: <i>“a. <u>enable a variety of housing types with a mix of densities within the zone, including 3-storey attached and detached dwellings, and low-rise apartments, while avoiding inappropriate locations, heights and densities of buildings and development within qualifying matter areas as directed by the relevant qualifying matter provisions.</u></i> ”
14.2.3.2 Policy - MDRS Policy 2	Support	Transpower supports 14.2.3.2 Policy – MDRS Policy 2 (noting it reflects that required under Schedule 3A Part 1(6)(2) of the RMA-EHS) in that it recognises qualifying matters.	Retain 14.2.3.2 Policy – MDRS Policy 2 as notified.

Provision	Support/ Oppose	Submission/Reasons	Decision Sought
14.2.3.3 Policy - MDRS Policy 5	Support	Transpower supports 14.2.3.3 Policy MDRS Policy 5 noting it reflects that required under Schedule 3A Part 1(6)(2) of the RMA-EHS.	Retain 14.2.3.3 Policy MDRS Policy 5 as notified.
14.2.6.1 Policy – MDRS Policy 1	Support in part	Qualifying matters, including the National Grid Yard provisions, limit the amount of permitted medium density development possible on an allotment. While the policy directive within Policy 14.2.6.1 is supported (and reflects Schedule 3A, Part 1, clause (6)(2)(a) of the RMA), Transpower supports reference to qualifying matter areas as they directly influence the capacity for intensification and residential development.	Amend 14.2.6.1 Policy MDRS Policy 1 as follows: “a. <u>enable a variety of housing types with a mix of densities within the zone, including 3-storey attached and detached dwellings, and low-rise apartments, while avoiding inappropriate locations, heights and densities of buildings and development within qualifying matter areas as directed by the relevant qualifying matter provisions.</u> ”
14.2.7.1 Policy – Provide for a high density urban form	Support in part	Qualifying matters, including the National Grid Yard provisions, may limit the amount of high density development possible on an allotment. For this reason, Transpower supports reference to qualifying matter areas as they directly influence the capacity for intensification and residential development.	Amend 14.2.7.1 Policy – Provide for a high density urban form as follows: “a. <u>Except where limited by a qualifying matter e</u> Enable the development of high density urban areas with a density that is responsive to current and planned: i. <u>degree of accessibility to services and facilities, public open space, and multimodal and active transport corridors; and</u> ii. <u>housing demand.</u> ”
14.3 How to interpret and apply the rules	Support	Transpower supports the clear direction given in clause (f) that qualifying matters apply (including in respect of the National Grid). It is considered that clause (f) clearly and succinctly assists plan users.	Retain 14.3 How to interpret and apply the rules as notified.
Chapter 15 Commercial			
15.3 How to interpret and apply the rules	Oppose	Transpower notes that the Proposed Plan Change includes amendments to Chapter 15 and also identifies the National Grid Yard provisions in Chapter 15 as a qualifying matter. For this reason, it is considered that the clear direction given in 14.3(f) is replicated in 15.3.	Amend 15.3 How to interpret and apply the rules to include the same or similar direction as given in 14.3.
Section 32 Report			
Section 32 Report	Support	Transpower generally supports the analysis of the National Grid as an existing qualifying matter in the Section 32 Report, including Appendix 3 to Part 2 of the Section 32 Reports ‘Carry Over Qualifying Matters, Operative Christchurch District Plan - Plan Change 14’	

Provision	Support/ Oppose	Submission/Reasons	Decision Sought
Planning Maps			
Planning Maps: General – extent of zones and development areas	Support in part	Transpower is neutral on the extent (as notified) of the various zones. However, should the extent of the zones be amended in the vicinity of the National Grid, Transpower seeks that the provisions that manage effects on the National Grid that are proposed as a qualifying matter (and as amended by this submission) are similarly extended to any new areas.	
Planning Maps: National Grid Yard	Support in part	Transpower generally supports the mapping of the National Grid Yard as a qualifying matter. However, Transpower seeks amendments to the maps to: <ol style="list-style-type: none"> 1. distinguish the National Grid from electricity distribution lines on the basis that different provisions apply to the different types of infrastructure and it is helpful to plan users for this to be shown on the planning maps; 2. make it clear that the National Grid Yard provisions are an existing qualifying matter; and 3. include a notation/cross reference to indicate that the extent of the National Grid Yard shown on the planning maps is indicative only, with the Yard being defined by the rules in the District Plan. 	
Planning Maps: National Grid Subdivision Corridor	Oppose	Transpower opposes the Planning Maps to the extent that they do not appear to show the National Grid Subdivision Corridor (or the area subject to Rule 8.5.1.3 RD5). Transpower seeks that the Planning Maps be amended to also show this area in a similar manner to the National Grid Yard (as amended by this submission).	

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Carlin

Last name:



Rutherford

Organisation:

Rutherford Family Trust

Preferred method of contact

Attached Documents

Name	
C Rutherford - Email	
C Rutherford - 2023 05 12 Submission	

Jackson, Andrew

From: Carlin Rutherford <carlinrutherford@gmail.com>
Sent: Friday, 12 May 2023 4:34 pm
To: Engagement
Subject: Submission on Plan Change 14
Attachments: 2023 05 12 Submission.pdf

Submission on Plan Change 14 attached

Regards
Carlin

Carlin Rutherford

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Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

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

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

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

* Required information

Name* Carlin Rutherford

Address* PO Box 1959, Christchurch Postcode* 8014

Email carlinrutherford@gmail.com

Phone no. _____

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

Organisation's name Rutherford Family Trust

Your role _____

Trade competition and adverse effects* (select appropriate)

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

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

(a) adversely affects the environment, and

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

☐ Yes ☐ No

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

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

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

☒ I wish to speak in support of my submission on Plan Change 14

☐ I do not wish to speak.

Joint submissions (Please tick this box if you agree)

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

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

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

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

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

Signature 

Date 12 May 2023



Have your say

Housing and Business Choice Plan Change 14

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

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

Planning Map 48;	14.7.2.1(ii)
8.6.1	
Appendix 8.10.7	
8.6.11 (b)(iv)	
8.6.11 Table 8 (D)	Refer to attached table for more detail

My submission is that:*

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

Refer to attached sheet

I seek the following decision from the Council:*

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

Refer to attached sheet



Plan Section	Support/ Oppose/ Seek amendment	My submission is that	I seek the following Decision from Council
8 and 14 and Planning map 48 More particularly:	Seek Amendment	<p>Land: 2 Crest Lane, Mount Pleasant (Planning Map 48) (including Part Lot 48 Deposited Plan 3416, Lots 1,2, and 3 DP 6740, Lot 2 DP 334935)</p> <p>Submission point #1: Confirm removal of Moncks Spur/Mt Pleasant Overlay and related (as such lack justification as qualifying matters).</p> <p>We support that the overlay has been removed from the interactive Maps (<i>However, reference to it still needs removed elsewhere in the rules</i>).</p> <p>CCC have confirmed to us that it is the intention the Moncks Spur/Mt Pleasant overlay be removed. Further, in the Section 32 Evaluation Report (Part 3 – Residential, pages 79 & 84)), the CCC confirm the Moncks Spur/Mt Pleasant Density Overlay lacked justification as a qualifying matter.</p> <p>We seek the following:</p> <ol style="list-style-type: none"> 1. Remove Moncks Spur/Mt Pleasant Overlay from Map 48. 2. Remove reference to the Moncks Spur/Mt Pleasant Overlay from rule 14.7.2.1 (ii). 3. Remove Additional Standard (b) from Table 1, line (i) in 8.6.1 4. Remove appendix 8.10.7 (refer 3.5.2, SECTION 32 Evaluation: Enabling Greater Building Development In Residential Areas, Moncks Spur DP to be deleted). 5. Remove reference to the Moncks Spur Development Area in 8.6.11 (b)(iv) 6. Remove Row (D) in table 8 in Rule 8.6.11 (d). <p>All of which lack justification as qualifying matters, or prevent development in accord with the standard residential controls, or otherwise restrict flexibility to achieve the NPS-UD objectives. They are no longer appropriate in light of the NPS-UD objectives.</p>	<p>Remove the Moncks Spur/Mt Pleasant Overlay (including reference to it on Planning Map 48)</p> <p>Remove the reference to the Moncks Spur/Mt Pleasant Overlay in 14.7.2.1(ii).</p> <p>Remove Additional Standard (b) from Table 1, line (i) in 8.6.1,</p> <p>Remove appendix 8.10.7.</p> <p>Remove reference to the Moncks Spur Development Area in 8.6.11 (b)(iv)</p> <p>Remove Row (D) in table 8 in Rule 8.6.11 (d).</p>
8 14 Planning Map 48	Seek Amendment	<p>Submission point #2: Enable Housing Choice on the land as per the NPS-UD.</p> <p>Where the land is marked FUZ (<i>“the Middle Land”</i>), we support the recognition of the suitability of this land for Enabling Housing and Housing Choice to help achieve NPS-UD (after removal of density overlays & RH Precinct site limit). Appropriate services can be provided on this greenfield’s block from the outset to achieve housing choice and a range of smaller section sizes where appropriate to suit the changing needs of the population. For example, a number of 400sqm sites for people at a stage of their lives wanting to stay on the hill but not maintain a large garden. People will therefore be able to remain within the neighbourhood throughout their lifetime as they move to housing types that suit their life stage.</p> <p>Alternatively, if the Middle Land remains as the earlier underlying RH (and rules referred to in 1-6 in our submission point 1 herein removed), such would in assist to help accord with NPS-UD; together with other mechanisms that better enable housing and housing choice in accord with the Government’s mandate in the Enabling Act.</p> <p>We also seek to address any other consequential amendments that effect the subject property and its ability to best effect the NPS-UD</p>	<p>Ensure the zoning of the Land optimally provides for Enabling Housing and Housing Choice to better accord with NPS-UD objectives</p> <p>Subject to materials to be presented, solutions may include:</p> <p>Correct the zoning of the Middle Land to RH (together with removal of the provisions in referred to in rules referred to in 1-6 in our submission point #1 herein); together with mechanisms that ensure the Land provides for Enabling Housing and Housing Choice to better accord with NPS-UD objectives.</p> <p>OR to better achieve the objectives under NPS-UD, apply FUZ to the Middle Land, but in a manner that increases the density from RH, and enables a variety of some smaller section sizes e.g. 400sqm where appropriate, to allow housing choice as required by NPS-UD.</p>
Planning Map 48	Seek Amendment	<p>Submission #3: We support not having the LPTAA over the Land.</p> <p>LPTAA is showing over part of the residential property.</p>	Remove LPTAA from the property

Extract HOUSING AND BUSINESS CHOICE – PART 3: RESIDENTIAL SUB-CHAPTER EVALUATION REPORT (pages 79,84)

Moncks Spur/Mt Pleasant Density Overlay	<ul style="list-style-type: none"> • Underlying zone is Residential Hills. • Density required per residential unit is 850m². This site is stated as having been subject to the LHA zoning (deferred) under the previous plan, which had a minimum net site area of 850m² and a minimum average of 1500m². It was recommended that the site be zoned RH with a density overlay.²⁴ It therefore appears that the 850m² minimum area was rolled over from the previous Plan. • In the previous District Plan, the densities for this area are described as being applied <i>"to minimise the visual effects of urban development and maintain the character of the adjacent residential area."</i>²⁵ • Criteria used does not align with sub-sections a) to g) of s77I, therefore cannot be a qualifying matter without meeting the tests under s77J.
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To summarise, those shown in **bold** are considered to be within a relevant residential zone where progressing with the density overlay would have an influence upon density (and are not considered redundant). These can be categorised as follows:

Overlays that lack justification as a qualifying matter (qualifying matter sites):

- **Monks Spur/Mt Pleasant Density Overlay**
- **Shalamar Drive Density Overlay**
- **Upper Kennedys Bush Density Overlay**

Submitter Details

First name: Fiona

Last name: Aston

Organisation: Cathedral City Development Ltd

Preferred method of contact

Attached Documents

Name
Cathedral City Developments PC14 submission



Submission on Proposed Plan Change 14 - Housing and Business Choice

Cathedral City Development Ltd

Christchurch City Council

RESOURCE MANAGEMENT ACT 1991

CHRISTCHURCH CITY COUNCIL

SUBMISSION ON PLAN CHANGE 14 HOUSING AND BUSINESS CHOICE

Submitter Details

Name: Cathedral City Development Ltd

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Resource Management and Planning
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Phone Number: 03 3322618

Mobile Number: 0275 332213

Contact Person Fiona Aston

We do wish to be heard in relation to our submission.

Specific Proposals to Which this Submission Applies:

Proposed Plan Change 14 (PC14) in its entirety, including but not limited to zoning, qualifying matters, and activity and built form standards, in particular as they affect 85 Harry Ell Drive, Cashmere Hills, legally described as Pt Lot 1 DP 11796 (6.8ha)

PPC 14 – Zoning & Qualifying Matters

Zoning

PPC14 essentially proposes 'upzoning' all of the existing residential zones in the Christchurch District Plan except for the Large Lot Residential and Small Settlement Zones and where qualifying matters apply. It implements the Resource Management Enabling Housing Amendment Act 2021 (the Enabling Act), but with an amendment to the Height in Relation to Boundary rule (for which a proposed qualifying matter applies). S 77G of the Act states that:

(4) in carrying out its functions under this section, a specified territorial authority may create new residential

zones or amend existing residential zones

It contemplates rezonings under an IPI, where the outcome is residential.

Low Public Transport Accessibility

A Quality Matter relates to areas with low public transport accessibility where the Residential Suburban Zone, Residential Banks Peninsula and Residential Hills Zone and their current standards in the District Plan continue to apply. This limits the application of the Medium Density Residential Zone (and the MDRS standards) to residential areas with the following spatial characteristics:

- Residential areas within 800m walk from five High Frequency (Core) Routes
- Residential areas within 800m walk from additional bus routes with significant potential to connect employment centres together
- Residential areas more than 200m from High Density Residential Zones and the application of Policy 3 in relation to centres, snapping to the nearest city block
- Areas zoned Residential Suburban Density Transition Zone, Residential New Neighbourhoods (RNNZ) and Residential Medium Density¹

Based on the PPC14 planning maps, parts of the operative NNZ have been rezoned Future Urban Zone. The MDRS do not apply to the FUZ which retains the operative NNZ standards. These require a minimum net residential density of 15 hh/ha, and minimum lot size 300m², except that up to 20% can be between 180-299m² in area.

The justification for the Low Public Transport Accessibility Qualifying Matter (LPTA QM) is summarized as below:

This qualifying matter will provide for a level of intensification within the qualifying matter area consistent with the level of existing and likely future accessibility to employment, education and community services in these areas and promote an integrated and more efficient and effective approach to the provision of public transport and three waters network infrastructure focussed on areas most suited to enable intensification close to centres and areas with relatively strong demand. It will support well-functioning urban environments reductions in greenhouse gas emissions and support resilience to climate change effects without significantly impacting on housing affordability and competitive land and development markets.²

¹ Qualifying Matters Section 32 Assessment paragraph 6.32.1

² Qualifying Matters Section 32 Assessment paragraph 6.32.49

It aligns the location of medium density development with existing and committed structural investments and cross organisational planning for the provision of public transport in Greater Christchurch, including as set out in the Greater Christchurch Public Transport Combined Business Case 2020 (the PT Combined Business Case).³

The LPTA QM is opposed, as contrary to the intent and purpose of the Enabling Act and National Policy Statement – Urban Development 2020. It will frustrate the overall intent and purpose of the the legislation and NPS-UD to facilitate the deliver of increased housing supply and quality urban environments, by substantially restricting the opportunities for intensification.

Relief Sought

- 1) Delete the notified PC14 LPTA QM and all related provisions.
- 2) Rezone 85 Harry Ell Drive MDR as identified on Figure 1 below and legally described as Pt Lot 1 DP 11796 (6.8ha) Medium Density Residential or Future Urban Zone.

³ Qualifying Matters Section 32 Assessment paragraph 6.32.11

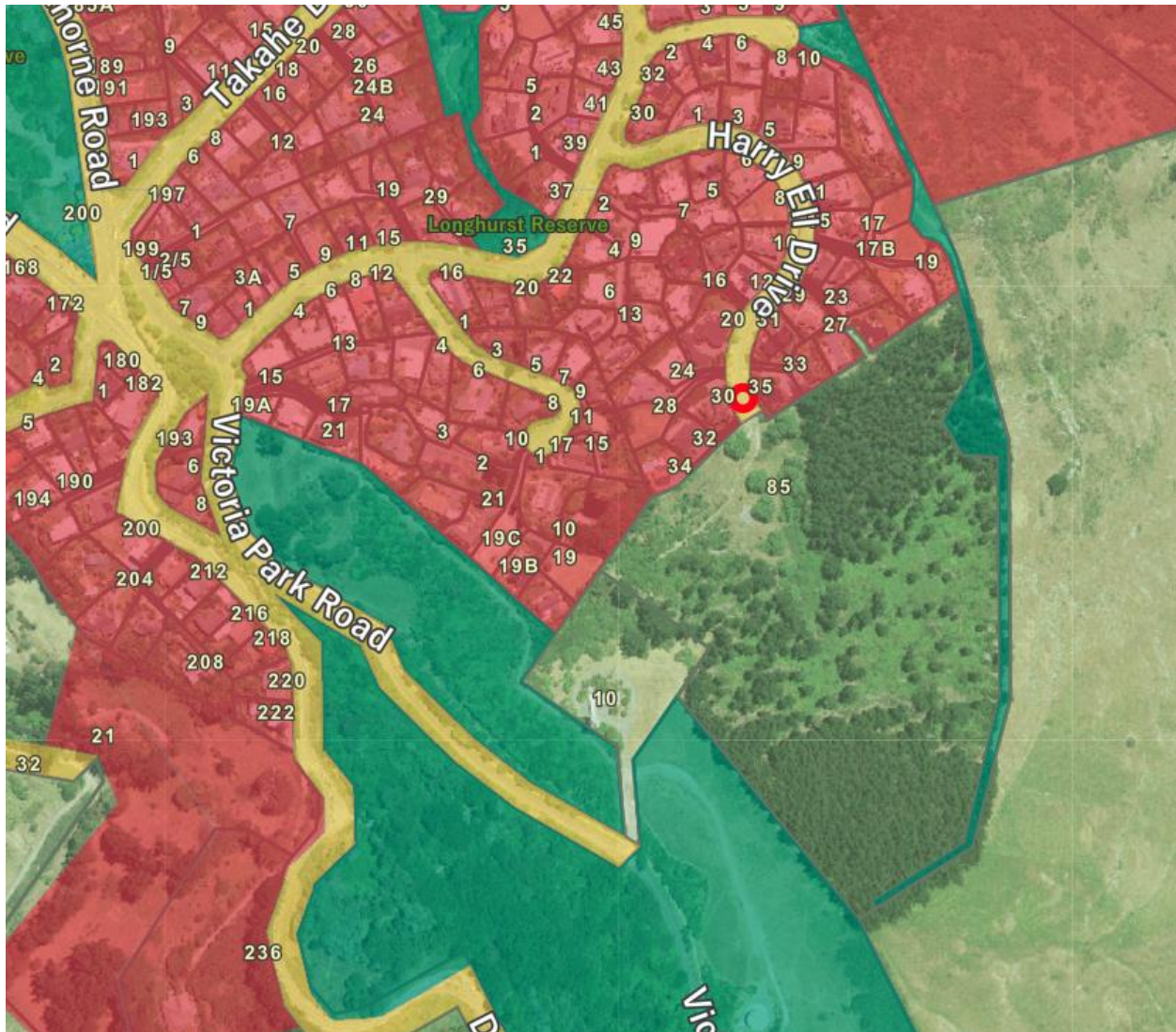


Figure 1: Land at 85 Harry Ell Drive proposed to be rezoned (land coloured red currently zoned for urban residential purposes)

- 3) All consequential, further or alternative amendments to PPC14 to be consistent with and give effect to the intent of this submission and the interests of the Submitter, including but not limited to amendments to Chapter 6.1A Qualifying Matters, Chapter 8 Subdivision, Development and Earthworks, Chapter 14 Residential, and addition of an Outline Development Plan for the area sought to be rezoned by this submission.

A handwritten signature in black ink, appearing to read "T. D. A. A.", enclosed within a thin black rectangular border.

.....
(Signature of applicant or person authorized to sign on behalf of the applicant)

Date: May 12, 2023

Submitter Details

First name: Fiona

Last name: Aston

Organisation: Red Spur Ltd

Preferred method of contact	Email
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Attached Documents

Name
final notified PPC14 Red Spur submission



Submission on Proposed Plan Change 14 - Housing and Business Choice

Red Spur Ltd

Christchurch City Council

RESOURCE MANAGEMENT ACT 1991

CHRISTCHURCH CITY COUNCIL

SUBMISSION ON PLAN CHANGE 14 HOUSING AND BUSINESS CHOICE

Submitter Details

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Resource Management and Planning
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Christchurch 8140

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Phone Number: 03 3322618

Mobile Number: 027 5332213

Contact Person Fiona Aston

Specific Proposals to Which this Submission Applies:

Proposed Plan Change 14 (PC14) in its entirety, including but not limited to zoning, subdivision, activity and built form standards, qualifying matters and tree canopy provisions, in particular as they affect Redmund Spur. For background and context see Attachment 1 to this submission.

Submission:

Opposes the following proposed provisions

PC14 in its entirety, including but not limited to zoning, activity, subdivision, built standards and qualifying matters, in particular as they affect Redmund Spur, and in particular the proposed 'downzoning' of Redmund Spur to LLR.

We do wish to be heard in support of our submission

The decision the Submitter seeks from the Council is:

Relief Sought

- A** If the proposed Low Public Transport Accessibility Qualifying Matter (LPTA QM) is retained in the P14 decision, zone Redmund Spur (except for the Neighbourhood Centre), Residential Hills (the current zoning of the Site) subject to the operative RH zone provisions, except that the RH (Redmund Spur) Precinct provisions as described below shall apply.
- B** If the LPTA QM is **not** retained in the PC14 decision, rezone Redmund Spur MDR and subject to the RH (Redmund Spur) Precinct provisions below.
- C** PC14 rules and other provisions are consistent with the requirements of the Resource Management Enabling Housing (and other matters) Amendment Act, including but not limited to Clauses 3-8 relating to subdivision, including the requirement for subdivision provisions to be consistent with the level of development permitted under the other clauses of Schedule 3A, and provide for subdivision applications as a controlled activity.

In both cases, subject to C above, add the RH (Redmund Spur) Precinct Provisions:

- a minimum vacant lot size for a maximum of 15% of lots for the entire Redmund Spur of 400m²; and
- for the balance lots, a minimum vacant lot size of 650m²
- for lots under 650m² net area, a maximum site coverage of 50%

For clarity, there shall be no other additional rules (I.e. in addition to the RH/MDRZ rules) in the RH (Redmund Spur) Precinct.

Give effect to the above by amending PPC14 as below. Amendments sought by submitter highlighted yellow.

Chapter 8 Subdivision

Rule 8.6.1 Minimum net site area and dimension

	Zone	Minimum net site area	Additional standards
b.	Residential Hills/Medium Density Residential Zone –	650m² for a vacant allotment except that in the Residential Hills (Redmund Spur) Precinct, a	a. An identified building area must be shown on the scheme plan of subdivision on every

	Residential Hills Precinct	maximum of 15% of vacant lots for the entire Precinct shall have a minimum lot size of 400m².	allotment on which a residential unit is anticipated
h.	Residential Large Lot Residential	1500m ²	e. In the Residential Mixed Density Precinct – Redmund Spur: i. the minimum allotment size shall be 650m² ; however a minimum of 30% of sites shall have a minimum of 1,500m² ; and ii. the maximum number of allotments shall be 400.

Rule 8.6.2 Allotments with existing or proposed buildings

	<u>Zone</u>	<u>Minimum net site area</u>
j.	Residential Hills/ Medium Density Residential Zone - Residential Hills (Redmund Spur) Precinct	No minimum

Chapter 14 Residential

Delete the reference to Redmund Spur in the Large Lot Zone Description (14.2.1.1 Policy – Housing distribution and density, Table 14.2.1.1a) as below

Covers a number of areas on the Port Hills where there is an existing residential settlement that has a predominantly low density or semi-rural character as well as the Akaroa Hills slopes and rural residential areas of Samarang Bay and Allandale on Banks Peninsula, **and a low density hamlet centred on the northern part of Gardiners Road, Redmund Spur, and 86 Bridle Path Road.**

Correct Table 14.2.1.1a Residential Hills zone description to include the current operative RH zones west of Westmorland as below

Covers all the living environments that are located on the slopes of the Port Hills from **Westmorland Quarry Hill** in the west to Scarborough in the east.

Consequential amendments to Table 14.2.1.1a if the LPTA QM is not retained or is amended including to the zone description for the RHZ (which for the most part will be zoned MDR).

Delete 14.2.5.11 Policy – managing site specific Residential Large Lot development a. ii (which refers to the Redmund Spur area) as below

14.2.5.11 Policy – Managing site-specific Residential Large Lot development

a. Enable development within mixed density precincts in a way that:...

~~ii. Within the Redmund Spur area, provides for a mixture of low-density residential and rural residential living opportunities; and~~

Residential Hills Zone Rules:

14.7.2.1 Site Density

	Activity/Area	Standard
iii	Residential Hills/MDRZ (Redmund Spur Precinct)	No minimum

14.7.2.3 Site coverage

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

	Activity/Area	Standard
iv.	Within the Residential Hills (Redmund Spur Precinct)	Sites under 650m² net site area – 50%

14.7.1.3 Restricted discretionary activities

	Activity	The Council's discretion shall be limited to the following matters
RD20	a. Within the Residential Hills Mixed Density Overlay, any activity that does not meet Rule 14.7.2.1 Site density. b. Any application arising from this rule shall not be limited or publicly notified.	a. Scale and nature of activity – Rule 14.15.5 b. Traffic generation and access safety – Rule 14.15.6 12 c. Residential design principles – Rule 14.15.1.g Hillside and small settlement areas (Plan Change 5D Council Decision)
RD21	a. Within the Residential Hills Mixed Density Overlay, the creation of any attached residential units where the total floor area is greater than 500m² b. Any application arising from this rule shall not be limited or publicly notified	a. Residential design principles – Rule 14.15.1

Residential Large Lot Zone Rules:

14.9.2.1 Site **and precinct** density

a. Each residential unit shall be contained within its own separate site. The site shall have a minimum net site area as follows:

	Area	Standard
viii.	Residential Mixed Density Precinct Redmund Spur	1. 650m² per residential unit. 2. The maximum number of lots shall be 400. 3. A minimum of 30% of sites shall have a minimum net site area of 1500m².

14.9.2.3 Site coverage

~~b~~ **a.** The maximum percentage of the net site area covered by buildings shall be as follows:

	Zone/activity	Standard
viii.	Residential Mixed Density Precinct Redmund Spur	1. For sites greater than 1000m² – 25% or 250m² of ground floor area to a maximum of 350m² in total floor area. 2. For sites less than 450m² the maximum site coverage shall be 45%

14.9.2.5 Minimum building setbacks from internal boundaries

a. The minimum building setback from internal boundaries shall be as follows:	Activity/area
viii.	Within the Residential Mixed Density Precinct – 86 Bridle Path Road, Residential Mixed Density Precinct – Redmund Spur , and Rural Hamlet Precinct, the following standards apply:

14.9.2.6 Road boundary building setback

a. The minimum road boundary building setback shall be:

	Area	Standard
vii.	Within the Residential Mixed Density Precinct – 86 Bridle Path Road, Residential Mixed Density Precinct – Redmund Spur	4 metres

b. The following exemptions apply for the Residential Mixed Density Precinct – 86 Bridle Path Road, Residential Mixed Density Precinct – Redmund Spur, and Rural Hamlet Precinct:

14.9.2.10 Minimum setback for living area windows and balconies facing internal boundaries

a. Within the Residential Mixed Density Precinct – 86 Bridle Path Road, Residential Mixed Density Precinct – Redmund Spur, and Rural Hamlet Precinct, the following standards apply:

i. The minimum setback for living area windows and balconies at first floor from an internal boundary shall be 4 metres.

ii. Where the window is adjacent to an access way, the setback shall be measured from the far side of the access way.

14.9.2.11 Service, storage and waste management spaces

a. Within the Residential Mixed Density Precinct – 86 Bridle Path Road, Residential Mixed Density Precinct – Redmund Spur, and Rural Hamlet Precinct, for multi-unit residential complexes and social housing complexes:

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 i. and/or ii. for each residential unit shall be provided either individually, or within a dedicated shared communal space.

14.9.2.12 Street scene amenity and safety – fences

a. Within the Residential Mixed Density Precinct – 86 Bridle Path Road, Residential Mixed Density Precinct – Redmund Spur, and Rural Hamlet Precinct, for multi-unit residential complexes and social housing complexes:

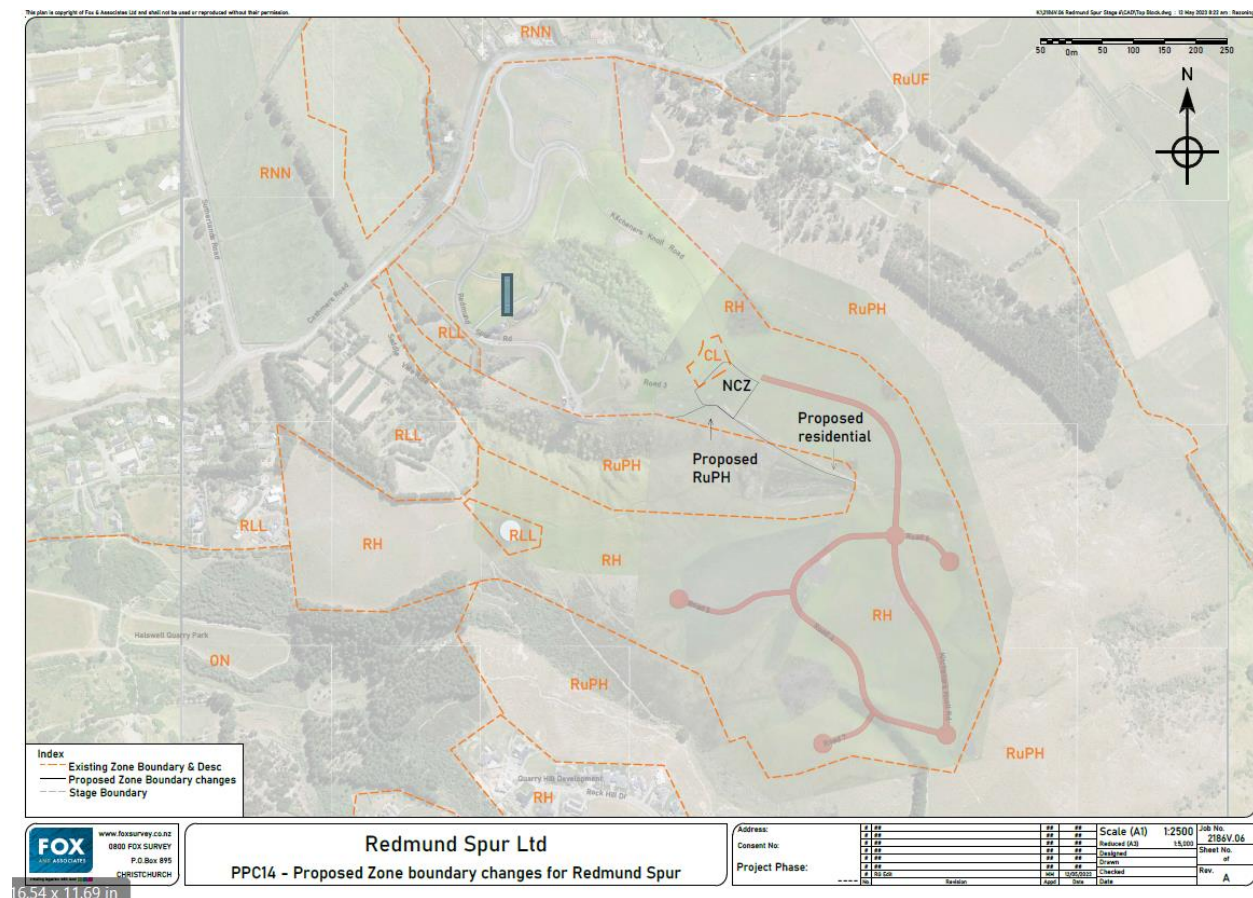
i. The maximum height of any fence in the required building setback from a road boundary shall be 1.8 metres.

ii. This rule shall not apply to fences or other screening structures located on an internal boundary between two properties zoned residential, or residential and commercial or industrial.

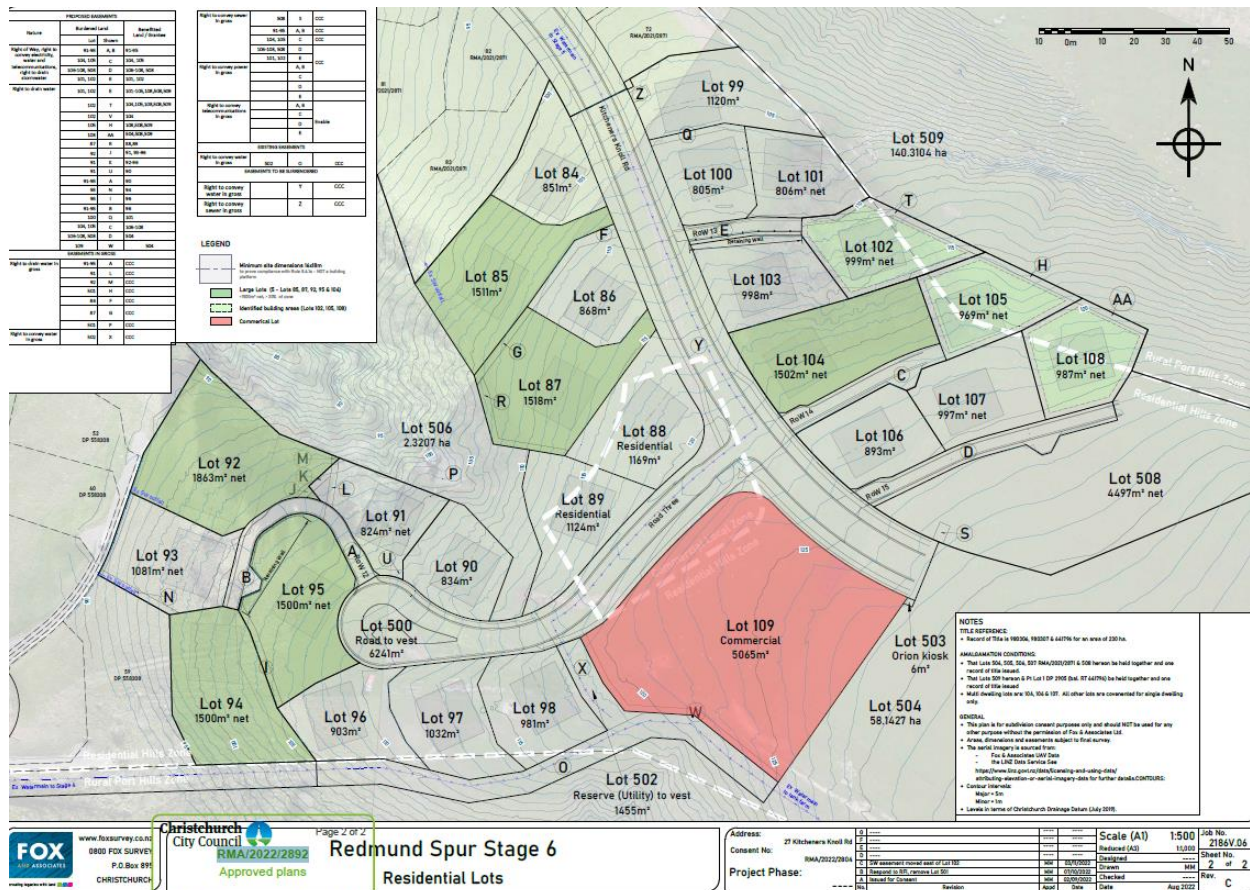
iii. For the purposes of this rule, a fence or other screening structure is not the exterior wall of a building or accessory building.

Support Redmund Spur Neighbourhood Centre subject to retention of Rule 5.6.1.1. P21 and for clarity change reference in a. from 'local centres' to 'neighbourhood centres'.

Amend the residential zone boundaries of Redmund Spur as shown on the map below i.e rezone the areas identified as B.1 – B.4 to Residential Hills/ Medium Density Residential (Redmund Spur Precinct); and rezone the areas identified as A.1 – A.2 to Rural Port Hills.



Amend the location of the Redmund Spur Neighbourhood Centre on the relevant planning maps and Table 15.1 below to be consistent with the location and size of the NC approved under Stage 6 subdivision consent (RMA/2022/2892) as below.



Amend 15.2.2.1 Policy – Role of centres Table 15.1 – Centre’s role as below:

	Role	Centre and size (where relevant)
E		All other commercial centres zoned Commercial Local Neighbourhood Centre Zone. Size: Up to 3,000m ² <u>(excluding Redmund Spur)</u> <u>Redmund Spur – 5100m²</u>

Any consequential, further or alternative amendments to PPC14 to be consistent with and give effect to the intent of this submission and the interests of the Submitter.

Reasons for Relief Sought

- 1) The relief sought is consistent with and gives effect to the Resource Management Act 1991 (RMA), including the Enabling Housing (and other matters) amendments, and in terms of s32 of the RMA is the most appropriate way for achieving the purpose of the objectives of the proposal (including any consequential amendments to the same to give effect to the purpose and intent of this submission).
- 2) Redmund Spur is zoned RH in the current operative Christchurch District Plan. The Enabling Act requires all existing zones except LLR and SSZ to incorporate the MDRS. The proposal to 'downzone' Redmund Spur to LLR is contrary to the Enabling Act and not legally possible. There is simply no scope under the Act for the proposed downzoning.
- 3) The existing District Plan density provisions applying to the Redmund Spur Overlay enable an overall residential density 'closer' to the RH zoning applying elsewhere (minimum lot size 650m²) than the LLR zone (minimum lot size 1500m²). The average lot size based on a maximum of 400 lots, and minimum 30% 1500m² is appx 900m².
- 4) RH zoning for Redmund Spur (in the event that the LPTA QM is retained) is consistent with the proposed RH zoning for the neighbouring Quarry Hill subdivision to the west, which also has an overall lower average density (1500m²) than Redmund Spur (appx 900m²).
- 5) The topography of Redmund Spur includes large areas of gently sloping land which are suitable for some smaller lots. The existing operative RS Mixed Density Overlay rules package recognizes this and anticipates some smaller sites. A higher (45%) site coverage applies for smaller sites (under 450m²) - Rule 14.7.2.3 Site Coverage. Provision for smaller lots will enable this emerging hill suburb to deliver a wider range housing types and price points than other hills suburbs (where the minimum vacant lot size is 650m²), consistent with the NPS-UD 2020 requirement for well functioning urban environments to meet the needs, in terms of type, price, and location, of different households (Policy 1), including smaller, more affordable housing.
- 6) The amendments to the residential zone boundaries are minor in nature and ensure that

the zoning better fits the site topography than the existing zone boundaries which relate to existing fencelines and/or other non-topographical features. Land currently zoned Residential Hills but which is topographically unsuited for residential development will be rezoned Rural Port Hills (2960m²) and land currently zoned RPH but which is suitable for residential development will be rezoned RH (Redmund Spur Precinct) or MDR (Redmund Spur Precinct) (2100m²) slightly reducing the amount of land zoned for residential purposes.

- 7) The amendments to the NCZ boundary and Table 15.1 is consistent with the approved Stage 6 subdivision scheme plan, and the location of the NCZ approved under RMA/2022/2892.
- 8) There is no need to continue with the current RHMDO rules package, which in some parts is inconsistent with the Enabling Act. These include the requirement for a proportion of larger lots and site coverage requirements including as below
 - For sites greater than 1000m² – the lesser of 25% or 250m² of ground floor area to a maximum of 350m² in total floor area (Rule 14.7.2.3)
 - Restricted discretionary activity consent required for attached residential units where the total floor area is greater than 500m² (RD21)

The site coverage requirements for larger sites have proven problematic in practice, with variable interpretation and application by consenting officers concerning matters of visual appropriateness of site coverage on the larger lots. The maximum site coverage under the MDRS is 50% as stipulated in the Enabling Act, and 35% in the current operative RHZ. It is not appropriate that a different standard apply to development at Redmund Spur compared with other RH zoned areas (with respect to sites 650m² and larger). Further, the Enabling Act (Policy 6) anticipates changes to character of the urban environment with the proposed intensification, which applies to virtually all residential zones including RH. Such changes are not to be considered of themselves an adverse effect, which needs mitigation.

Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:

(b) that the planned urban built form in those RMA planning documents 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

9) Market feedback is that lot sizes of 1500m²+ are larger than desired.

10) The current District Plan RH zoning of Redmund Spur (to apply in the event that the LPTA QM is not retained) is consistent with the purpose and intent of the RHZ as described in the District Plan under Policy 14.2.2.1 Housing distribution and density Table 14.2.1.1a, and conversely inconsistent with the purpose of LLR as described in the Table.

Residential Hills Zone

Covers all the living environments that are located on the slopes of the Port Hills from Westmorland in the west to Scarborough in the east. (an amendment is sought to correct this to reference Quarry Hill as the westernmost RHZ). It provides principally for low density residential development that recognises the landscape values of the Port Hills, including opportunities for planting and landscaping, and control of reflectivity of roof finishes in order to blend buildings into the landscape. Provision is made for a range of housing options that will enable a typical family home to be retained, but also provide greater housing stock for dependent relatives, rental accommodation, and homes more suitable for smaller households (including older persons). Provision is also made for a range of appropriate non-residential activities.

Residential Large Lot Zone

Covers a number of areas on the Port Hills where there is an existing residential settlement that has a predominantly low density or semi-rural character as well as the Akaroa Hillslopes and rural residential areas of Samarang Bay and Allandale on Banks Peninsula , **and a low density hamlet centred on the northern part of Gardiners Road, Redmund Spur, and 86 Bridle Path Road..**

The RLLZs are discrete outlying residential areas on Banks Peninsula or in the rural area north of the city (Gardiners Road). Bridle Path Road has subdivision approval and is being developed as a mixed density area (10 lots). Redmund Spur is not an outlying area – it is a Port Hills hill suburb sandwiched between two existing RH hill suburbs (Westmorland to the east and Quarry Hill to the west). RH/RMD (Redmund Spur Precinct) zoning is

consistent with this setting and context.

- 11) LLR zoning of Redmund Spur is inconsistent with the purpose and intent of LLR zoning as specified in the national planning standards:

LLRZ

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

The current development with average lot sizes of around 900m² is not low density. There are few physical limitations or constraints to development of RHZ areas on the balance of the site.

Significant parts of Redmund Spur are well suited to more intensive development, as reflected in the current MDO rules which anticipate higher density development.

- 12) MDR zoning of Redmund Spur is consistent with the Intensification objectives and policies that the Enabling Act required to be included in the District Plan in particular

Objective 1

(a) 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:

Objective 2

(b) a relevant residential zone provides for a variety of housing types and sizes that respond to—

(i) housing needs and demand; and

(ii) the neighbourhood's planned urban built character, including 3-storey buildings.

(2)

A territorial authority must include the following policies in its district plan:

Policy 1

(a) enable a variety of housing types with a mix of densities within the zone, including 3-storey attached and detached dwellings, and low-rise apartments:

Policy 2

(b) apply the MDRS across all relevant residential zones in the district plan except in circumstances where a qualifying matter is relevant (including matters of significance such as historic heritage and the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi

tapu, and other taonga):

- 13) Amended Rule 5.6.1.1 P21 will retain the status quo with respect to the approved zoning of the proposed Redmund Spur neighbourhood centre. The next development stage (Stage 6) will include the neighbourhood centre, which is currently being designed.

Relief Sought – Tree Canopy Cover

The submitter supports the exclusion of Redmund Spur from the Operative Christchurch District Plan and PC14 definitions of greenfield and brownfield areas, which by definition exclude Redmund Spur and are referenced in 6.10A.2.1.1 Policy – Contribution to tree canopy cover and 6.10A.4.1.1 Permitted activities P2.

In all other respects, the Submitter opposes the tree canopy cover provisions in their entirety.

If the tree canopy provisions are retained in the PC14 decision, an element of an alternative, more workable approach should include the option of providing tree canopy off site, but within the wider subdivision area or elsewhere e.g. for a hill subdivision, protection of existing trees in gully areas which are not appropriate to develop, are suited to tree growth (wetter conditions) and where tree growth helps stabilize soils and reduce risk of erosion.

Reasons for Submission – Tree Canopy Cover

1. The relief sought is consistent with and gives effect to the Resource Management Act 1991 (RMA), and in terms of s32 of the RMA is the most appropriate way for achieving the purpose of the objectives of the proposal (including any consequential amendments to the same to give effect to the purpose and intent of this submission).
2. The Submitter supports existing urban areas, including Redmund Spur in its entirety, as being excluded from the tree canopy requirements with respect to greenfield and brownfield development road reserve areas.
3. In all other respects the PC14 tree canopy cover provisions are impractical and unworkable and will adversely affect the feasibility and take up of housing development opportunities including intensification enabled by PPC14 and the current District Plan. The outcomes will be contrary to the intent of the RMA including the RM Enabling Housing Amendment Act in enabling increased housing choice and affordability which contributes to a well functioning urban environment.

A handwritten signature in black ink, appearing to read "T. D. A. A.", enclosed within a thin black rectangular border.

.....
(Signature of applicant or person authorized to sign on behalf of the applicant)

Date: May 12, 2023

ATTACHMENT 1: BACKGROUND AND CONTEXT

Background – Submitter and Zoning

The Submitter, Red Spur Ltd (Red Spur), owns land at Redmund Spur, Halswell. An associated company has also developed Quarry Hill which is a neighbouring Upper Kennedys Bush subdivision, comprising 100 sections, with lot sizes in the 850m² to 2400m² size range, approved under the previous City Plan LHA zone provisions (minimum net site area 850m², minimum average 1500m²).

The two subdivisions are separated by a band of Rural H zoned land also owned by associated interests and part of a larger balance Rural H zoned area (totaling appx 250 ha). The Halswell Quarry Park is on the west boundary of the properties.

Red Spur is now developing Redmund Spur - see <https://www.redmundspur.co.nz/>. Stages 1-6 (116 lots) are now complete or consented with lot sizes in the appx 450m² to 5000m² range. Later stages are anticipated, including some lots in the 280m² – 450m² size range.

Both Upper Kennedys Bush and Redmund Spur are zoned Residential Hills in the Christchurch District Plan.

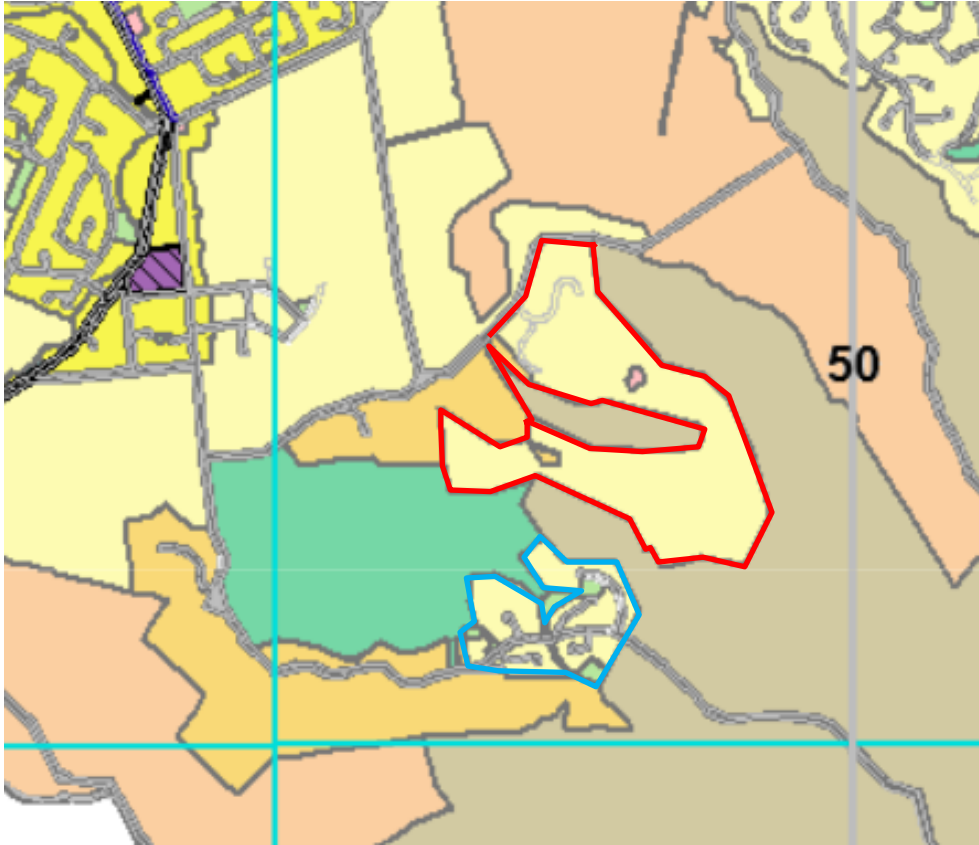


Figure 1: Zoning Map – Christchurch District Plan

Redmund Spur outlined in red; Upper Kennedys Bush outlined in blue.

Light yellow – Residential Hills; Mustard yellow – Residential Large Lot

Under the current provisions Redmund Spur is subject to a 'Mixed Density Overlay' (MDO) which specifies

- The maximum number of allotments shall be 400.
- A minimum of 30% of sites shall have a minimum net site area of 1500m²

There is no minimum lot size.

The MDO was introduced in the Christchurch District Plan. The anticipated section mix based on the MDO is

- 15% 200-650m²
- 55% 650-1500m²
- 30% 1500m²+

The MDO takes its 'cue' from the existing Cashmere Hills suburb which is a very attractive high

amenity suburb. It provides for a wide range of section sizes and housing types, ranging from townhouses and apartments to substantial homes on larger sites and an overall 'leafy' feel. A local neighbourhood centre is zoned at Redmund Spur positioned in a similar position at a local roads intersection with north facing views to plains and Alps to the café/bar cluster, gift shop and florist at the Dyers Pass/Hackthorne Road intersection on Cashmere Hill.

There is only one other equivalent MDO in the Residential Hills, at 86 Bridle Path Road, Heathcote. This provides for up to 9 lots. Development is underway there. Consent has been obtained for a 10 lot subdivision.

Redmund Spur is particularly suited to a some medium density development because it includes substantial areas of flatter north facing land suitable for higher density development. This provides added housing choice, including smaller more affordable housing, in accordance with the intent of PPC14, and is currently one of only two locations on the Residential Hills where higher density development can occur. There is no minimum lot size under the residential density standard (14.7.2.1 iii) and no minimum lot size applies where an allotment is to be created around an existing building (that has been constructed to the extent that its exterior is fully closed in), or a proposed building where the subdivision consent is to be issued at the same time as, or after, the building consent for that building is issued (8.6.2). The operative site coverage rules for Redmund Spur anticipate some higher density development, with a maximum site coverage of 45% applying to sites under 450m².

The above operative rules have been utilized to enable some smaller lot development at Redmund Spur (appx 11 approved to date).

PPC 14 – Zoning

PPC14 essentially proposes 'upzoning' all of the existing residential zones in the Christchurch District Plan except for the Large Lot Residential and Small Settlement Zones and where qualifying matters apply. The proposed Residential Medium Density Zone enables 3 houses per site, up to 3 storeys high, subject to development standards as specified in the Resource Management Enabling Housing Amendment Act 2021 (the Enabling Act), but with an amendment to the Height in Relation to Boundary rule (for which a proposed qualifying matter applies).

One Qualifying Matter applies to areas with low public transport accessibility where the

Residential Suburban Zone, Residential Banks Peninsula and Residential Hills Zone (part) and their current standards in the District Plan continue to apply. This limits the application of the Medium Density Residential Zone (and the MDRS standards) to residential areas with the following spatial characteristics:

- Residential areas within 800m walk from five High Frequency (Core) Routes
- Residential areas within 800m walk from additional bus routes with significant potential to connect employment centres together
- Residential areas more than 200m from High Density Residential Zones and the application of Policy 3 in relation to centres, snapping to the nearest city block
- Areas zoned Residential Suburban Density Transition Zone, Residential New Neighbourhoods (RNNZ) and Residential Medium Density¹

However, based on the PPC14 planning maps, parts of the operative RNNZ have been rezoned Future Urban Zone. The MDRS does not apply to the FUZ which retains the operative RNNZ standards.

The justification for the Low Public Transport Accessibility Qualifying Matter (LPTA QM) is summarized as below:

This qualifying matter will provide for a level of intensification within the qualifying matter area consistent with the level of existing and likely future accessibility to employment, education and community services in these areas and promote an integrated and more efficient and effective approach to the provision of public transport and three waters network infrastructure focussed on areas most suited to enable intensification close to centres and areas with relatively strong demand. It will support well-functioning urban environments reductions in greenhouse gas emissions and support resilience to climate change effects without significantly impacting on housing affordability and competitive land and development markets.²

It aligns the location of medium density development with existing and committed structural investments and cross organisational planning for the provision of public transport in Greater Christchurch, including as set out in the Greater Christchurch Public Transport Combined Business Case 2020 (the PT Combined Business Case).³

¹ Qualifying Matters Section 32 Assessment paragraph 6.32.1

² Qualifying Matters Section 32 Assessment paragraph 6.32.49

³ Qualifying Matters Section 32 Assessment paragraph 6.32.11

The PPC14 proposed zoning of Redmund Spur and surrounding areas is as below:

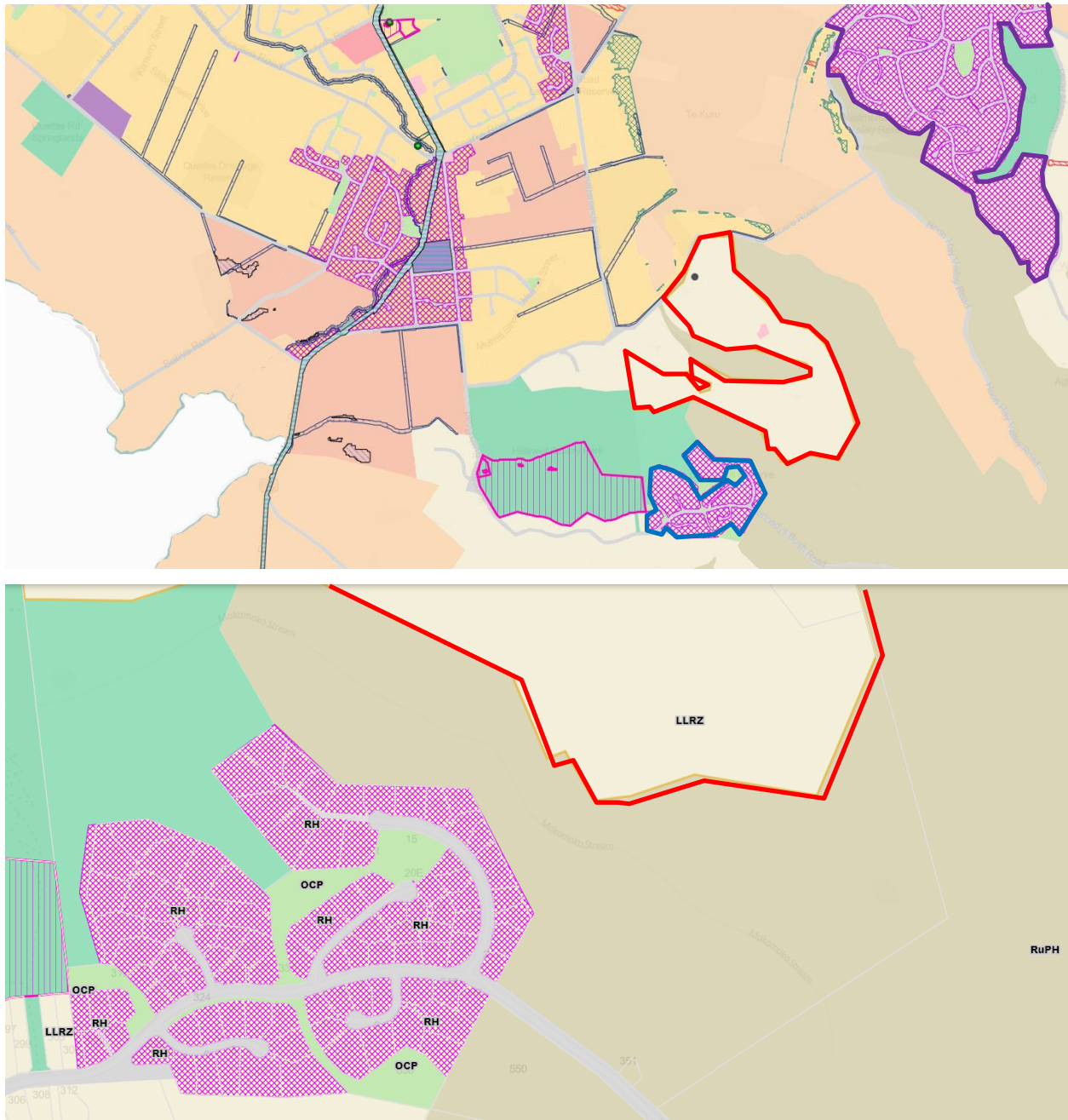
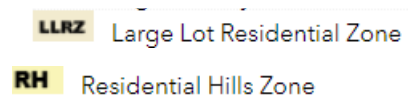


Figure 1: PPC14 planning maps – Redmund Spur and vicinity (Redmund Spur outlined in red, Quarry Hill outline in blue, Westmorland outlined in purple) including close up of Quarry Hill and southern Redmund Spur



RNN	Residential New Neighbourhood Zone
FUZ	Future Urban Zone
RuUF	Rural Urban Fringe Zone
NCZ	Neighbourhood Centre Zone
	Low Public Transport Accessibility Area

PPC14 proposes to 'downzone' Redmund Spur to Large Lot Residential, but retain the existing MDO development standards. The 'downzoning' of Redmund Spur to LLR is opposed.

PPC14 retains the Redmund Spur Commercial Local Centre, but rezones it Neighbourhood Centre to align with the National Planning Standards. Rule 5.6.1.1 P21 as below is retained with some amendments.

With regard to neighbouring land, the land on the north side of Cashmere Road opposite Redmund Spur is zoned MDR, and land within the current RNNZ at south Halswell is zoned FUZ. It is understood that parts of the RNNZ fully or partially developed are zoned MDR. Upper Kennedys Bush and Westmorland are LPTA areas, and retain the current Residential Hills zoning. Further east, Cashmere Estates is zoned FUZ, and lower Cashmere is zoned MDR but middle and upper areas are LPTA areas and retain the current RH zoning.

Tree Canopy Cover

PPC 14 requires a tree canopy cover financial contribution to be paid at the time of subdivision or building consent where a proposed development does not include:

- 20% tree canopy cover within a development site; and
- For residential greenfield and brownfields subdivision, in addition, an additional 15% of the future road area to be vested in Council.

The additional 15% requirement for greenfield and brownfields residential subdivision does not apply to Redmund Spur and it is not a greenfield or brownfield area, as defined in the Operative Christchurch District Plan and PC14.

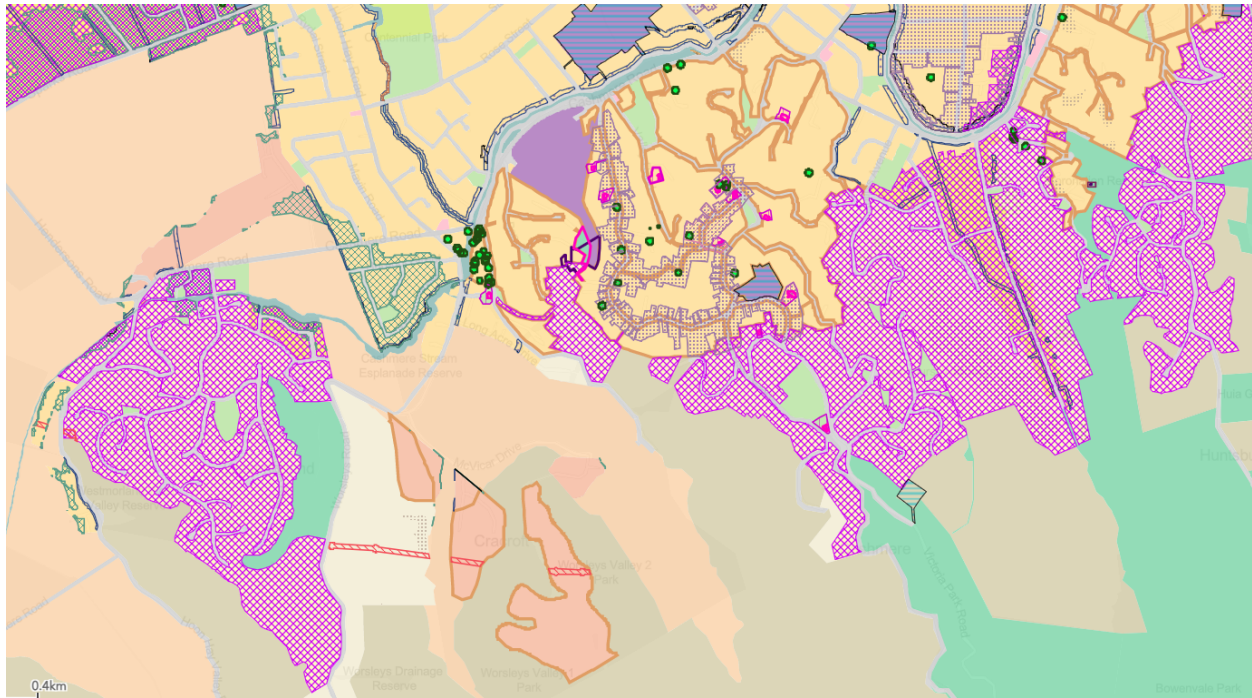


Figure 2: PPC14 planning map – Westmorland, Cashmere Estates, Cashmere and Bowenvale

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details



Submission Date: 12/05/2023

First name: Daniela **Last name:** Bagozzi

Organisation: Latimer Community Housing Trust

Preferred method of contact Email

Attached Documents

Name	
Daniela Bagozzi - Email 1 of 2	
Daniela Bagozzi - Email 2 of 2	

Jackson, Andrew

From: Daniela Bagozzi <d.bagozzi@ext.canterbury.ac.nz>
Sent: Monday, 15 May 2023 10:02 am
To: Engagement
Subject: Re: Feedback on Our proposed Housing and Business Choice Plan Change (PC14) / 531

Thank you so much!

I had copied & pasted it into my email, but I'll copy it and paste it here below:

""Submitter details:

Daniela Bagozzi
 on behalf of Latimer Community Housing Trust
 Suburb: Linwood
 City: Christchurch, NZ
 Postcode: 8011
 Email: d.bagozzi@ext.canterbury.ac.nz
 Daytime phone: 03 3810829

I hereby declare that I will not derive any gain nor trade advantage from any of the matters dealt with in this submission.

The Latimer Community Housing Trust would like to present our submission at a hearing.

1) Specific provisions of the Plan Change that our submission relates to are as follows:

- Financial contributions
- Inclusionary Zoning

2) Our submission is:

The Latimer Community Housing Trust operates in the Inner City East/Linwood area
 The Trust's purpose is to house the most financially stressed renters - single people, couples, single parent families and the working poor, to secure affordable housing and ensure local residents displaced as a consequence of housing intensification can be rehoused in this neighbourhood.

We support the submission of Te Whare Roimata Trust and its recommendations.

3) What we want is to see is an inclusionary Housing Plan which lists within the District Plan along the lines of the Queenstown Lakes Council, which requires developers of new residential housing in the area to make a financial contribution to a fund to be used to provide affordable housing. Such a fund is similar to the contribution developers pay towards protecting our environment."

Regards,

D. Bagozzi

On 15/05/2023, at 9:18 AM, Engagement <engagement@ccc.govt.nz> wrote:

Kia ora Daniela,

Thanks for your email and we appreciate your feedback.

The closing date was 12 May, but please send your submission through email and I can submit for you.

Ngā mihi,

Aviva Cui

Engagement Assistant

Communications and Engagement

Pronouns: she/her

<image001.jpg>

<image002.png> 03 941-6844 | 027 367 1828

<image003.png> Aviva.cui@ccc.govt.nz

<image004.png> Te Hononga Civic Offices, 53 Hereford Street, Christchurch

<image005.png> PO Box 73016, Christchurch 8154

<image006.png> ccc.govt.nz

<image007.png>

<image008.jpg>

From: Daniela Bagozzi <d.bagozzi@ext.canterbury.ac.nz>

Sent: Sunday, 14 May 2023 5:41 pm

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

Subject: Feedback on Our proposed Housing and Business Choice Plan Change (PC14) / 531

We appeared to have had a problem with filing our submission online, and the email addressed we used was apparently either not working or incorrect.

Can we still add our submission by email? (Closing date postponed to 18th May - is that right?)

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Daniela Bagozzi, on behalf of Latimer Community Housing Trust

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Regards,

D. Bagozzi

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

Jackson, Andrew

From: Daniela Bagozzi <d.bagozzi@ext.canterbury.ac.nz>
Sent: Sunday, 14 May 2023 5:41 pm
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 The Trust's purpose is to house the most financially stressed renters - single people, couples, single parent families and the working poor, to secure affordable housing and ensure local residents displaced as a consequence of housing intensification can be rehoused in this neighbourhood.

We support the submission of Te Whare Roimata Trust and its recommendations.

3) What we want is to see is an inclusionary Housing Plan which lists within the District Plan along the lines of the Queenstown Lakes Council, which requires developers of new residential housing in the area to make a financial contribution to a fund to be used to provide affordable housing. Such a fund is similar to the contribution developers pay towards protecting our environment."

Regards,
D. Bagozzi

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Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Fiona

Last name:

Aston


Organisation:

Miles Premises Ltd

Preferred method of contact

Email

Attached Documents

Name	
MILES PC14 submission	



Submission on Proposed Plan Change 14 - Housing and Business Choice

Miles Premises Ltd

Christchurch City Council

RESOURCE MANAGEMENT ACT 1991

CHRISTCHURCH CITY COUNCIL

SUBMISSION ON PLAN CHANGE 14 HOUSING AND BUSINESS CHOICE

Submitter Details

Name: Miles Premises Ltd

Postal address: C/- Aston Consultants Ltd
Resource Management and Planning
PO Box 1435
Christchurch 8140

Email address: fiona@astonconsultants.co.nz

Phone Number: 03 3322618

Mobile Number: 0275 332213

Contact Person Fiona Aston

Specific Proposals to Which this Submission Applies:

Proposed Plan Change 14 (PC14) in its entirety, including but not limited to zoning, qualifying matters, and activity and built form standards, in particular as they affect and other properties located between the current 50 and 57 dBA Ldn Christchurch International Airport (CIAL) Noise Contour.

PPC 14 – Zoning & Qualifying Matters

Zoning

PPC14 essentially proposes 'upzoning' all of the existing residential zones in the Christchurch District Plan except for the Large Lot Residential and Small Settlement Zones and where qualifying matters apply. The proposed Residential Medium Density Zone enables 3 houses per site, up to 3 storeys high, subject to development standards as specified in the Resource Management Enabling Housing Amendment Act 2021 (the Enabling Act), but with an amendment to the Height in Relation to Boundary rule (for which a proposed qualifying matter applies).

Airport Noise Qualifying Matter (QM)

A Qualifying Matter (QM) applies to areas located with the current operative CIAL 50 dBA Ldn noise contour. Intensification of these areas is excluded on the basis that this could result in greater incidence of complaints about airport noise related operations due to the potential for more residents to live in these areas. Applying this QM based on the 50 rather than the 57 dBA Ldn airport noise contour is unnecessarily conservative and out of step with the relevant NZ noise standards (NZS 6802) and international best practice. It results in development restrictions which are not justified on reverse sensitivity grounds.

Other than 'historical' existing urban zoning, the land between the 50 and 57 dBA Ldn noise contours remains zoned Rural Urban Fringe with a minimum lot size of 4 ha for subdivision and a dwelling; or is subject to a form of business zoning which is limited to activities considered not to be sensitive to airport noise. This includes land on the Memorial Avenue/Russley Road corner (400, 475 Memorial Avenue and 500, 520 and 540 Avonhead Road) which is zoned Industrial Park Zone (Memorial Avenue). The land between the current 50-57 dBA Ldn airport noise contours is highly fragmented with existing lots generally 4 ha or smaller (due to historic planning regimes which enabled residential development on smaller lots where supported by, at that time, an economic horticultural use). The rural zoned land is now almost exclusively used for rural lifestyle purposes, and is exempted from the National Policy Statement – Highly Productive Land (NPS-HPL) under Clause 3.5.7 ai) because the nearest equivalent zone is the Rural Lifestyle Zone.

The inappropriateness of retaining the land between the current urban boundary and CIAL 50 and 57 dBA Ldn noise contour in rural zoning/airport noise restricted business zoning was recognized by the Commissioners for Change 1 to the Canterbury Regional Policy (CRPS). In their 2009 recommendation on submissions and further submissions, they identified Special Treatment Areas in their recommended Policy 12 below¹:

Policy 12: Special Treatment Areas

Specific analysis and planning shall be undertaken to achieve the sustainable management of the natural

¹ The extent of the Special Treatment Areas was constrained by the nature of submissions on Change 1 to CRPS, but the principle of considering and reassessing the most appropriate and sustainable management areas currently constrained by airport noise related rules applies to the of the entire constrained NW Christchurch area

and physical resources of the following areas and to meet the stated expectations:

- (a) In Northwest Christchurch (STA1) to determine the medium and long-term sustainable future of the area affected by airport noise.

Methods

12.1 Christchurch City Council shall undertake specific planning investigations in relation to the three Special Treatment Areas by 2012 in conjunction with landowners within the areas and other stakeholders...

12.3 Christchurch City Council shall include appropriate zoning and/or other provisions with the district plan as a result of Method 12.1.

Subsequent planning processes were 'overtaken' by legislative changes and earthquake related processes which followed after the 2010/11 Canterbury earthquakes. The expedited Land Use Recovery Plan (LURP) processes replaced the Commissioners decision on Change 1 to the CRPS, and all appeals, including those in relation to the location of the airport noise constrained land, and the basis for the same, were extinguished. The CRPS has not been reviewed since, so that 'untested' approach to airport noise constraints (which is out of step with national and international standards) remains.

Enabling urban development between the 50 and 57 dBA Ldn contour is consistent with and gives effect to the National Policy Statement – Urban Development (NPS-UD). It will free up land for urban development in a location ideally suited to meeting the Council's obligations to provide at least sufficient development capacity to meet expected demand for land for housing and business and will contribute to a well functioning urban environment.

Low Public Transport Accessibility

A further QM relates to areas with low public transport accessibility where the Residential Suburban Zone, Residential Banks Peninsula and Residential Hills Zone and their current standards in the District Plan continue to apply. This limits the application of the Medium Density Residential Zone (and the MDRS standards) to residential areas with the following spatial characteristics:

- Residential areas within 800m walk from five High Frequency (Core) Routes
- Residential areas within 800m walk from additional bus routes with significant potential to connect employment centres together
- Residential areas more than 200m from High Density Residential Zones and the application of Policy 3 in relation to centres, snapping to the nearest city block

- Areas zoned Residential Suburban Density Transition Zone, Residential New Neighbourhoods (RNNZ) and Residential Medium Density²

Based on the PPC14 planning maps, parts of the operative NNZ have been rezoned Future Urban Zone. The MDRS do not apply to the FUZ which retains the operative NNZ standards. These require a minimum net residential density of 15 hh/ha, and minimum lot size 300m², except that up to 20% can be between 180-299m² in area.

The justification for the Low Public Transport Accessibility Qualifying Matter (LPTA QM) is summarized as below:

This qualifying matter will provide for a level of intensification within the qualifying matter area consistent with the level of existing and likely future accessibility to employment, education and community services in these areas and promote an integrated and more efficient and effective approach to the provision of public transport and three waters network infrastructure focussed on areas most suited to enable intensification close to centres and areas with relatively strong demand. It will support well-functioning urban environments reductions in greenhouse gas emissions and support resilience to climate change effects without significantly impacting on housing affordability and competitive land and development markets.³

It aligns the location of medium density development with existing and committed structural investments and cross organisational planning for the provision of public transport in Greater Christchurch, including as set out in the Greater Christchurch Public Transport Combined Business Case 2020 (the PT Combined Business Case).⁴

Enabling urban including residential and/or non airport noise restricted business development of land within the 50-57 dBA Ldn airport noise contour will provide increased opportunity (additional local population and potential patronage) for improved PT between the central city and the CIAL, a major economic hub.

Relief Sought

Rezone land between the 50 and 57 Ldn CIAL airport noise contour for urban development, with no restrictions relating to airport noise, including the land identified on the aerial photograph below

² Qualifying Matters Section 32 Assessment paragraph 6.32.1

³ Qualifying Matters Section 32 Assessment paragraph 6.32.49

⁴ Qualifying Matters Section 32 Assessment paragraph 6.32.11

ie 400, 475 Memorial Avenue and 500, 520 and 540 Avonhead Road. Rezone/amend the current urban zoning of 400, 475 Memorial Avenue and 500, 520 and 540 Avonhead Road to allow the full range of business and related activities (industrial, office, accommodation, health, community, entertainment, recreation etc) and/or rezone in full or part Future Urban Zone or Medium Density Residential, in all cases with no restrictions in activity type or standards due to airport noise effects.

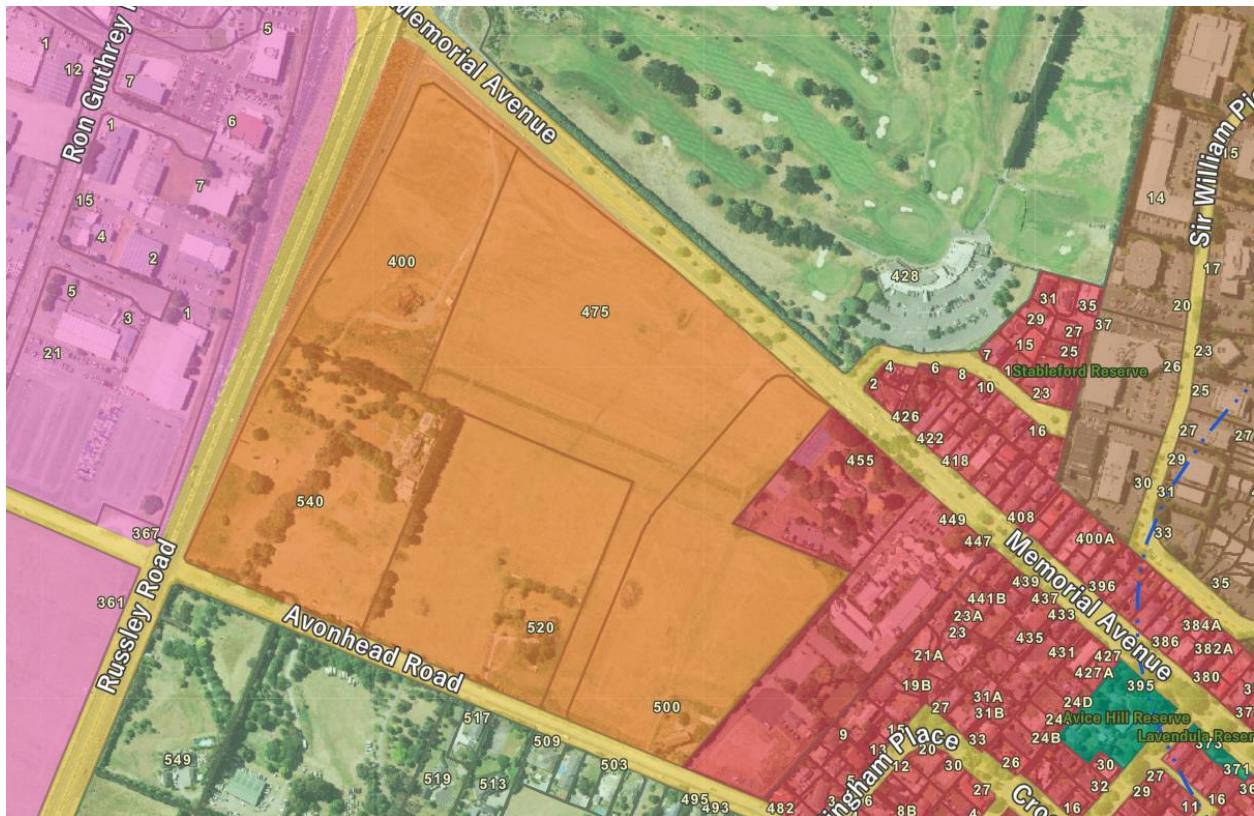


Figure 1: location of specific listed properties in Memorial Avenue and Avonhead Road. Source: Canterbury Maps. Red – existing urban zonings shown in red (residential), orange (Industrial Park – Memorial Avenue) and purple (Special Purpose Zone – Airport); Operative District Plan 50 dBA Ldn airport noise contour shown with blue hatched line.

Amend the Airport Noise Qualifying Matter to only apply to areas within the 57 dBA Ldn airport noise contour, such a contour to be based on a maximum 30 year assessment period having regard to matters such as future growth projections, predicted flight paths and expected flight paths.

Delete the LPTA QM, in particular as it applies to areas in north west Christchurch.

All consequential, further or alternative amendments to PPC14 to be consistent with and give effect to the intent of this submission and the interests of the Submitter, including but not limited to amendments to Chapter 6.1A Qualifying Matters, Chapter 8 Subdivision, Development and Earthworks, Chapter 14 Residential, Chapter 15 Commercial and Chapter 16 Industrial.

Reasons for Relief Sought

- 1) For the reasons outlined above under 'Zoning and Qualifying Matters'.
- 2) The relief sought is consistent with and gives effect to the Resource Management Act 1991 (RMA). In terms of s32, the objectives (including consequential amendments to be consistent and give effect to the intent of this submission) are the most appropriate way to give effect to the RMA.



.....
(Signature of applicant or person authorized to sign on behalf of the applicant)

Date: May 12, 2023

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Fiona

Last name:

Aston

Organisation:

Troy Lange

Preferred method of contact

Attached Documents

Name
TLange PC14 submission



Submission on Proposed Plan Change 14 - Housing and Business Choice

Troy Lange

Christchurch City Council

RESOURCE MANAGEMENT ACT 1991

CHRISTCHURCH CITY COUNCIL

SUBMISSION ON PLAN CHANGE 14 HOUSING AND BUSINESS CHOICE

Submitter Details

Name: Troy Lange

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PO Box 1435
Christchurch 8140

Email address: fiona@astonconsultants.co.nz

Phone Number: 03 3322618

Mobile Number: 0275 332213

Contact Person Fiona Aston

Specific Proposals to Which this Submission Applies:

Proposed Plan Change 14 (PC14) in its entirety, including but not limited to zoning, qualifying matters, and activity and built form standards, in particular as they affect 120, 100, 88, 76, 68, 66, 60, 46, 44, 42, 40 and 38 Hawthornden Road and other properties located between the current 50 and 55 dBA Ldn Christchurch International Airport (CIAL) Noise Contour.

PPC 14 – Zoning & Qualifying Matters

Zoning

PPC14 essentially proposes 'upzoning' all of the existing residential zones in the Christchurch District Plan except for the Large Lot Residential and Small Settlement Zones and where qualifying matters apply. The proposed Residential Medium Density Zone enables 3 houses per site, up to 3 storeys high, subject to development standards as specified in the Resource Management Enabling Housing Amendment Act 2021 (the Enabling Act), but with an amendment to the Height in Relation to Boundary rule (for which a proposed qualifying matter applies).

Airport Noise Qualifying Matter (QM)

A Qualifying Matter (QM) applies to areas located with the current operative CIAL 50 dBA Ldn noise contour. Intensification of these areas is excluded on the basis that this could result in greater incidence of complaints about airport noise related operations due to the potential for more residents to live in these areas. Applying this QM based on the 50 rather than the 55 dBA Ldn airport noise contour is unnecessarily conservative and out of step with the relevant NZ noise standards (NZS 6802) and international best practice which applies the 55 dBA Ldn noise contour. It results in development restrictions which are not justified on reverse sensitivity grounds.

The land between the 50 and 55 dBA Ldn noise contours remains zoned Rural Urban Fringe with a minimum lot size of 4 ha for subdivision and a dwelling. The land is highly fragmented with existing lots generally 4 ha or smaller (due to historic planning regimes which enabled residential development on smaller lots where supported by, at that time, an economic horticultural use). The land is now almost exclusively used for rural lifestyle purposes, and is exempted from the National Policy Statement – Highly Productive Land (NPS-HPL) under Clause 3.5.7 ai) because the nearest equivalent zone is the Rural Lifestyle Zone.

The inappropriateness of retaining the land between the current urban boundary and CIAL 50 dBA Ldn noise contour in rural zoning was recognized by the Commissioners for Change 1 to the Canterbury Regional Policy (CRPS). In their 2009 recommendation on submissions and further submissions, they identified Special Treatment Areas in their recommended Policy 12 below¹:

Policy 12: Special Treatment Areas

Specific analysis and planning shall be undertaken to achieve the sustainable management of the natural and physical resources of the following areas and to meet the stated expectations:

- (a) In Northwest Christchurch (STA1) to determine the medium and long-term sustainable future of the area affected by airport noise.

Methods

12.1 Christchurch City Council shall undertake specific planning investigations in relation to the three Special Treatment Areas by 2012 in conjunction with landowners within the areas and other stakeholders...

¹ The extent of the Special Treatment Areas was constrained by the nature of submissions on Change 1 to CRPS, but the principle of considering and reassessing the most appropriate and sustainable management areas currently constrained by airport noise related rules applies to the of the entire constrained NW Christchurch area

12.3 Christchurch City Council shall include appropriate zoning and/or other provisions with the district plan as a result of Method 12.1.

Subsequent planning processes were 'overtaken' by legislative changes and earthquake related processes which followed after the 2010/11 Canterbury earthquakes. The expedited Land Use Recovery Plan (LURP) processes replaced the Commissioners decision on Change 1 to the CRPS, and all appeals, including those in relation to the location of the airport noise constrained land, and the basis for the same, were extinguished. The CRPS has not been reviewed since, so that 'untested' approach to airport noise constraints (which is out of step with national and international standards) remains.

Enabling urban development between the 50 and 55 dBA Ldn contour is consistent with and gives effect to the National Policy Statement – Urban Development (NPS-UD). It will free up land for urban development in a location ideally suited to meeting the Council's obligations to provide at least sufficient development capacity to meet expected demand for land for housing and business and will contribute to a well functioning urban environment.

Low Public Transport Accessibility

A further QM relates to areas with low public transport accessibility where the Residential Suburban Zone, Residential Banks Peninsula and Residential Hills Zone and their current standards in the District Plan continue to apply. This limits the application of the Medium Density Residential Zone (and the MDRS standards) to residential areas with the following spatial characteristics:

- Residential areas within 800m walk from five High Frequency (Core) Routes
- Residential areas within 800m walk from additional bus routes with significant potential to connect employment centres together
- Residential areas more than 200m from High Density Residential Zones and the application of Policy 3 in relation to centres, snapping to the nearest city block
- Areas zoned Residential Suburban Density Transition Zone, Residential New Neighbourhoods (RNNZ) and Residential Medium Density²

Based on the PPC14 planning maps, parts of the operative NNZ have been rezoned Future Urban Zone. The MDRS do not apply to the FUZ which retains the operative NNZ standards. These

² Qualifying Matters Section 32 Assessment paragraph 6.32.1

require a minimum net residential density of 15 hh/ha, and minimum lot size 300m², except that up to 20% can be between 180-299m² in area.

The justification for the Low Public Transport Accessibility Qualifying Matter (LPTA QM) is summarized as below:

This qualifying matter will provide for a level of intensification within the qualifying matter area consistent with the level of existing and likely future accessibility to employment, education and community services in these areas and promote an integrated and more efficient and effective approach to the provision of public transport and three waters network infrastructure focussed on areas most suited to enable intensification close to centres and areas with relatively strong demand. It will support well-functioning urban environments reductions in greenhouse gas emissions and support resilience to climate change effects without significantly impacting on housing affordability and competitive land and development markets.³

It aligns the location of medium density development with existing and committed structural investments and cross organisational planning for the provision of public transport in Greater Christchurch, including as set out in the Greater Christchurch Public Transport Combined Business Case 2020 (the PT Combined Business Case).⁴

Enabling urban including residential development of land within the 50-55 dBA Ldn airport noise contour will provide increased opportunity (additional local population and potential patronage) for improved PT between the central city and the CIAL, a major economic hub.

Relief Sought

Rezone land between the 50 and 55 Ldn CIAL airport noise contour for urban development, with no restrictions relating to airport noise, including 120, 100, 88, 76, 68, 66, 60, 46, 44, 42, 40 and 38 Hawthornden Road as identified on the aerial photograph (Figure 1) below. Rezone 120, 100, 88, 76, 68, 66, 60, 46, 44, 42, 40 and 38 Hawthornden Road Future Urban Zone or Medium Density Residential.

³ Qualifying Matters Section 32 Assessment paragraph 6.32.49

⁴ Qualifying Matters Section 32 Assessment paragraph 6.32.11



Figure 1: Land at Hawthornden Road proposed to be rezoned (and in addition other land located between the 50-55 dBA Ldn noise contour)

Amend the Airport Noise Qualifying Matter to only apply to areas within the 55 dBA Ldn CIAL airport noise contour, such a contour to be based on a maximum 30 year assessment period having regard to matters such as future growth projections, predicted flight paths and expected fleet mix. The contour should be based on an assessment of the annual average noise, as opposed to the current contour which is based on the 3 busiest months of commercial aircraft movements.

Delete the LPTA QM, in particular as it applies to areas in north west Christchurch.

All consequential, further or alternative amendments to PPC14 to be consistent with and give effect to the intent of this submission and the interests of the Submitter, including but not limited to amendments to Chapter 6.1A Qualifying Matters, Chapter 8 Subdivision, Development and

Earthworks, Chapter 14 Residential, Chapter 15 Commercial and Chapter 16 Industrial, and addition of Outline Development Plans for the areas sought to be rezoned by this submission.

Reasons for Relief Sought

- 1) For the reasons outlined above under 'Zoning and Qualifying Matters'.
- 2) The relief sought is consistent with and gives effect to the Resource Management Act 1991 (RMA). In terms of s32, the objectives (including consequential amendments to be consistent and give effect to the intent of this submission) are the most appropriate way to give effect to the RMA.



.....
(Signature of applicant or person authorized to sign on behalf of the applicant)

Date: May 12, 2023

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:


Peter

Last name:

Dyhrberg

Preferred method of contact

Attached Documents

Name	
Peter	

Robson, Gina

From: Peter Dyhrberg <peter.dyhrberg@lawbridge.co.nz>
Sent: Saturday, 13 May 2023 3:07 pm
To: Engagement
Subject: Proposed Plan Changes 13 and 14.

To whom it may concern,

1. I confirm this email is from Peter Dyhrberg a resident at 118 Chester Street Christchurch.
2. I endeavoured to transmit a submission on the above-noted proposed Plan Changes last night, well before the 11:59 pm deadline but was unable to effect transmission for lack of a "passcode" or password despite entering my email address and then invoking the "Resume" your submission option and requesting a passcode be sent to me.
3. In the circumstances I therefore request acceptance of my brief submission via this email, now transmitted. (Another point I could not help noticing about the CCC web site for this subject was that ,in a number of locations where there was relevant information, the indication was still being given that the deadline was on the 3rd May 2023.)
4. SUBMISSION.
 - (a) I support the proposed Residential Heritage Areas. In particular I support the proposed Chester Street / Dawson Street Residential Heritage Area including the proposed Interface rules for the adjacent sites which share a boundary with that proposed Residential Heritage Area.
 - (b) I oppose the proposed extent of the High Density Residential Area to the areas of the city north of Armagh Street and between Fitzgerald Avenue to the East and Madras Street to the West. I submit that area should be zoned as a Medium Density Residential Area with building heights limited to the same heights as are proposed for the other such MDR areas (understood to be 14 metres), preferably with a requirement for a greater

setback from any shared boundary with sites in the Residential Heritage Area than is proposed for setbacks from internal boundaries, generally, for the MDR zone(s).

Yours, Peter Dyhrberg.

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Helen


Last name:

Broughton

Preferred method of contact

Email

Attached Documents

Name	
Helen	

Robson, Gina

From: Helen Broughton <helen@broughton.co.nz>
Sent: Friday, 12 May 2023 11:25 pm
To: Engagement; Helen Broughton
Subject: Re Submission On Plan Change 14

helen@broughton.co.nz appears similar to someone who previously sent you email, but may not be that person. [Learn why this could be a risk](#)

My name is Helen Broughton of 25 Rata Street. Christchurch. I am currently Chair of the Waipuna-Halswell, Hornby, Riccarton Community Board, and was a City Councillor from 2001- 2013..I am a RMA Commissioner. As a Councillor for 12 years, I was on all the planning committees, including the committee that handled appeals to the Environment Court. I was involved as Deputy Chair with a range of issues before the Independent Hearings Panel in 2015.

I wish to be heard in support of my submission on Plan Change 14
I could not gain an advantage in trade competition.
My phone number is 0276404935.

The Waipuna Halswell, Hornby Riccarton Community Board has made a detailed submission, and the following is a personal submission, which relates to the area where I live.

It is disappointing to go through a process which residents went through in 2015. The area represented by the Riccarton Bush/Kilmarnock Residents' Association was successful in keeping the area residential suburban and residential suburban transitional density.

This is a far more difficult process in terms of the degree of change and the demands from the central government under the National Policy Statement Urban Development 2020 and the Resource Management {Enabling Housing Supply and Other Matters} Amendment Act 2021.

It is unprecedented for central government to be so directive and particularly concerning that Christchurch was included as a Tier One City , when there was no land scarcity - supposedly the basis for determining which cities were to be Tier One.

I did phone the public servant responsible for progressing this legislation through the House at the time and asked why Christchurch was included. I was advised they believed the largest city in the South Island needed to be included.

However there was no land scarcity that was the criteria at the time. Mayor Lianne Dalziel in a long letter to the Minister of the Environment in October 2019 clearly establishes Christchurch's position.. I was on Council after the earthquakes of 2010 and 2011 and involved in rezoning large areas for residential. I understand from Council staff there is no land scarcity and in my opinion the detailed population projections need to be carefully examined.

I will address the concerns in my immediate area. I will also send through separately a technical framework.

a I support Riccarton House and Bush being a qualifying matter, but consider a greater area needs to be included for the following reasons:.

1 The WSP report commissioned by the Council mapped out a larger area. The south side of Rata street between Rata and Rimu Street was included as was Kahu Road opposite the entrance to Riccarton House. It was a council planning decision to make this area medium density with a height limit of two storeys.

This is a compromise, but I advocate strongly that this area remain suburban density. There is no clear reason to set aside the WSP mapping.

2 Recognition needs to be given to the **Kauri Cluster which could be included within the qualifying matter of Riccarton House and Bush.** In 2007/2008 the area was turned into a precinct by narrowing of carriageway ,grass berms widened, street thresholds introduced or upgraded ,native trees planted in accordance with the street names- Rata trees for Rata Street, Rimu trees for Rimu street etc.

3 Medium density will mean that there will only be a 1.5 metre separation between the fenceline and a house - taking away the current front gardens and the likely removal of roadside reserve trees as the developer has the ability to determine where a driveway is placed. If roadside reserve trees need to come down, Council cannot stop their removal but can insist on replacement trees- usually young saplings.

4 Riccarton House and Bush/ Putaringamotu is a unique NZ heritage site that we have probably taken for granted. Riccarton Bush is of national significance and Riccarton House and Cottage are defined as Highly Significant..Maori were in the area before the arrival of the Deans family.The appropriate surrounding environment for such a significant heritage site is suburban density.. WSP have provided drawings of medium density and high density zoning which demonstrate how the environs and this significant heritage site could be undermined. The significance of this site will only increase in future years and it is imperative Council does not impose higher buildings around this site.

5 There is a larger area around Riccarton House and Bush that the Riccarton Bush /Kilmarnock Residents' Association requests retain suburban density. I fully support this submission

Riccarton - The Foundation Borough For Christchurch - Riccarton was the foundation borough for Christchurch and has a number of significant heritage items which are outlined in the Waipuna- Halswell, Hornby, Riccarton Community Board's submission. There is also the Matai Street cycleway which requires protection from the proposed intensification and eleven notable trees. Christchurch Boys High School commenced in 1881 and the residential properties opposite on Straven Road should retain current zoning. Should this wide area not retain current densities? High density development is completely inappropriate and I have reservations regarding medium density for this area.

I also question the walkable distance of Matai Street and further technical evidence will be provided..

Airport Noise Controls; I support but question if they should go further. I am awaiting the updated report. The contour places the northern side of Rata Street within the noise contours, the southern side outside the noise contours.

Commercial ; i oppose changing the maximum height of a commercial building from 20 to 22 metres for a current low level commercial building adjoining a residential zone.

I would argue for a lower height level, but would need more technical evidence.

Setback- 15.4.2,4 I support proposed setback but would advocate for more distance,.

Should the commercial height alongside a proposed lower level residential area be adjusted.?

I thank you for the opportunity to submit

Helen Broughton.

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Fiona

Last name:

Aston


Organisation:

Jane Harrow

Preferred method of contact

Email

Attached Documents

Name	
2260 revised final JHarrow PC14 submission	



Submission on Proposed Plan Change 14 - Housing and Business Choice

Jane Harrow

Christchurch City Council

RESOURCE MANAGEMENT ACT 1991

CHRISTCHURCH CITY COUNCIL

SUBMISSION ON PLAN CHANGE 14 HOUSING AND BUSINESS CHOICE

Submitter Details

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Resource Management and Planning
PO Box 1435
Christchurch 8140

Email address: fiona@astonconsultants.co.nz

Phone Number: 03 3322618

Mobile Number: 0275 332213

Contact Person Fiona Aston

Specific Proposals to Which this Submission Applies:

Proposed Plan Change 14 (PC14) in its entirety, including but not limited to zoning, qualifying matters, and activity and built form standards, in particular as they affect 384, 388, 420, 422, 424, 426, 434 Sawyers Arms Road and 123 and 141 Gardiners Road and other properties located between the current 50 and 55 dBA Ldn Christchurch International Airport (CIAL) Noise Contour.

PPC 14 – Zoning & Qualifying Matters

Zoning

PPC14 essentially proposes ‘upzoning’ all of the existing residential zones in the Christchurch District Plan except for the Large Lot Residential and Small Settlement Zones and where qualifying matters apply. The proposed Residential Medium Density Zone enables 3 houses per site, up to 3 storeys high, subject to development standards as specified in the Resource Management Enabling Housing Amendment Act 2021 (the Enabling Act), but with an amendment to the Height in Relation to Boundary rule (for which a proposed qualifying matter applies).

Airport Noise Qualifying Matter (QM)

A Qualifying Matter (QM) applies to areas located with the current operative CIAL 50 dBA Ldn noise contour. Intensification of these areas is excluded on the basis that this could result in greater incidence of complaints about airport noise related operations due to the potential for more residents to live in these areas. Applying this QM based on the 50 rather than the 55 dBA Ldn airport noise contour is unnecessarily conservative and out of step with the relevant NZ noise standards (NZS 6802) and international best practice which applies the 55 dBA Ldn noise contour. It results in development restrictions which are not justified on reverse sensitivity grounds.

The land between the 50 and 55 dBA Ldn noise contours remains zoned Rural Urban Fringe with a minimum lot size of 4 ha for subdivision and a dwelling. The land is highly fragmented with existing lots generally 4 ha or smaller (due to historic planning regimes which enabled residential development on smaller lots where supported by, at that time, an economic horticultural use). The land is now almost exclusively used for rural lifestyle purposes, and is exempted from the National Policy Statement – Highly Productive Land (NPS-HPL) under Clause 3.5.7 ai) because the nearest equivalent zone is the Rural Lifestyle Zone.

The inappropriateness of retaining the land between the current urban boundary and CIAL 50 dBA Ldn noise contour in rural zoning was recognized by the Commissioners for Change 1 to the Canterbury Regional Policy (CRPS). In their 2009 recommendation on submissions and further submissions, they identified Special Treatment Areas in their recommended Policy 12 below¹:

Policy 12: Special Treatment Areas

Specific analysis and planning shall be undertaken to achieve the sustainable management of the natural and physical resources of the following areas and to meet the stated expectations:

- (a) In Northwest Christchurch (STA1) to determine the medium and long-term sustainable future of the area affected by airport noise.

Methods

12.1 Christchurch City Council shall undertake specific planning investigations in relation to the three Special Treatment Areas by 2012 in conjunction with landowners within the areas and other stakeholders...

¹ The extent of the Special Treatment Areas was constrained by the nature of submissions on Change 1 to CRPS, but the principle of considering and reassessing the most appropriate and sustainable management areas currently constrained by airport noise related rules applies to the of the entire constrained NW Christchurch area

12.3 Christchurch City Council shall include appropriate zoning and/or other provisions with the district plan as a result of Method 12.1.

Subsequent planning processes were 'overtaken' by legislative changes and earthquake related processes which followed after the 2010/11 Canterbury earthquakes. The expedited Land Use Recovery Plan (LURP) processes replaced the Commissioners decision on Change 1 to the CRPS, and all appeals, including those in relation to the location of the airport noise constrained land, and the basis for the same, were extinguished. The CRPS has not been reviewed since, so that 'untested' approach to airport noise constraints (which is out of step with national and international standards) remains.

Enabling urban development between the 50 and 55 dBA Ldn contour is consistent with and gives effect to the National Policy Statement – Urban Development (NPS-UD). It will free up land for urban development in a location ideally suited to meeting the Council's obligations to provide at least sufficient development capacity to meet expected demand for land for housing and business and will contribute to a well functioning urban environment.

Low Public Transport Accessibility

A further QM relates to areas with low public transport accessibility where the Residential Suburban Zone, Residential Banks Peninsula and Residential Hills Zone and their current standards in the District Plan continue to apply. This limits the application of the Medium Density Residential Zone (and the MDRS standards) to residential areas with the following spatial characteristics:

- Residential areas within 800m walk from five High Frequency (Core) Routes
- Residential areas within 800m walk from additional bus routes with significant potential to connect employment centres together
- Residential areas more than 200m from High Density Residential Zones and the application of Policy 3 in relation to centres, snapping to the nearest city block
- Areas zoned Residential Suburban Density Transition Zone, Residential New Neighbourhoods (RNNZ) and Residential Medium Density²

Based on the PPC14 planning maps, parts of the operative NNZ have been rezoned Future Urban Zone. The MDRS do not apply to the FUZ which retains the operative NNZ standards. These

² Qualifying Matters Section 32 Assessment paragraph 6.32.1

require a minimum net residential density of 15 hh/ha, and minimum lot size 300m², except that up to 20% can be between 180-299m² in area.

The justification for the Low Public Transport Accessibility Qualifying Matter (LPTA QM) is summarized as below:

This qualifying matter will provide for a level of intensification within the qualifying matter area consistent with the level of existing and likely future accessibility to employment, education and community services in these areas and promote an integrated and more efficient and effective approach to the provision of public transport and three waters network infrastructure focussed on areas most suited to enable intensification close to centres and areas with relatively strong demand. It will support well-functioning urban environments reductions in greenhouse gas emissions and support resilience to climate change effects without significantly impacting on housing affordability and competitive land and development markets.³

It aligns the location of medium density development with existing and committed structural investments and cross organisational planning for the provision of public transport in Greater Christchurch, including as set out in the Greater Christchurch Public Transport Combined Business Case 2020 (the PT Combined Business Case).⁴

Enabling urban including residential development of land within the 50-55 dBA Ldn airport noise contour will provide increased opportunity (additional local population and potential patronage) for improved PT between the central city and the CIAL, a major economic hub.

Relief Sought

Rezone land between the 50 and 55 Ldn CIAL airport noise contour for urban development, with no restrictions relating to airport noise, including 384, 388, 420, 422, 424, 426, 434 Sawyers Arms Road and 123 and 141 Gardiners Road as identified on the aerial photograph below. Rezone 384, 388, 420, 422, 424, 426, 434 Sawyers Arms Road and 123 and 141 Gardiners Road Future Urban Zone or Medium Density Residential.

Amend the Airport Noise Qualifying Matter to only apply to areas within the 55 dBA Ldn airport noise contour , such a contour to be based on a maximum 30 year assessment period having

³ Qualifying Matters Section 32 Assessment paragraph 6.32.49

⁴ Qualifying Matters Section 32 Assessment paragraph 6.32.11


regard to matters such as future growth projections, predicted flight paths and expected fleet mix. The contour should be based on an assessment of the annual average noise, as opposed to the current contour which is based on the 3 busiest months of commercial aircraft movements.

Delete the LPTA QM, in particular as it applies to areas in north west Christchurch.

All consequential, further or alternative amendments to PPC14 to be consistent with and give effect to the intent of this submission and the interests of the Submitter, including but not limited to amendments to Chapter 6.1A Qualifying Matters, Chapter 8 Subdivision, Development and Earthworks, Chapter 14 Residential, Chapter 15 Commercial and Chapter 16 Industrial.

Reasons for Relief Sought

- 1) For the reasons outlined above under 'Zoning and Qualifying Matters'.
- 2) The relief sought is consistent with and gives effect to the Resource Management Act 1991 (RMA). In terms of s32, the objectives (including consequential amendments to be consistent and give effect to the intent of this submission) are the most appropriate way to give effect to the RMA.



.....
(Signature of applicant or person authorized to sign on behalf of the applicant)

Date: May 12, 2023

Submitter Details

First name: David

Last name: Smithson

Preferred method of contact	Postal
-----------------------------	--------

Attached Documents

Name
David Smith submission final

Have your say

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

Save time and do it online

ccc.govt.nz/haveyoursay

RECEIVED

12 MAY 2023

Clause 6 of Schedule 1 Resource Management Act 1991

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

Gender: ☒ Male ☐ Female ☐ Non-binary/another gender
Age: ☐ Under 18 years ☐ 18-24 years ☐ 25-34 years ☐ 35-49 years ☐ 50-64 years
☒ 65-79 years ☐ over 80 years
Ethnicity: ☒ New Zealand European ☐ Māori ☐ Pacific Peoples ☐ Asian
☐ Middle Eastern/Latin American/African ☐ Other European ☐ Other

* Required information

Name* David Smithson
Address* 27 Normans Rd Postcode* 8052
Email strowan@stra.co.nz Phone no. _____

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

Organisation's name _____
Your role _____

Trade competition and adverse effects* (select appropriate)

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

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

(a) adversely affects the environment, and

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

Yes ☐ No ☒

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

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

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

☐ I wish to speak in support of my submission on Plan Change 14

☒ I do not wish to speak.

Joint submissions (Please tick this box if you agree)

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

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

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

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

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

Signature David Smithson Date 9/5/23

Have your say

Housing and Business Choice Plan Change 14

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

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

In particular Infrastructure

" Section 14.2.8.5

" 14.2.8.6

My submission is that:*

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

- Traffic is a nightmare no parking spaces + inconsiderate people parking across + in our driveways
- Dangerous = for pedestrians + residents
- Stormwater + wastewater system are over loaded now conditions are unsafe - traffic problems endless.

I seek the following decision from the Council:*

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

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

I strongly ask that Council CHANGE the (MRZ) which is proposed for the eastern blocks of Strouan from Normans Rd to Blinks Rd. to (MRZ) to halt the increase of current unsafe traffic issues + unhealthy wastewater problems.

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council




Submitter Details

Submission Date: 12/05/2023

First name: Susanne **Last name:** Elizabeth Hill

Preferred method of contact Postal

Attached Documents

Name	
Susanne Elizabeth Hill final	

Have your say

Save time and do it online

ccc.govt.nz/haveyoursay

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

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

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

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

* Required information

Name* Suzanne Elizabeth Hill
Address* 85 Normans Road Struan Christchurch Postcode* 8052
Email sue@ghrooving.co.nz Phone no. _____

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

Organisation's name _____
Your role _____

Trade competition and adverse effects* (select appropriate)

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

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

(a) adversely affects the environment, and

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

☐ Yes ☒ No

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

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

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

Joint submissions (Please tick this box if you agree)

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

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

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

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

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

Signature _____

Date _____

2/5/23.

Have your say

Housing and Business Choice Plan Change 14

The specific provisions of the plan change that my submission relates to are as follows:*
(Please continue on separate sheet(s) if necessary.)

My submission is that:*

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

I strongly disagree to 4-5 storeys without a resource consent
6 storeys is ~~not~~ unacceptable.

The parking is a problem at the moment with St. Andrews being over the road imagine what it would be like with 4-5 storeys let alone 6 storeys.

We would also lose our sun & privacy from our homes.
We have just moved into this area and to read the infrastructure is not good doesn't make me very happy as a rate payer.

I seek the following decision from the Council:*

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

- ① I would like to see Townhouses put on these big sections when the older houses are passed their liveable stage. mainly two townhouses at the most 3 if section is big enough.
- ② Look at carparking if this proposable is to go ahead.
- ③ Make the High-Density Residential Zone closer too centre of the City not out in the suburbs.

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Graham


Last name:

William Hill

Preferred method of contact

Postal

Attached Documents

Name	
Graham William Hill final	

Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

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

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

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

* Required information

Name* Graham William HillAddress* 85 Normans Rd Strawn Postcode* 8052Email graham@ghroofing.co.nz Phone no. 0274354214

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

Organisation's name _____

Your role _____

Trade competition and adverse effects* (select appropriate)

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

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

(a) adversely affects the environment, and

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

☐ Yes☒ No

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

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

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

Joint submissions (Please tick this box if you agree)

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

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

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

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

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

Signature

G.W. Hill

Date

2.5.2023

Have your say

Housing and Business Choice Plan Change 14

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

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

My submission is that:*

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

I oppose the Building of 4-5 Storeys
we have just purchased a new House on
Normans Road, To see High Units going up
would be devastating.

There is a Big problem now with parking along
Normans Road.

To have a 4-5 storey Built beside us
would impact on our Sun.

I seek the following decision from the Council:*

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

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

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Alan

Last name:

John David Gillies

Preferred method of contact

Postal

Attached Documents

Name
Alan John David Gilliesfinal

Save time and do it online

ccc.govt.nz/haveyoursay

Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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12 MAY 2023

an,

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

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

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

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

* Required information

Name* ALAN JOHN DAVID GILLIES

Address* 95 NORMANS ROAD

Postcode* 8052

Email john.gillies@xtra.co.nz

Phone no. 0274337504

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

Organisation's name N/A

Your role N/A

Trade competition and adverse effects* (select appropriate)

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

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

(a) adversely affects the environment, and

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

☐ Yes ☐ No

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

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

☐ I wish to speak in support of my submission on Plan Change 14

☒ I do not wish to speak.

Joint submissions (Please tick this box if you agree)

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

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

☐ Yes, I have attached extra sheets.

☒ No, I have not attached extra sheets.

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

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

Signature [Signature]

Date 1/5/23

Have your say

Housing and Business Choice Plan Change 14

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

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

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.

My submission is that:*

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

THE STROWAN AREA AND IN PARTICULAR, THE ST. ANDREWS COLLEGE REGION, ARE ALREADY STRESSED TO BREAKING POINT WITH REGARDS TO CAR PARKING, TRAFFIC CONGESTION, PROVISION OF ESSENTIAL SERVICES AS WELL AS STORMWATER AND WASTEWATER MANAGEMENT.

I seek the following decision from the Council:*

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

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

THE HIGH DENSITY RESIDENTIAL ZONE (HRZ) PROPOSED FOR THE STROWAN RESIDENTIAL BLOCKS FROM NORMANS TO BLIGHTS ROAD RUNS THE RISK OF CONVERTING THIS ECOLOGICALLY ATTRACTIVE REGION INTO AN OVERCROWDED GHETTO! I WOULD ADVISE STRONGLY THAT THE COUNCIL REVISES ITS PLAN TO A MEDIUM DENSITY RESIDENTIAL DEVELOPMENT (MRZ)

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Wayne

Last name: Robertson

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment


I seek the following decision from the Council

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

My submission is that:

High residential zones and Medium residential zones. See the full submission attached.

Attached Documents

Name	
Wayne Roberston final	

Save time and do it online

ccc.govt.nz/haveyoursay

Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

Gender: ☒ Male ☐ Female ☐ Non-binary/another genderAge: ☐ Under 18 years ☐ 18-24 years ☐ 25-34 years ☐ 35-49 years ☒ 50-64 years
☐ 65-79 years ☐ over 80 yearsEthnicity: ☒ New Zealand European ☐ Māori ☐ Pacific Peoples ☐ Asian
☐ Middle Eastern/Latin American/African ☐ Other European ☐ Other*** Required information**Name* WAYME ROBERTSONAddress* 2/14 BISHOP STREET, CHRISTCHURCH Postcode* 8014Email robertsonsteel@yahoo.co.nz Phone no. 021 1157371

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

Organisation's name N/AYour role N/A**Trade competition and adverse effects* (select appropriate)**☐ I could / ☒ could not gain an advantage in trade competition through this submission.

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

(a) adversely affects the environment, and

(b) does not relate to the trade competition or the effects of trade competition? N/A ☐ Yes ☐ No*** A person who could gain an advantage in trade competition through the submission may make a submission only if you answered Yes to the above, as per clause 6(4) of Schedule 1 of the Resource Management Act 1991.****Please indicate by ticking the relevant box whether you wish to be heard in support of your submission***☐ I wish to speak in support of my submission on Plan Change 13☐ I wish to speak in support of my submission on Plan Change 14☒ I do not wish to speak.**Joint submissions (Please tick this box if you agree)**☐ If others make a similar submission, I will consider presenting a joint case with them at the hearing.**If you have used extra sheets for this submission, please attach them to this form and indicate below***☒ Yes, I have attached extra sheets. ☐ No, I have not attached extra sheets.**Signature of submitter (or person authorised to sign on behalf of submitter)**

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

Signature

W Robertson

Date

10 MAY 2023

Have your say

Housing and Business Choice Plan Change 14

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

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

1. Designated areas for Higher and Medium Density Residential Zones.
2. Rules relating to greater sunlight access for homes.

My submission is that:*

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

See attached submission

I seek the following decision from the Council:*

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

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

1. High Density Zones be restricted to within the four avenues and where whole areas/land is to be developed outside of the four avenues
2. Medium Density Zones should be limited to two storey developments (with an exemption for commercial buildings provided they do not impair sun or light for existing residential dwellings.

Submission on Housing and Business Choice Plan Change (Plan Change 14)

Building intensity of residential dwellings in excess of two storeys should be limited to within the four avenues, thus protecting existing home owners' rights to light and sunshine. The exception to this should be where new subdivisions / whole areas are developed outside of the four avenues so purchasers know what they are buying and the possibilities of having reduced light and / or no sun for several months of the year are already known. This could have happened when the Pegasus township was built and other possibilities could be where a large area of land could be developed, e.g. the large empty site on Madras Street just north of Purchas Street could be built to three or four storeys (maximum).

Internationally, many cities have intense housing within the city zone and this should be the case for Christchurch. The area within the four avenues is large enough to accommodate increased and extensive development, and there are still many sites that could be intensively developed. In addition, it is well known and accepted that the intensity within the four avenues is already greater than in other parts of the city so when purchasers currently buy within the four avenues they know the intensity may be greater than beyond the four avenues, i.e. they know what they are buying into and willingly move into the area.

Existing home owners outside of the four avenues have bought their properties in good faith, expecting they will have light and sun as per the current arrangements, or that there will be minimal impact as currently it is well known that two storey buildings can be built. It is unfair and wrong to have that taken away by the Council by them amending the parameters. In addition, having a three or four storey building, or maybe even higher, built next door to an existing property impacts on the resale value of the affected property(ies) and the home owners will have no right of re-dress to claim any shortfall. This is grossly unfair as some home owners will be affected, i.e. those that have three or more storey buildings built next door to them, and some won't, i.e. those that will have no developments built next door to them. Inequitable situations will arise and it should never be the Council's intention to create these.

A great example of more intensive development within the four avenues is the One Central development in the East frame built by Fletchers. Developments, such as the Worcester Terraces development could have been many more than the three stor which have been built, thus providing even more accommodation, and any prospective purchasers know exactly what they are purchasing in terms of the effects of light and sun.

In summary:

- High-Density Zones should be restricted to within the four avenues or beyond where new subdivisions / whole areas are to be developed. High-Density zoning should not apply to any existing residential situations outside of the four avenues (with new subdivisions / whole areas to be developed being the exception). There should be no height restrictions regarding residential dwellings in High-Density Zones.
- Medium Density Zones should apply to all areas not classified as High-Density Zones and building heights for residential dwellings should be limited to two storey buildings. Commercial buildings could be exempt from this restriction provided there is no impact on light and sun to existing residential dwellings.

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Susanne and Janice

Last name:

Antill

Preferred method of contact

Email

Attached Documents

Name
submission to council (003)

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

We totally oppose the new planning rules in the Christchurch District Plan.
These proposals would substantially alter the character of Christchurch for residents of Christchurch and detrimentally affect our quality of life.

It reflects a top down management by a foreigner with globalist allegiances.
The general wording is non specific platitudes. It could mean anything.

1. We oppose replacing existing residential zones in the city with two new ones – a medium density zone and a high density zone.

What rationale? Are you planning for massive overseas population immigration into Christchurch for a 15 minute smart city when the birth rate of Christchurch residents is low, particularly after the mandated experimental, untested jabs on young New Zealanders which has probably sterilized many of them.

2. We oppose increased height limits of buildings. Christchurch is on an aquifer flood plane and subject to earthquakes. This is totally crazy.

3. What does this sentence mean: “ Special rules for housing and business to better reflect our city’s environment and climate”?

4. What does this sentence mean:” Heritage that should be protected, with a number of new buildings, items and interiors added to the Schedule of Significant Historic Heritage.”?
This does not make sense.

Are you trying to pull a fast one? And are you going to destroy anything that you do not deem to be of historical significance? Will you destroy the character of Christchurch the way you deconstructed and destroyed the Christchurch Library?

There is no mention here of 5G.

We totally oppose denser housing which will actually cut sunlight from residences.

We oppose 15 minute cities which will curtail our freedom

We oppose smart cities which will be detrimental to our health

We oppose 5G towers which pose a significant threat to both our freedom and our health

We oppose mass overseas immigration into Christchurch which is a globalist agenda not a Christchurch citizens agenda.

This council does not listen to what residents want and runs rough shod over the opinions and wishes of Christchurch residents. For example the Harewood Road Cycleway which was opposed by the majority of Harewood residents.

Susanne Antill

Janice Antill

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

08/05/2023

First name:

Jacq


Last name:

Woods

Preferred method of contact

Email

Attached Documents

Name	
Jaca Woods submission	

Have your say

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

RECEIVED

12 MAY 2023

Clause 6 of Schedule 1 Resource Management Act 1991

Encl. 4-40pm

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

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

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

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

*** Required information**

Name* Jacq Woods
Address* 6 Watford St, Strowan, ChCh Postcode* 8052
Email jacq.woods@extra.co.nz Phone no. 0273636448

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

Organisation's name _____

Your role _____

Trade competition and adverse effects* (select appropriate)

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

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

(a) adversely affects the environment, and

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

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

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

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

☐ I wish to speak in support of my submission on Plan Change 14

☐ I do not wish to speak.

Joint submissions (Please tick this box if you agree)

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

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

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

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

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

Signature Jacq Woods Date 8-5-2023

Have your say

Housing and Business Choice Plan Change 14

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

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

Infrastructure Servicing for Developments
Section 14.2.8.5

"ensure that developments are serviced with all required infrastructure in an effective & efficient manner"

My submission is that:*

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

I support the proposed provisions for all required infrastructure to service & support development in an effective & efficient manner.

I also support the intention to avoid significant adverse effects of development on existing infrastructures,

BUT - there are significant existing pressures in the Strowan area, especially in the vicinity of St Andrews College. There is ALREADY a very significant health & safety issue with traffic congestion, carparking congestion, "rat running" up Watford Street, parking on

I seek the following decision from the Council:*

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

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

(cont
pg ③)

That the High Density Residential Zone for the Strowan blocks west of Papanui Road - from Normans Road to Blighs, along Watford Street be revised to Medium Density Residential Zone to avoid unacceptable & unsafe escalation of the existing issues with infrastructure overload in our community

yellow lines, congestion & delays at intersections, especially Normans/Papanui Rd
 • Normans/Strowan Rd.

The existing stormwater and waste water networks are already not coping with the demand. Several areas in the Watford St neighbourhood flood and roads have been closed recently during high rainfall events.

Intensification of substantial areas of Strowan, especially Watford Street as proposed in the Plan Change 14, will make these issues much worse and lead to unsafe transport infrastructure and unhealthy / poorly functioning stormwater & waste water networks.

St Andrews College is the only co-educational private school in the South Island with it's Special Character (Presbyterian), educating 1700+ students from pre-school - prep school - secondary school.

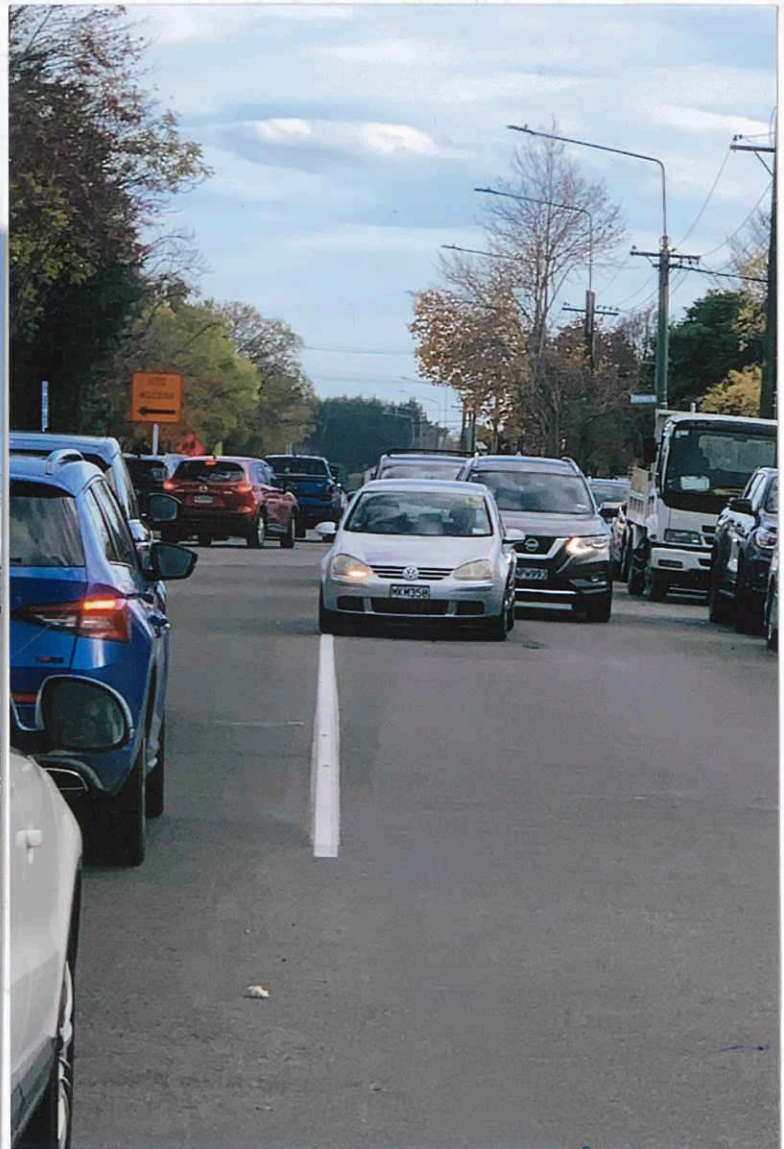
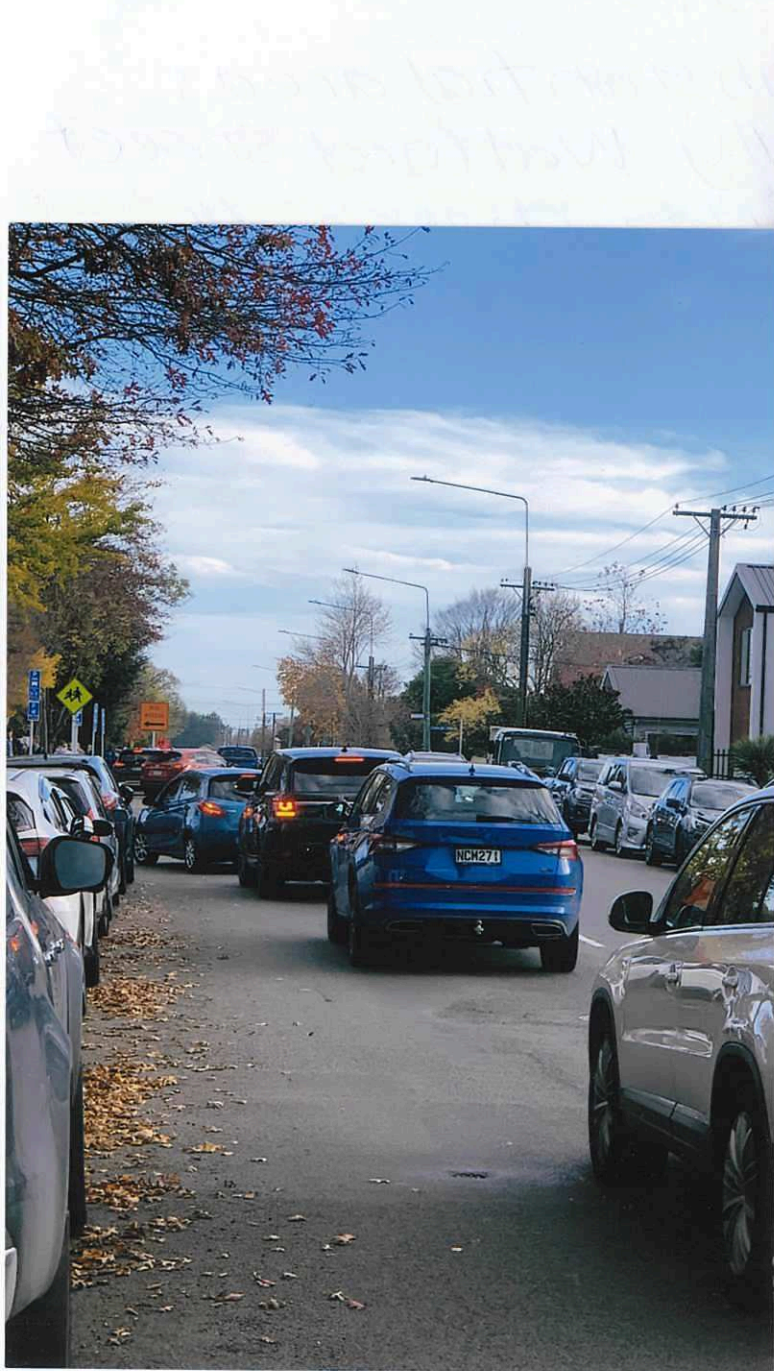
It has a large wait list and will continue to attract students from across the South Island.

Also, it's facilities are used all year around (not just during school days) and the congestion is

This is a special area and needs special consideration so the school

and neighbourhood surrounding it, can live in harmony. 894

* If High Density Developments were built with no carparking on site (as allowed) there would be no safe parking for them on the already congested streets (e.g. 2 hour parking on one side of the roads). This is unsafe & dangerous for elderly people, disabled people and for families for young children.



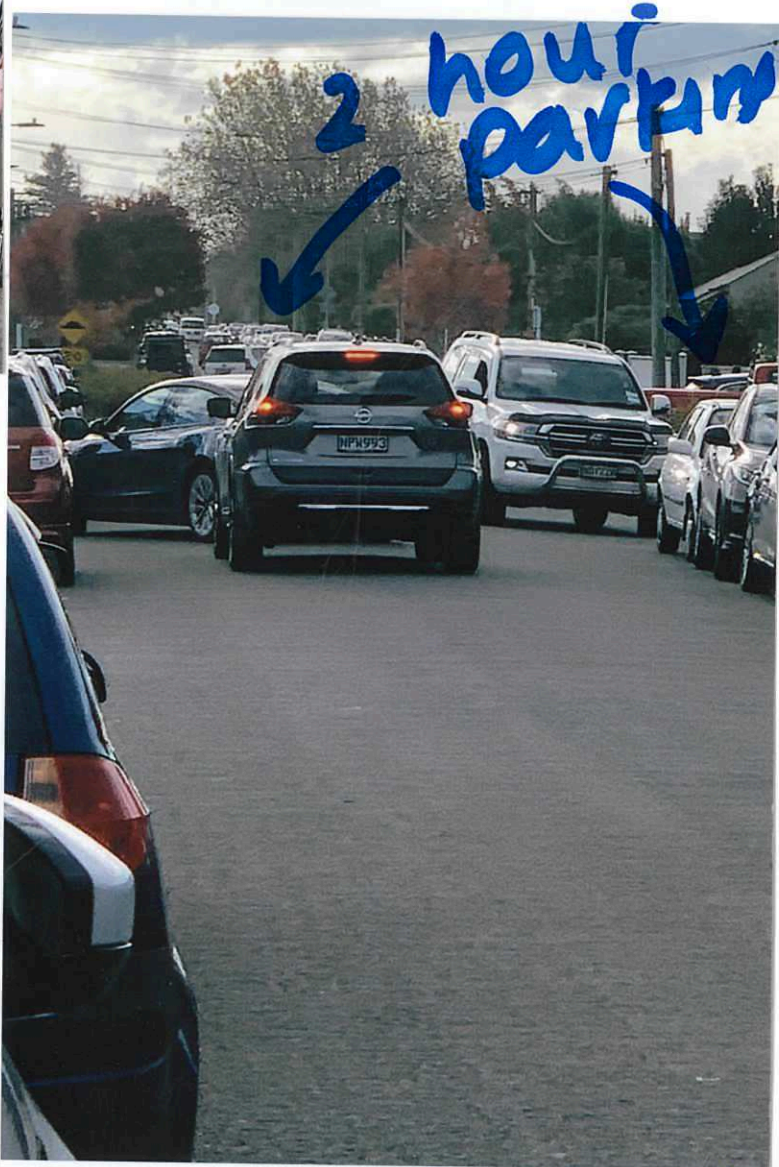
Norman's /
Watford
corner.



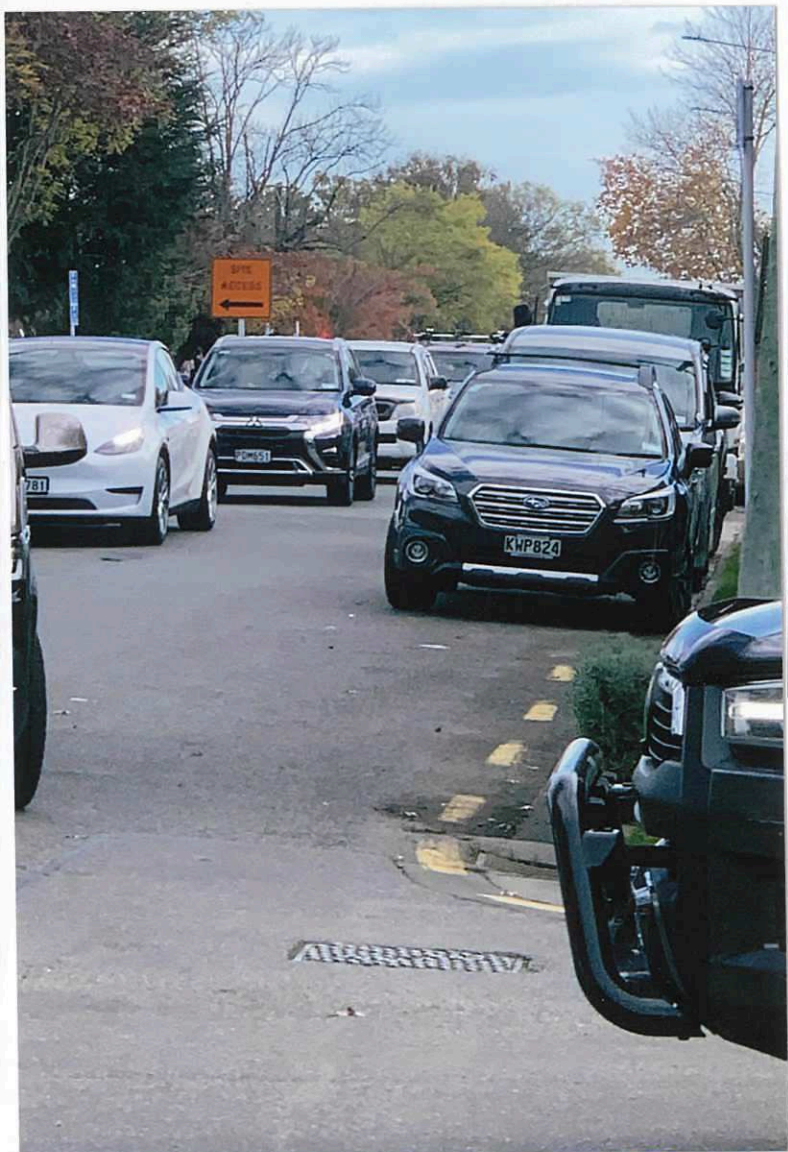
2 hour parking

Normans Road

894
4



2 hour parking



Watford Street

Normans/Watford corner

→ a typical
scene on Normans
Road every morning
and afternoon
congestion everywhere!



Brenchley Ave!

Have your say

Housing and Business Choice Plan Change 14

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

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

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

My submission is that:*

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

I suggest the proposed High Density Residential Zone which is almost continuous down Papanui Road — one block either side is NOT consistent with the stated intent of this Section/Policy. It certainly does not support medium density residential development which is attractive to residents, responsive to housing demands & reflects the planned urban built character of an area. PTO

I seek the following decision from the Council:*

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

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

That the High Density Residential Zone proposed for the Strouan blocks west of Papanui Road — from Normans Rd to Blighs Road along Watford Street be revised to Medium Density Residential Zone. to avoid an unacceptable impact of the amenity/character of the Strouan community making it far less attractive to residents and which certainly does not reflect the planned urban character of our neighbourhood

My concerns are -

The Strowan neighbourhood has an amenity character & fabric & a sense of community which is very attractive to residents - which is highly valued and worthy of retention

- there are a number of prominent trees & landscaping on properties which reinforces both the perception & reality of quality open space 'around' buildings, which clearly supports the Councils Urban Forest Plan 2023 initiative
- the majority of the homes are older, character homes
- most homes are on larger than average sections & a sense of open space is still present.
- 2 older homes adjacent to ours have recently been demolished and have been very well developed with 2 homes on each / 2 storey / ~~be~~ all with off street garaging and blend well with the existing character homes.
- ↳ the thought of a 4 → 10 storey development amongst these family homes is a very scary prospect!

⑥

— character
homes
on
Watford St.



— Normans
Rd new
build beside
existing
character
home

1



— new
development
on
Watford St
blends well
with
existing
character
homes



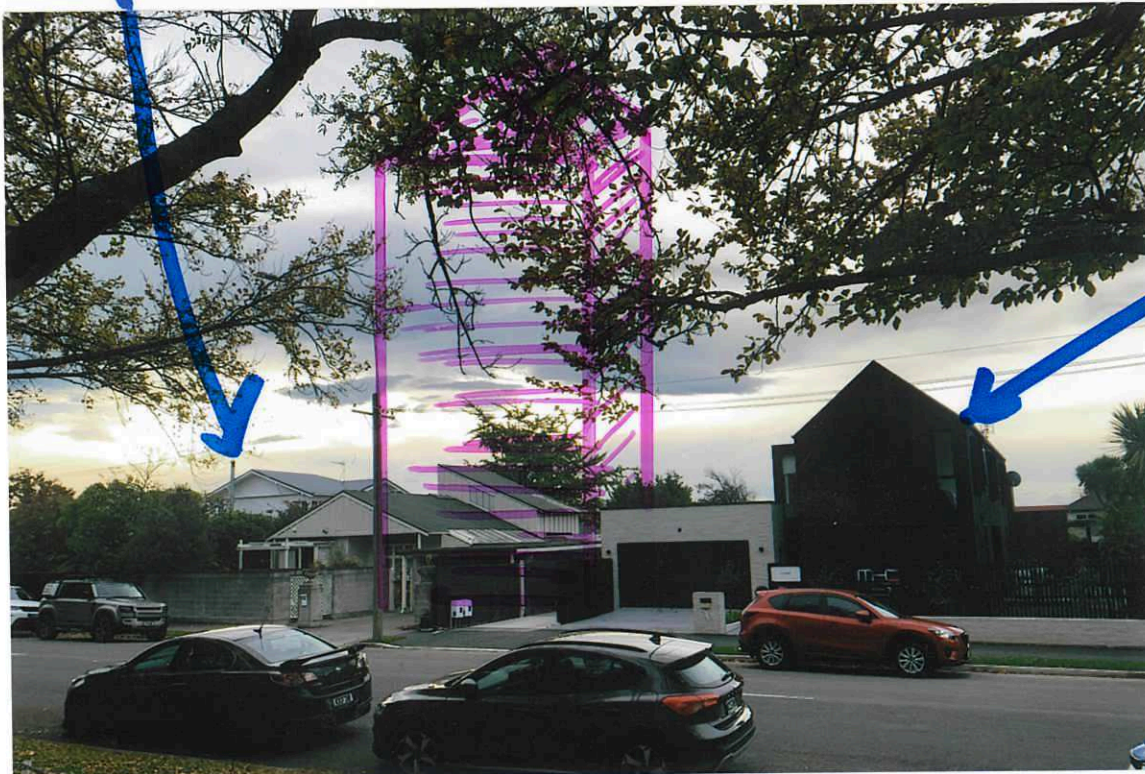


Attractive development on Wofford St —
2 family homes (4 bedroom) with double
garages.

100 year old
character
5 bedroom
home.

**PLEASE
NO !!!**

(= this
is only
equivalent
to a 4 storey !!)



2 new
brand new
4 bedroom
homes on
Normans
Road



These photos are taken outside 93 Normans Rd which is proposed to be High Density Residential. As you can see, the existing storm water cannot cope with the runoff from 2 driveways.

In conclusion

PLEASE CHANGE OUR ZONE IN WATFORD STREET TO MEDIUM DENSITY ... as it is on the other side of Watford Street.

As I have stated in this submission, our street is already stretched to capacity with regards to car parking, traffic safety & congestion, infrastructure of waste water.

High Density developments along Watford Street would exacerbate all of these existing issues.

... and ... Watford Street is NOT adjacent to a commercial hub. ... where high density housing would be more suited.

... and due to the close proximity to St Andrews College (which is NOT a zoned school) ... health and safety should be of HIGH PRIORITY.

Thank you for considering my submission!

John

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

10/05/2023

First name:

Tim


Last name:

Priddy

Preferred method of contact

Email

Attached Documents

Name	
Tim Priddy submission	

Have your say

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

RECEIVED

2 MAY 2023

Tim 4:40pm

Clause 6 of Schedule 1 Resource Management Act 1991

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

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

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

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

* Required information

Name* TIM PRIDDY
Address* 6 WATFORD STREET, STROWAN, CHRISTCHURCH Postcode* 8052
Email timdpriddy@gmail.com Phone no. _____

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

Organisation's name _____
Your role _____

Trade competition and adverse effects* (select appropriate)

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

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

(a) adversely affects the environment, and

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

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

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

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

Joint submissions (Please tick this box if you agree)

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

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

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

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

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

Signature Tim Priddy Date 10 May 2023

Have your say

Housing and Business Choice Plan Change 14

Infrastructure Provision

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

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

Section 14.2.8.5 Policy - Infrastructure servicing for development
(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

My submission is that:*

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

I support the proposed provisions for all required infrastructure to service and support development in an effective and efficient manner. I also support the intention to avoid significant adverse effects of development on existing infrastructure.

But there are significant existing pressures in the Shonan community, especially in the vicinity of St Andrews' College. This includes

- the supply of on-street carparking spaces cannot match the demand for carparking - illustrated by further recent extension of time-based parking restrictions on many surrounding streets.

Continued on page 3

I seek the following decision from the Council:*

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

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

That the proposed High Density Residential Zone (HRZ) for the blocks in the Shonan area, west of Papanui Road, from Normans Road to Blighs Road, be revised to Medium Density Residential Zone (MRZ) to ~~avoid~~ avoid unsafe and unacceptable escalation of the existing issues with transport infrastructure overload in the community.

- the continuing popularity and growth of St Andrews' College, with very little on-site carparking for staff and zero on-site carparking for students, inexorably increases the carparking issues. Any increase in housing intensification in the Strouan community (whether it be Medium Density Residential Zone (MRZ) or High Density Residential Zone (HRZ) will magnify this problem as new housing developments are no longer required to provide on-site carparking.
- the current traffic management issues associated with St Andrews' College pose a significant health and safety risk - from congestion in Normans Road and surrounding streets at school drop-off and pick-up times in particular;
 - from irresponsible drivers double parking, parking over yellow 'No Stopping' lines, parking over driveways;
 - from drivers seeking alternate routes, (short-cuts, rat runs etc) on the local road network; and
 - from congestion at intersections on Papanui Road and Strouan Road/Waiwaka Road (higher classification roads),
 all ~~to~~ related to congestion.

These issues will be exacerbated by the proposed intensification of residential development in the Strouan community, but especially by the proposed HRZ over the several blocks to the west of Papanui Road, from Normans Road to Blighs Road.

Have your say

Housing and Business Choice Plan Change 14

Infrastructure Provision

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

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

Section 14.6.2 Built form standards

Note I am referencing this Section of the proposed Plan Change 14 but I recognise that this may not be the most appropriate section.

My submission is that:*

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

I support the proposed provisions for required infrastructure to service and support development effectively and efficiently.

But in our immediate community of Strowan there are already pockets of flooding in rainfall events (in Breckley Avenue for example) where both the stormwater and wastewater networks are overloaded and do not cope in these events. Infiltration of floodwater into the wastewater system gives rise to overflows of both systems with unsafe and unhealthy sewage contamination of surface water and consequently contamination of waterways, streams etc downstream.

Urban intensification is a significant contributor to this problem as the increase in 'hard' surfaces (roof, paved areas) and linked decrease in soft areas (grass, landscape areas) increases the quantity and speed of stormwater into side channels - often causing flooding (a major contributor to Auckland region flooding)

I seek the following decision from the Council:*

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

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

That the proposed HRZ for the blocks in the Strowan area, west of Papanui Road, from Normans Road to Blighs Road, be revised to MRZ to avoid unsafe, insanitary, unhealthy and unacceptable escalation of the existing issues with stormwater and wastewater infrastructure overload in the community.

(continued on page 5)

over the Anniversary weekend 27 January - 2 February 2023).

These issues will be significantly exacerbated by the proposed intensification of residential development in the Stoway community; especially by or through the proposed HRZ area over many blocks west of Papenui Road (from Normans Road to Blighs Road) which is immediately adjacent to the existing problem area.

Have your say

Housing and Business Choice Plan Change 14

CHARACTER AMENITY

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

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

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

My submission is that:*

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

I support the intention of this section in the proposed Plan Change 14. However, it belies belief that the proposed HRZ in the Strouan area, west of Papanui Road from Normans Road to Blighs Road could in any way be seen to be consistent with an in support of this Section and the wording of this section. In particular

- the Strouan neighbourhood/community has an amenity, character and fabric accompanied by a real sense of community, which is very attractive to families as residents,
- highly valued and
- worthy of retention

(continued on page 7)

I seek the following decision from the Council:*

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

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

That the proposed HRZ for the blocks in the Strouan area, west of Papanui Road, from Normans Road to Blighs Road, be revised to MRZ to avoid the degradation of the character and amenity of the neighbourhood which will impact negatively on the planned urban built character of the area.

- this community is characterised by a number of elements, including
 - still a significant proportion of older, quality, 'family' homes;
 - the homes are typically on good sized sections so a sense of open space is still present;
 - there are a number of prominent trees and landscaping on properties which reinforces the perception and reality of quality open space around buildings (which clearly supports Council's Urban Forest Plan 2023 initiative);
 - the number of new homes which have been developed are typically two storey, with a scale, density and quality generally in-keeping with the existing character and built form found in the surrounding Strawan Community.

Have your say

Housing and Business Choice Plan Change 14

HRZ NOT CONSISTENT WITH

STATED INTENTION

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

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

Section 14.2.7 Objective - High Density Residential Zone

a High density residential development near larger commercial centres...

Section 14.2.7.2 Policy - high density location

- i Enable high density residential development with walking catchments of the City centre zone
- ii Town Centre zones of Riccarton, Paparua and Hornby and
- iii Other larger commercial centres zoned as Town Centres and Local Centres

My submission is that:*

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

I support the specific description of HRZ areas as proposed

But clearly the part of the Struan community proposed as HRZ does not meet the stated criteria

In studying the supporting information related to Plan Change 14, I suggest that there is an anomaly. The proposed zones on page 9 of the Consultation document, which has been confirmed through discussion with nominated, relevant Council staff, that the specific intention is to have

- a proposed 'larger Town Centre' zone in the vicinity of the Merivale commercial centre with an associated HRZ stretching along the spine of Paparua Road as far north as Heaton Street / Innes Road

(continued on page 9)

I seek the following decision from the Council:*

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

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

That the significant infrastructure overload issues in the Struan community currently, especially in the vicinity of St Andrews' College, be mitigated by Council through following the approach which Council has outlined in the Consultation document.

That is, by limiting the HRZ area as detailed (north from the Merivale commercial centre to Heaton Street / Innes Road and south from the Paparua commercial centre to Blighs Road) and not extending the HRZ area between these two areas, along the stretch of Paparua Road through the Struan community.

- in a similar way, it is clear that a proposed 'larger Town Centre' zone is created in the vicinity of the Papanui commercial centre with an associated HRZ stretching along the spine of Papanui Road as far south as Blighs Road.

But the planning maps contradict this and show these HRZ areas as joined or continuous along the spine of Papanui Road.

Have your say

Housing and Business Choice Plan Change 14

CARPARKING PROVISION FOR VULNERABLE MEMBERS OF OUR COMMUNITY

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

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

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.

My submission is that:*

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

I fully support the intention of these sections (and others) in the proposed Plan Change 14.

However, the removal of the requirements for new residential housing developments to provide any on-site carparking, will have a significant and disproportionate negative 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.

(continued on page 11)

I seek the following decision from the Council:*

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

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

That the proposed HRZ for the blocks in the Shonan area, west of Ipanui Road, from Normans Road to Bights Road, be revised to MRZ to mitigate (in a small way) the significant adverse impact on 'vulnerable' communities in the Shonan area.

Unfortunately, under the proposed Plan Change 14,

'vulnerable' includes

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

as increasingly they and their visitors will not be able to have an ability to park their vehicle near to their place of residence

Whilst this will be an issue across the city, it will be exacerbated in the Strawn area, especially in the vicinity of St Andrews' College, where the current on-street carparking supply does not meet supply.

I have been unable to find any specific references in the proposed Plan Change 14, as to how this negative impact on vulnerable communities will be addressed, no mention of how it will be alleviated or mitigated.

It is clear that people will become less reliant on private vehicles but this will take many years of changed behaviour, a better public transport system, other modes of transport available etc - perhaps over several generations - but I cannot find how the transitional change will be addressed.

If this is the case, it is of great concern that the proposed Plan Change 14 is so lacking in recognition of the issue and provision to mitigate and/or address.

Thank you for the opportunity to submit on the proposed Plan Change 14.

Tim Piddler

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

09/05/2023

First name:

Claire


Last name:

Coveney

Preferred method of contact

Postal

Attached Documents

Name	
Claire Coveney PC14	

Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

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

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

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

* Required information

Name* Claire Coveney
Address* 13 Earl Street Opawa Postcode* 8022
Email clairecoveneyisa@gmail.com Phone no. 0274901234

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

Organisation's name _____

Your role _____

Trade competition and adverse effects* (select appropriate)

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

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

(a) adversely affects the environment, and

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

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

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

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

Joint submissions (Please tick this box if you agree)

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

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

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

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

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

Signature Claire Coveney Date 9-5-23

Have your say

Housing and Business Choice Plan Change 14

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

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

Infrastructure. MDRS

My submission is that:*

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

Medium-high density housing needs to include close to cycleways and rail corridors.

All medium-high density & future housing needs to be built away from close proximity to wetlands and rivers.

I seek the following decision from the Council:*

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

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

Recognition of rail corridors as a future alternative to reduce carbon emission & move people quickly from a to b.

Reopen passenger rail to Lyttelton (Cruise-ships), Rolleston, Rangiora, Lincoln

Safe cycleway to Lincoln.
Stop rampant development in areas w/ poor road / no rail bus routes.

Have your say

Heritage Plan Change 13

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

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

Medium density subdivision

My submission is that:*

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

Both low density & medium density need to retain established trees. I am seeing a lot of clear felling of trees in suburbs that have well established trees up to 100 years old. Given our loss of biodiversity and the benefits of trees (health, biodiversity, shade, privacy, noise reduction) clear felling needs to be stopped. Pollution, noise. Plus commitment by council to reduced carbon emissions.

I seek the following decision from the Council:*

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

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

That a moratorium be placed on clear felling of sections in all subdivisions and rebuilding in all Christchurch zones.

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

05/05/2023

First name:


Evelyn

Last name:

Lalahi

Preferred method of contact

Attached Documents

Name	
Lalahi	

Mulder, Andrea

From: Evelyn & Sione Lalahi <selalahi@gmail.com>
Sent: Friday, 5 May 2023 9:06 am
To: Engagement
Subject: Feedback on Our proposed Housing and Business Choice Plan Change (PC14) / 531

Re PC14 : Sunlight Access.

My concern re densification is..

- ANGLES OF SUN ONTO NEIGHBOURING PROPERTIES.

Many developments do take this into account, but many do not.

This is primarily a WINTER issue, though not entirely.

Most new residential buildings have good sunlight access for their own needs.

BUT when a 2-3 story building cuts off, for example, morning sun on the northeast, there is frequently a loss of both light and heating for several hours.

This causes deprivation for existing homes, resulting in..

- increased power bills
- increased dampness in both houses and gardens.
- changes in life habits and loss of wellbeing for some.
- potentially loss of property value for future sale.

Many of those affected are senior citizens and young families.

Yours sincerely
Evelyn Lalahi.

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Denis


Last name:

McMurtrie

Preferred method of contact

Email

Attached Documents

Name	
Denis McMurtrie submission	

Save time and do it online

ccc.govt.nz/haveyoursay

Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

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

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

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

* Required information

Name* Denis McMurtrie

Address* 81 Paparoa St Postcode* _____

Email mcmurtrie@extra.co.nz Phone no. _____

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

Organisation's name _____

Your role Resident

Trade competition and adverse effects* (select appropriate)

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

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

(a) adversely affects the environment, and

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

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

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

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

☒ I wish to speak in support of my submission on Plan Change 14

☐ I do not wish to speak.

Joint submissions (Please tick this box if you agree)

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

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

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

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

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

Denis McMurtrie

with Colin McGavin
of m. m. m.

Have your say

Heritage Plan Change 13

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

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

The impact of MDH on the drainage infrastructure on Paparua St. and the removal of Paparua St from being rezoned away from ^{high} residential

My submission is that:*

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

See on separate sheet submission (1) - (11 Pages)

I also support Colin McSwain's Submission including
+ his Final Decision sought. (P3 of his submission)

I seek the following decision from the Council:*

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

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

No Rezoning on Paparua St,

✓

g.f.m.

Submission ①

Parts of the infrastructure of Paparoa St are too fragile to accommodate high density residential development.

- ② *Steven Bensburg in a report to the CCC in 2015 stated: "I am familiar with the Cranford Basin area and the wider land drainage system and the requirements for the Cranford Basin for storm water purposes" (③ page 1" UDCCD-Upper Dudley Creek Diversion) which intercepts Dudley Creek at the Paparoa St Culvert and diverts 2.5 m³/s from a 1350mm pipeline in Paparoa St and discharges water into the main UDCCD channel which runs through Cranford Basin.(p4) Local peaty soil in the Paparoa area has meant ground levels have settled by an average of 20mm per year"

Having lived at No 87 Paparoa Street from 1982 to 2010 and at No 81 ever since, I remember the distinct bands of peat and sand evident in the soil profile when the 1350 mm pipeline was installed in 1985. Over my 41 years in the street, I have personally observed and experienced the aforementioned continual settling and subsequently ground shaking especially when old houses are repaired and re-piled, and pile driving occurs when new buildings are constructed.

It is of considerable concern to the current residents that the foundation construction of up to 6 story dwellings (④ see submission "Land use -Geology") will impact the old culvert buried in the peat and sand and exacerbate the sinking to even more than 20mm per year. In addition, the proximity of larger and heavier buildings and even, the considerable increase in traffic since 1985, could make the situation worse. Even more importantly: if the vital culvert is damaged and drainage system compromised, down-stream flooding will increase.

Decision Sought: No Re Zoning of Paparoa St.

- ① submission report.
- ② Bensburg report.
- ③ " " page 1 UDCCD creek diversion.
- ④ Land use geology Page 2 - Colin McGevin submissions.

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* (2)

**BEFORE CANTERBURY REGIONAL COUNCIL AND
CHRISTCHURCH CITY COUNCIL
AT CHRISTCHURCH**

In the matter of the Resource Management Act 1991

And

In the matter of Notices of Requirement by Christchurch City Council
and New Zealand Transport Agency for designations
for Northern Arterial, Northern Arterial Extension and
Cranford Street Upgrade

And

In the matter of Related Resource Consent Applications

**STATEMENT OF EVIDENCE OF STEPHEN DAVID BENSBERG FOR
CHRISTCHURCH CITY COUNCIL**

Dated 8 April 2015

BUDDLE FINDLAY
NEW ZEALAND LAWYERS

Barristers and Solicitors
Christchurch

Solicitor Acting: **Kerry Smith**
Email: kerry.smith@buddlefindlay.com
Tel 64-3-379 1747 Fax 64-3-379 5659 PO Box 322 DX WX11135 Christchurch 8140

[Handwritten signature]

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.

the proposed stormwater quality treatment works, the need for the provision of compensatory flood storage and how this can be provided.

8. I will also comment on issues that have been raised by submitters and by Council's planning officer in his/her Section 42A report.

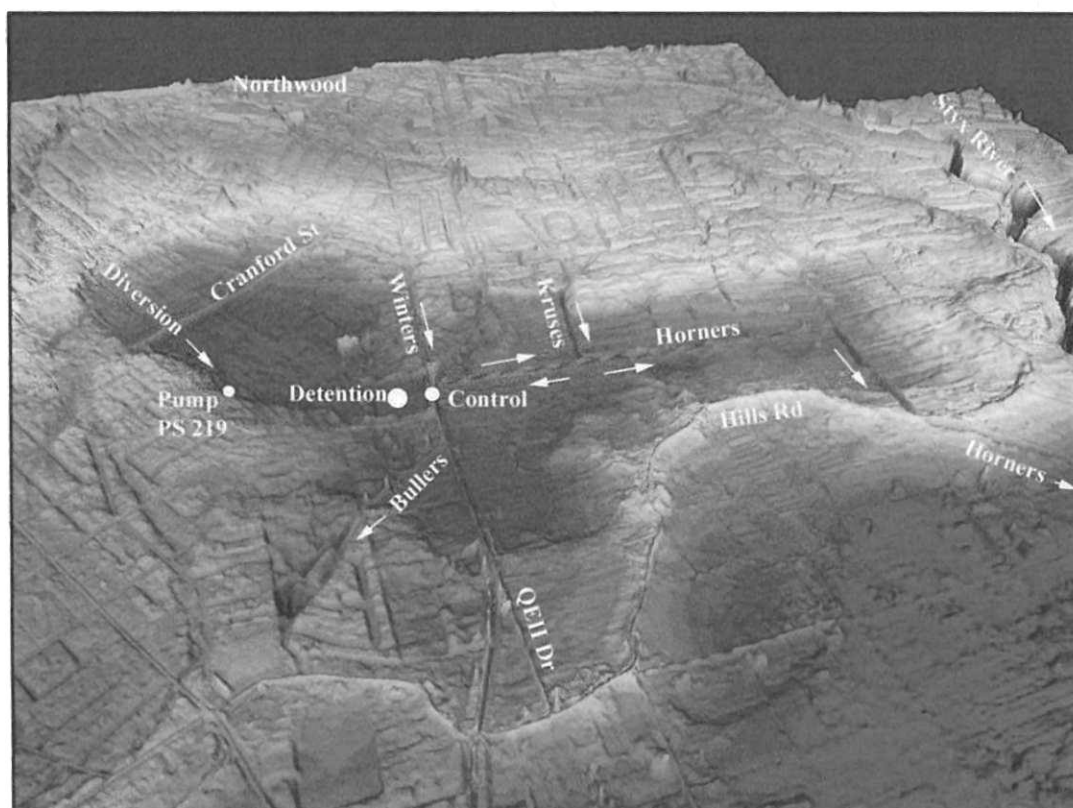
DETAILED DESCRIPTION OF PROPOSAL

9. A description of the proposal and its inclusion within the Styx SMP as a natural ponding area is provided by Mr Couling.

DESCRIPTION OF SITE,

10. A description of the Cranford Basin is detailed in the evidence of Mr Couling.
11. Figure **SDB1** is a 3D image generated from LiDAR (Light Detection and Ranging) aerial survey data, showing the Cranford 'basin' shape and the outlet at Bullers Drain.

Figure SDB1: 3D image of Cranford basin



* 3

DESCRIPTION OF STORMWATER NETWORK

12. The Cranford Basin is drained by a combination of council utility drains and local farm drains. Two council drains, Tysons Drain and Winters Road Drain are located on the western and northern sides of the Cranford Basin (Cranford West & East areas). These drains intercept runoff from the west and north and convey the runoff around the Cranford Basin west and east areas to Bullers Drain on the eastern side of Philpotts Road, which then discharges to the lower Dudley Creek Diversion (DCD). The local farm drains within the Cranford West discharge directly to the **Upper Dudley Creek Diversion (UDCD)**. The local farm drains within the Cranford East are connected to the Croziers Drain, a public utility drain, which then discharges to the UDCD via a 375mm Pipe and weir at Pumping Station 219.
13. Figure **SDB2** is a plan of the local drainage network in the Cranford Basin West & East areas and include:

SDB2: Local Drainage Network



- (a) Tysons Drain, flows in a north-easterly direction from Grassmere Street to Winters Road. It serves a mix of rural and urban land uses. A weir at

Cranford Street allows a limited discharge to drain down Cranford Street West Drain to UDCD.

Tysons Drain, intercepts stormwater runoff from the north-west of Cranford Basin and joins Winters Road Drain before the combined flow discharges into Bullers Drain.

- (b) Winters Road Drain, flows along the southern boundary of Winters Road from Tysons Drain to Bullers Drain on the east side of Philpotts Road.
 - (c) UDCD intercepts Dudley Creek at the Paparoa St culvert and diverts up to 2.5 m³/s into a 1350mm pipeline in Paparoa St. The pipeline picks up the flow from Papanui Drain and discharges into the main UDCD channel which runs through Cranford Basin. The flow from this channel is then pumped by Pump Station (PS) 219 into another pipeline that discharges into the main Dudley Creek Diversion at Philpotts Road.
 - (d) Croziers Drain discharges into UDCD immediately upstream of PS 219. It runs through the lowest part of the basin to drain pastoral land.
 - (e) Cranford Street West Drain flows along the western boundary of Cranford St from Tysons Drain to UDCD.
 - (f) Cranford Street East Drain flows along the eastern boundary of Cranford St and discharges into UDCD.
14. PS 219 provides the necessary lift to allow the stormwater to discharge via the Philpotts Road pipeline to the main Dudley Creek Diversion. The DCD then discharges to Horseshoe Lake and then the Avon River.
15. Because this area is lower than the surrounding land a pumping station is required to 'lift' the stormwater up out of the basin into the council land drainage network. If the pumping station was not present to maintain ground water levels and provide flood mitigation the Cranford Basin area would experience permanent ponding.

FLOOD HISTORY & OPERATION OF FLOOD STORAGE

16. Historical pre-urban flooding in the Cranford Basin area was due to a combination of factors including high rainfall and associated runoff flowing into the Cranford Basin area, high flood levels in the receiving environment (Dudley Creek), a lack of capacity in the natural drainage channels and back water effects would have resulted in large open areas of ponded water.

Colin M^cGavin submissions:

Our submission:

1 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

2 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.

3 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

4 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.

5 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.

6 ~~6~~ 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?

7 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.

8 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.

9 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

10 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.

11 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.MainNorthRoad-1.Jan2008.jpg and Photo08.MainNorthRoad-1.Aug2022.jpg, Photo09.LangdonsRoad.Jan2008.jpg and Photo10.LangdonsRoad.Aug2022.jpg.

12 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.

of m

Urban Design - Better Alternatives Available

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Regardless of Government Requirements, this will surely lead to the destruction of Christchurch's "Garden City" reputation.

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Decisions Sought:

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Our proposed Housing and Business Choice Plan Change (14)

[Submitter Details](#)**Submission Date:** 03/05/2023**First name:** Anton**Last name:** Casutt**Preferred method of contact** Postal

Attached Documents

Name
Anton Casutt submission PC14 Redaction please 

Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

* Required information

Name* Anton Casutt
 Address* 9 Johnson St, Sydenham Postcode* 8023
 Email _____ Phone no. _____

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

Organisation's name _____

Your role _____

Trade competition and adverse effects* (select appropriate)

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

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

(a) adversely affects the environment, and

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

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

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

- ☒ I wish to speak in support of my submission on Plan Change 13 – don't want to speak on this
☐ I wish to speak in support of my submission on Plan Change 14
☐ I do not wish to speak.

Joint submissions (Please tick this box if you agree)

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

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

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

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

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

Signature Anton Casutt Date 03/05/2023

Have your say

Housing and Business Choice Plan Change 14

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

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

Residential building intensification
in the suburbs

My submission is that:*

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

I oppose residential building intensification in the suburbs. — 1) How can you enjoy your property if you have

- Reasons residential building intensification either side of you
- 2) More noise ^{prevent to be detrimental to people's health}
 - 3) Lack of privacy
 - 4) Less sunlight
 - 5) More shading
 - 6) A decrease in health and wellbeing for people and animals because
 - 7) more input from neighbours not less. More power for neighbours.
 - 8) less demand for your property if you have intensive residential housing either side of you
 - 9) identical housing
 - 10) Lack of soundproofing
 - 11) methodology of building and land stabilisation
 - 12) Noise of building and shaking of ground from land stabilisation
- I seek the following decision from the Council:*
- (Please give precise details stating what amendments you wish to see made to the proposed Plan Change.
Please continue on separate sheet(s) if necessary.)
- of less space and less sunlight and more noise
- 13) Lack of enforcement of rules

- 1) more rules for noise control and better enforcement of all rules
- 2) more ^{power and} input from neighbours not less.
- 3) more consideration for neighbours when there is building work being done or land stabilisation work
- 4) A change in methodology including garages and accessory buildings.
- 5) Rules for people and animals living in residential intensification builds
- 6) ~~more~~ sound proofing in new builds also in ceilings and garages and accessory buildings

Our proposed Housing and Business Choice Plan Change (14)

Christchurch
City Council



Submitter Details

Submission Date:

12/05/2023

First name:

Marie

Last name:

Gray



Organisation:

Summit Road Society

Preferred method of contact

Email

Attached Documents

Name	
Summit 1 of 2	
Summit 2 of 2	

Mulder, Andrea

From: Secretary Summit Road Society <summitroadsocietysecretary@gmail.com>
Sent: Friday, 19 May 2023 10:50 am
To: INPC Business Support
Subject: Re: query please
Attachments: SRS Submission CCC District Plan changes Apr23.docx

Hi Andrew, thank you for getting back to me.
Here is our submission. Please let me know if you need it in a different format.

Thank you very much for your help,
Marie

Marie Gray
Secretary
Summit Road Society

(03) 3493409
027 4702020

On Fri, 19 May 2023 at 10:27, INPC Business Support <INPCBusinessSupport@ccc.govt.nz> wrote:

Hi Marie

Sorry to take so long to get back to you on this and the trouble you had with our system

Can you please just email me your submission on behalf of the Summit Road Society and we will backdate it to the 12th of May.

Kind regards

Andrea Mulder

Senior Planning Support Officer
Development Support Team




03 941 5076 027 707 8227




Andrea.Mulder@ccc.govt.nz



Te Hononga Civic Offices, 53 Hereford Street, Christchurch

 PO Box 73013, Christchurch 8154

 ccc.govt.nz



From: Secretary Summit Road Society <summitroadsocietysecretary@gmail.com>

Sent: Sunday, May 14, 2023 3:40 PM

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

Subject: query please

Kia ora,

Can you please confirm if the Summit Road Society's submission on the district plan changes 13 and 14 went through OK on Friday. I normally get a confirmation email although it's sometimes delayed and/or spammed. I was having technical issues with the submissions portal and I had to try several times but it seemed to go through in the end. I've checked my inbox and spam and no confirmation as yet.

Regards,

Marie

Marie Gray

Secretary

Summit Road Society

(03) 3493409

027 4702020

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

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

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





a passion for the Port Hills

Our Hills, Our Heritage

The Summit Road Society is a grassroots conservation charity based in Christchurch. The Society was formed in 1948 to further the vision of Harry Ell to preserve and protect the Port Hills and provide for public access. We own and manage four reserves on the Port Hills and also lead the backyard and community trapping project 'Predator Free Port Hills'. Thank you for the opportunity to provide feedback on the changes to the District Plan.

Feedback on Plan Change 13 and 14

- We are pleased to see no change to the existing residential areas on the Port Hills. The Society has a long history of opposition to development on the open space areas of the Port Hills. We want to ensure that the ecological, landscape and recreational benefits of the hills are maintained for future generations.
- We support the following items as qualifying matters:
 - Matters of national importance including sites of cultural, heritage and ecological importance, areas of high-risk natural hazards and significant trees.
 - Public open space areas
- We cannot comment on the other qualifying matters as they are outside the mandate of the Summit Road Society. However, we support action on climate change to lower emissions and note that intensification done well is a key strategy to achieve this. We also want to ensure that intensification of housing is in line with the special character of the Port Hills including cultural, heritage, ecological and recreational values and considers hazards such as rockfall risk, coastal erosion and inundation, flooding, slips and risk of wildfires.
- We note that while most of the Port Hills is likely to be covered by the public transport accessibility qualifying matter in the short term, this may change over time as public transport routes increase. This is why we need a Port Hills plan. This would enable the recreational, ecological and cultural values of the hills to be recognised and provide for integrated management of issues around sediment, reforestation, biodiversity, recreation, erosion, fire risk, housing and anti-social behaviour.
- We value protecting our existing tree canopy cover. Christchurch has a low tree canopy cover compared to other cities and it is important that existing mature trees are retained. Trees sequester carbon, they provide shade and shelter, they provide habitat for birds and invertebrates and they support recreational and community wellbeing. We therefore support the inclusion of Significant Trees as a qualifying matter and we would like to see the Financial Contribution structured to incentivise keeping existing mature trees.
- That being said there may be valid reasons for removing mature trees for safety or ecological reasons. For example, some exotic tree species are considered weed species in high biodiversity areas of the Port Hills. A tree on a residential property may be a significant seed source and on balance, the environmental risks outweigh the environmental benefits the mature tree brings.



a passion for the Port Hills

We would like to ensure that there is a pathway to allow for removal of mature trees in these situations.

- We support the proposal to use the Financial Contribution process to ensure a tree canopy cover however would like to see it increased from 20% to 25%. Currently Christchurch City only has 13.56% canopy tree cover. Canopy tree cover is 30.6% in Wellington. We also support an increase to 25% tree canopy cover in road reserves.
- We would like to see prioritisation of native plantings wherever possible. Backyard biodiversity helps support ecological restoration across the city and creates food and habitat for native fauna.
- We would like the Financial Contribution expanded to include riparian planting along waterways including small creeks. Riparian planting along waterways helps reduce erosion and sediment runoff and enhances habitat for native fauna. Riparian planting usually includes a mixture of trees, grasses and shrubs.
- It is a vital that housing development on the hills does not lead to increased sedimentation into our waterways and there are appropriate regulatory tools and compliance in place.