

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 01/05/2023

First name: Ross **Last name:** Pheloung

Preferred method of contact Email

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City: Christchurch

Country: New Zealand

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

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

Note to person making submission:

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

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

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 01.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

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

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

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

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

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

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

My submission is that

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

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

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

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Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 01/05/2023

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Preferred method of contact Email

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Suburb: Russley

City: Christchurch

Country: New Zealand

Postcode: 8042

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Additional requirements for hearing:

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File

CCF20230501_0001

Z. J. Wang

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

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

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

Solution: Develop the urban-rural fringe around Christchurch

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

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

there was no choice but to increase the property Rates.
 money would come from the property Rates of Christchurch residents, so
 more excavations and road closures. It would be a huge investment and the
 growth (next 30 years), so infrastructure improvements will be costly -
 sewerage, will not be able to withstand the massive imminent population
 1 The old urban infrastructure, including power systems, domestic water and

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

Dear Sir/Madam,

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 01/05/2023

First name: Damian **Last name:** Blogg

Preferred method of contact Email

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Suburb: Avonhead

City: Christchurch

Country: New Zealand

Postcode: 8042

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Daytime Phone: 0212533887

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I object to plan change 14

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

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

Our proposed Housing and Business Choice and Heritage Plan Changes (13 & 14)

Submitter Details

Submission Date: 01/05/2023

First name: Ann **Last name:** Clay

Preferred method of contact Email

Postal address: 15 Kyeburn Place

Suburb: Avonhead

City: Christchurch

Country: New Zealand

Postcode: 8042

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Submitter Details

Submission Date: 01/05/2023

First name: Jenny **Last name:** Smith

Organisation: Te Whare Roimata

Preferred method of contact Email

Postal address: 274 Gloucester Street

Suburb: Christchurch Central

City: Christchurch

Country: New Zealand

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Email: tewhareroimata274@gmail.com

Daytime Phone: 0273498855

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TWR Housing Bus Choice Plan 14 Appendix I

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

Submission 3 May 2023

Continuation Sheet

1) The Specific Provisions of the Plan Change that our submission relates to are as follows:

- a. High-Density Residential Zone
- b. Financial Contributions
- c. Inclusionary Zoning – refer Section 32 Evaluation Report Part 3:2.10 – 3.2.12

Continuation of Our Submission is that.....

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

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

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

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

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

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

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

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

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

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

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

Our proposed Housing and Business Choice and Heritage Plan Changes (13 & 14)

Submitter Details

Submission Date: 01/05/2023

First name: Karyn **Last name:** Butler

Preferred method of contact Email

Postal address: 28 Watford Street

Suburb: Strowan

City: Christchurch

Country: New Zealand

Postcode: 8052

Email: karynbutler1@gmail.com

Daytime Phone: 021 055 2521

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Original Submitter:

Original Point:

Points: 06.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

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

My submission is that

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

Original Submitter:**Original Point:****Points:** 06.2

- Support
- Oppose
- Seek Amendment

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Original Submitter:**Original Point:****Points:** 06.3

- Support
- Oppose
- Seek Amendment

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My submission is that

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Original Submitter:**Original Point:****Points:** 06.4

- Support
- Oppose
- Seek Amendment

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Original Submitter:

Original Point:

Points: 06.5

- Support
- Oppose
- Seek Amendment

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Original Submitter:

Original Point:

Points: 06.6

- Support
- Oppose
- Seek Amendment

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

My submission is that

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

Original Submitter:**Original Point:****Points:** 06.7

- Support
- Oppose
- Seek Amendment

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Original Submitter:**Original Point:****Points:** 06.8

- Support
- Oppose
- Seek Amendment

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Original Submitter:**Original Point:****Points:** 06.9

- Support
- Oppose
- Seek Amendment

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Original Submitter:

Original Point:

Points: 06.10

- Support
- Oppose
- Seek Amendment

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Original Submitter:

Original Point:

Points: 06.11

- Support
- Oppose
- Seek Amendment

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Original Submitter:**Original Point:****Points:** 06.12

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- Seek Amendment

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Original Submitter:**Original Point:****Points:** 06.13

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Attached Documents

File
Transport

File
Amenity and Character
Conclusion

AMENITY/CHARACTER

Relevant PC14 clause references and extracts are given in italics:

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

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

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

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

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

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

proposed in Plan Change 14.

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

Relevant PC14 clause references and extracts are:

Section 14.2.7 Objective – High Density Residential Zone

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

Section 14.2.7.2 Policy – High density location

a. Enable high density residential development within walking catchments of the:

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

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

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

Conclusion

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

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

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

TRANSPORT

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

1. INFRASTRUCTURE

Relevant PC14 clause references and extracts are given in italics:

Section 14.2.8.5 Policy – Infrastructure servicing for developments

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

Section 14.2.8.6 Policy – Integration and connectivity

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

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

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

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

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

Relevant PC14 clause references and extracts are:

Section 7.2.1.2 Policy – High trip generating activities

ix provide for the transport needs of people whose mobility is restricted

Section 7.2.1.5 Policy – Design of Carparking areas and loading areas

iii be accessible for people whose mobility is restricted

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

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

This impact will be significant on both

- existing residents and
- residents living in new developments

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

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 01/05/2023

First name: Heather **Last name:** Woods

Preferred method of contact Email

Postal address: PO Box 5201

Suburb: Papanui

City: Christchurch

Country: New Zealand

Postcode: 8542

Email: hjwoods@gmail.com

Daytime Phone: 021 288 9618

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 07.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

My submission is that

See submission attached.

Attached Documents

File
Heather Woods submission attachment

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 01/05/2023

First name: Heather **Last name:** Woods

Preferred method of contact Email

Postal address: PO Box 5201

Suburb: Papanui

City: Christchurch

Country: New Zealand

Postcode: 8542

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Daytime Phone:

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

I am not
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Note to person making submission:

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

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

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 07.2

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

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

- b. any erection, reconstruction, placement, alteration or demolition of any structure or part of any structure within, on, under or over the land; and
- c. any vehicle, trailer, tent, marquee, shipping container, caravan or boat, whether fixed or moveable, used on-site as a residential unit or place of business or storage.

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

My submission is that

Gives effect to Chapter 3 Strategic Directions Objectives:

Christchurch Central Recovery Plan

Medium Density Zone becomes high density

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

Land Use Recovery Plan = LURP

Residential Suburban Zone

NOT ONLY Residential Suburban Density Transition Zone

Original Submitter:

Original Point:

Points: 07.3

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

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

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

My submission is that

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

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

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

Original Submitter:
Original Point:

Points: 07.4

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

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

My submission is that

3.2.2 A city in transition

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

3.2.4 Longer-term population change. a. Whilst there is uncertainty about the rate of recovery and growth, on current projections Christchurch will need to accommodate and provide services for a population that is still expected to grow by approximately 130,000 people by 2041. The demographic composition of the district is also projected to change significantly during the next 30 years. Like the rest of New Zealand, the district's population is ageing. The proportion of those aged 65 years and over will increase, nearly doubling in number by 2031. b. Population growth, ageing and increasing cultural diversity will result in demands for additional housing (with a range of housing types and locations), commercial facilities and services, and infrastructure (such as transport), as well as changing the demand for community services

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

Original Submitter:
Original Point:

Points: 07.5

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

My submission is that

6.1A Qualifying matters

6.2 Temporary Activities, Buildings and Events

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

6.2.4.1.3 Restricted discretionary activities

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

6.2.5.1 Amenity

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

Original Submitter:

Original Point:

Points: 07.6

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

My submission is that

14.4.1.1 Permitted activities

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

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

Original Submitter:

Original Point:

Points: 07.7

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

My submission is that

14.4.2.3 Building height

a. The maximum height of any building shall be:

i. All buildings unless specified below: 8 metres

Original Submitter:

Original Point:

Points: 07.8

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

I accept these criteria PROVIDING:

a) social housing complexes, and groups of older person's housing units where all the buildings are single storey may be developed by Community Minded Private Companies. Not just not for profit agencies and government agencies. Private Companies can provide this type of housing using transportable houses in a much more timely and cost efficient manner than the agencies currently preferred by CCC. Community Facilities such as a Communal Hall, plus storage, yard space, clotheslines, parking would still all be provided .

My submission is that

14.4.2.4 Site coverage

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

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

14.4.2.5 Outdoor living space

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

Original Submitter:

Original Point:

Points: 07.9

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

My submission is that

14.13 Rules — Enhanced Development Mechanism

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

Original Submitter:

Original Point:

Points: 07.10

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

My submission is that

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

Original Submitter:

Original Point:

Points: 07.11

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

CCC TO AMEND TO READ:

A. 800 metres EDM walking distance of:

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

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

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

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

My submission is that

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

Original Submitter:

Original Point:

Points: 07.12

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

WHAT I WANT CCC TO DO:

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

My submission is that

14.13.2.5 Non-complying activities

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

Original Submitter:

Original Point:

Points: 07.13

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

My submission is that

14.13.3.5 Minimum unit size, and mix of units

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

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

14.13.3.7 Outdoor living space

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

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

Original Submitter:
Original Point:

Points: 07.14

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area I support this section, providing CCC is to include Transportable Homes Hubs within this criteria.

My submission is that

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

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

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

14.13.3.10 Acoustic insulation

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

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

Original Submitter:
Original Point:

Points: 07.15

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

My submission is that

14.14 Community Housing Development Mechanism

Has been entirely deleted.

Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 01/05/2023

First name: Heather **Last name:** Woods

Preferred method of contact Email

Postal address: 108 Butchers Road, RD 2

Suburb:

City: Kaiapoi

Country: New Zealand

Postcode: 7692

Email: hjwoods@gmail.com

Daytime Phone: 021 288 9618

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 07.16

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

please see attached

My submission is that

please see attached

Attached Documents

File
Sub Plan Change 14 CCC 2023-05-11 Heather

**SUBMISSION
PLAN CHANGE 14 CHRISTCHURCH CITY COUNCIL**

Heather Woods
P O Box 5201 Papanui, Christchurch 8542
phone 021 288 9618
Prefer you contact me by email: hjwoods@gmail.com.

**Chapter
two definitions**

**Gives
effect to Chapter 3 Strategic Directions Objectives:
Christchurch
Central Recovery Plan
Medium
Density Zone becomes high density
Need
*the availability in all areas in order to deliver on the objective of VARIETY of choice,
location, type*
Land
Use Recovery Plan = LURP
Residential
Suburban Zone
NOT
ONLY Residential Suburban Density Transition Zone**

**WHAT
I WANT CCC TO DO**

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

- a.
any structure or part of a structure, whether permanent, moveable or immovable; and/or
- b.
any erection, reconstruction, placement, alteration or demolition of any structure or part of any structure within, on, under or over the land; and
- c.
any vehicle, trailer, tent, marquee, shipping container, caravan or boat, whether fixed or moveable, used on-site as a residential unit or place of business or storage.

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

**Chapter
3 Strategic Directions Objectives.**

3.1.b.C.v.

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

B.

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

E.

providing for a wide range of housing types and locations;

WHAT

I WANT CCC TO DO

For the inclusion of Transportable Homes to be included in all discussions regarding housing. This type of 2 BR housing has been proven to be durable, built within 2 weeks, priced under \$180,00, It is easily located onto a site, and suitable for a wide range of uses. Use of this type of housing will help the objectives above to be met more quickly and easily.

3.2.2

A city in transition

e.

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

3.2.4

Longer-term population change. a. Whilst there is uncertainty about the rate of recovery and growth, on current projections Christchurch will need to accommodate and provide services for a population that is still expected to grow by approximately 130,000

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

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

3.3.4

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

term: 18,300 dwellings between 2021 and 2031; and ii. long term: 23,000 dwellings between 2031 and 2051; and iii. 30 year total: 41,300 dwellings between 2021 and 2051; and b. There is a range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents, including: i. a choice in housing, types, densities and locations.

WHAT

I WANT CCC TO DO:

To

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

NZ

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

6.1A

Qualifying matters

6.2

Temporary Activities, Buildings and Events

iii.

reinforce or promote a positive sense of place and community.

6.2.4.1.3

Restricted discretionary activities

6.2.5

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

6.2.5.1

Amenity

a.

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

WHAT

I WANT CCC TO DO:

That

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

6.10A

Tree Canopy Cover and Financial Contributions

6.10A.4.1 Activity

status tables

14.4.1.1

Permitted activities

a.

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

P1

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

WHAT

I WANT CCC TO DO:

These

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

to include

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

14.4.2.3

Building height

a.

The maximum height of any building shall be:

i.

All buildings unless specified below: 8 metres

WHAT

I WANT CCC TO DO:

To

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

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

14.4.2.4

Site coverage

a.

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

ii.

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

14.4.2.5

Outdoor living space

iii.

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

WHAT

I WANT CCC TO DO:

I

accept these criteria PROVIDING:

a)

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

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

.

14.13

Rules — Enhanced Development Mechanism

14.13.1.1

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

WHAT

I WANT CCC TO DO:

For

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

14.13.1.2

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

Housing yield qualifying standards a. Comprehensive development of a site shall deliver

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

WHAT

I WANT CCC TO DO:

Permit

this development in all Residential Suburban and Medium Density Zones.

14.13.1.4

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

CCC

TO AMEND TO READ:

A.

800 metres EDM walking distance of:

I.

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

II.

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

B.

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

C.

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

14.13.2.5

Non-complying activities

a.

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

WHAT

I WANT CCC TO DO:

Delete

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

14.13.3.5

Minimum unit size, and mix of units

a.

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

Number

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

14.13.3.7

Outdoor living space

a.

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

i.

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

WHAT**I WANT CCC TO DO:**

/

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

b.

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

14.13.3.8

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

ii.

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

14.13.3.10**Acoustic insulation**

b.

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

14.13.3.12

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

WHAT**I WANT CCC TO DO:**

/

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

14.14**Community Housing Development Mechanism****Has****been entirely deleted.**

want CCC to reinstate this subject. The development of this type of accommodation is vital at a time when affordable, accessible, housing is urgently needed, and there is an ageing population. This type of housing must be able to be developed by private companies who have an interest in Community Wellbeing. Not just local bodies, government, or not for profit organisations. Transportable Homes companies can provide

comfortable, durable, attractive housing, in a Community Environment, for a very affordable price, and must be permitted to develop such projects in any zone. This fits with the intention of this plan change to enable a variety of locations, density, and types of housing. It also enables people to stay in their own communities, strengthening social cohesion and personal wellbeing.

Submissions:

Chapter 14 Residential: 14.4.1.1 Permitted activities

Seek Amendment

My submission is that

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

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

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

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

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

Therefore, the current net floor area requirements also do not meet the District Plan's Objectives, e.g. "3.3.4 Objective - Housing bottom lines and choice: b. There is a 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 and Heritage Plan Changes (13 & 14)

Submitter Details

Submission Date: 01/05/2023

First name: Charles **Last name:** Etherington

Preferred method of contact: Email

Postal address: 40 Cox Street

Suburb: Merivale

City: Christchurch

Country: New Zealand

Postcode: 8014

Email: charles@warrenforestry.com

Daytime Phone: +64274860708

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

Attached Documents

File

City Plan Change 14 for Housing Intensification 2023 Submission Opposing

Christchurch City Plan Change 14 for Housing Intensification in some suburbs

I oppose these plans entirely as they apply to the inner suburbs, for the reasons below. These reasons are all linked, and can be put under the key, over-arching head of:

Human Wellbeing. Is that not our highest ideal?

Environment & Health

Crowding does not improve our mental and physical health. *It does the opposite.* An intensively built-up environment is the opposite of what is good for our mental and physical health.

It creates stress and alienation and only if forced, will people live in crowded spaces. *It is unnatural.* Yes we are communal creatures, but we prefer not to live crowded. We are not insects or rodents!

The current plan to push intensive housing into our suburbs has no merit for our people at all. It is a bad idea born of delusions about what is good for us and the planet.

People prefer and need maximum sunlight exposure. *It is good for us.*

People prefer and need greenery right where they live, that they can tend. *It is good for them.*

It is good for us to have trees and shrubs and little vegie gardens that our ours to nurture and be in. Even if small. Only if forced to, will we do without. But at a cost to our mental and physical health.

These are age-old truths: That space, sunlight, and tangible greenery are fundamental to our wellbeing. This wisdom needs no scientific proof, but there is loads of that stacking up all the time these days. The evidence shows we'd be best living in savannah / forestland but can't all do so of course. The low-rise suburb is the next best thing.

Communal Resilience & Functionality

In the 2011 earthquakes all those in apartment type dwellings had to immediately abandon them, permanently. They became instantly homeless and dependent on the state, and some did not ever see their home or personal belongings again. Their entire infrastructure failed catastrophically.

Whereas in the suburbs everywhere, even in badly damaged houses and streets, residents could continue to live, and actually most thrived on the communal spirit generated. There was space to function without water, drainage or power for extended periods. Those were then patched up and made functional, but that was impossible in apartment-like buildings. People helped out their neighbours across all city suburbs. You can bring out the gas or wood BBQ into the street or garden. You can put up tents in the garden for refugees from city apartments. You can dig a long-drop! We did all of that in little Cox St in 2011.

The functionality of close but not crowded housing is utterly superior as infrastructure, as well as healthier for people to dwell in. Resilient and robust communities are best, and needed, maybe more so in future.

Historical & Philosophical

It seems to me that some planners and their bureaucratic colleagues have the delusion that the ideal cityscape is something like the lovely central parts of the old cities of Europe. With their charming piazzas and squares, boulevards and narrow cobbled streets. But they forget that these developed over a thousand years or so. And we are not them. We have a different history. We have a history of *space*, like they did a thousand+ years ago. They have become crowded and *have to* live close to

each other. And yes, in many cases they do a good job of it. But in fact, most Europeans live in depressing crowded apartments, unless they can afford to escape. Most people in Europe would probably prefer our type of housing, with its space. At least the ones I have spoken to clearly do.

So our history and our wonderful asset of space, and a small population, means not only we can have space to thrive in, we would be mad to emulate much of the developed (over developed) world.

Climate Change Alarmism & Town Planning Delusions

I note that the 'flavour of the month' excuse given for this carte blanche intensification plan is that it must be followed to lower our CO2 emissions.

How exactly? Show us the calculations please ... I don't think they exist.

Less travel is given as the key benefit which is said will lower emissions. It seems the planners have not yet heard of electric cars and buses and trains and trucks. Or hydrogen power. Or solar and wind and hydro power. No, they tell us we must lower our emissions now, by an intensive build of crowded housing, immediately. But will that do the trick? Well no, it will not.

Three plus storied dwellings usually require a lot of concrete and steel, but those are the most polluting materials there are, along with aluminium cladding (yuk) and plastics, common now in high-rise. So, intensification would, just from the buildings, increase emissions. If it was compulsory to build these entirely in wood it would not, but it isn't is it?

And then there is what is lost. Trees and gardens sequester a lot of carbon, above and below ground. So the more suburban areas of cities are carbon richer.

Really there is a better case for planning now for the day fossil fuels are replaced. Then ideally many could live on thousands of one hectare blocks out in the countryside, growing most of our own food among widely spaced trees, rather than crowded into tight cities. And that is not just environmentally better. Our *wellbeing* and *human flourishing* would be better.

Think of Your Children

Finally, what about children? What do they like and thrive on?

Space and greenery. We all know this. I grew up in a suburban 'quarter acre paradise' in Ilam. Most people had a small front garden and bit larger back yard. Children spent most of their free time playing together in these spaces. Here in Cox Street our children actually had, and still have a similar experience, be it in smaller, yet still adequate spaces.

Do not deprive future New Zealand children of that. It will destroy one of the remaining good things we have here.

We do not need to do this. So don't.

Scrap this plan for all but the actual centre city, and tell Wellington:

This is not for post-quake Christchurch's existing inner suburbs, so dump it!

Yes, intensification is appropriate in the very centre of our city. And some other open spaces perhaps. Those who desire it can build it and live there. There is loads of space to do it there, so get on with that and leave us be in our very functional, healthy and green, long established inner suburbs please.

This submission is from

Charles Etherington

Vivienne Levy

Asher, Hannah & Rifka Etherington

40 & 44 Cox St

Merivale Christchurch

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 01/05/2023

First name: Kaye **Last name:** Thomson

Preferred method of contact Postal

Postal address: 109 Papanui Street

Suburb: Papanui

City: Christchurch

Country: New Zealand

Postcode: 8053

Daytime Phone: 0211490894

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

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

Note to person making submission:

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

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

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 09.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

My submission is that

I oppose the HIGH DENSITY proposals for Papanui st because,

1/Papanui St is beyond quick walking distance from Northlands mall, impractical to carry a weekly grocery supply that far. Decision sought Propose the demarcation of High Density Residential Zone to be redrawn much

closer to Northlands Mall, so walking to shops is practical and achievable.

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

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

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

Thankyou for considering my objections.

Regards.

Kaye Thomson

Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 01/05/2023

First name: Marie **Last name:** Mullins

Preferred method of contact Email

Postal address:

Suburb:

City:

Country: New Zealand

Postcode:

Email: marie.mullins@hotmail.com

Daytime Phone: 021687994

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 10.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council***If seeking to make changes to a specific site or sites, please provide the address or identify the area***

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

My submission is that

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Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 01/05/2023

First name: Andrew **Last name:** Butler

Preferred method of contact Email

Postal address: 28 Watford Street

Suburb: Strowan

City: Christchurch

Country: New Zealand

Postcode: 8052

Email: andrew.butler@yahoo.com

Daytime Phone: 0272138048

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

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

Note to person making submission:

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

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

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 11.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

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

My submission is that

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

Original Submitter:**Original Point:****Points:** 11.2

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council***If seeking to make changes to a specific site or sites, please provide the address or identify the area***

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

My submission is that

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

Original Submitter:**Original Point:****Points:** 11.3

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council***If seeking to make changes to a specific site or sites, please provide the address or identify the area***

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

My submission is that

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

Original Submitter:**Original Point:****Points:** 11.4

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

My submission is that

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

Original Submitter:

Original Point:

Points: 11.5

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

My submission is that

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

Original Submitter:

Original Point:

Points: 11.6

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

My submission is that

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

Original Submitter:**Original Point:****Points:** 11.7

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council***If seeking to make changes to a specific site or sites, please provide the address or identify the area***

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

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

My submission is that

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

Original Submitter:**Original Point:****Points:** 11.8

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council***If seeking to make changes to a specific site or sites, please provide the address or identify the area***

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

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

My submission is that

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

File
Transport
Amenity and Character
Conclusion

TRANSPORT

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

1. INFRASTRUCTURE

Relevant PC14 clause references and extracts are given in italics:

Section 14.2.8.5 Policy – Infrastructure servicing for developments

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

Section 14.2.8.6 Policy – Integration and connectivity

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

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

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

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

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

Relevant PC14 clause references and extracts are:

Section 7.2.1.2 Policy – High trip generating activities

ix provide for the transport needs of people whose mobility is restricted

Section 7.2.1.5 Policy – Design of Carparking areas and loading areas

iii be accessible for people whose mobility is restricted

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

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

This impact will be significant on both

- existing residents and
- residents living in new developments

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

AMENITY/CHARACTER

Relevant PC14 clause references and extracts are given in italics:

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

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

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

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

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

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

proposed in Plan Change 14.

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

Relevant PC14 clause references and extracts are:

Section 14.2.7 Objective – High Density Residential Zone

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

Section 14.2.7.2 Policy – High density location

a. Enable high density residential development within walking catchments of the:

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

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

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

Conclusion

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

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

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

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 01/05/2023

First name: Nikki **Last name:** Smetham

Preferred method of contact Email

Postal address: 69 Cambridge Terrace

Suburb: Christchurch Central

City: Christchurch

Country: New Zealand

Postcode: 8013

Email: nikki@rmmla.co.nz

Daytime Phone: 0275326676

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

I am not
directly affected by an effect of the subject matter of the submission that :

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 12.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

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

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

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

My submission is that

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

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

Attached Documents

File

File

No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 01/05/2023

First name: Sally **Last name:** Wihone

Preferred method of contact Email

Postal address:

Suburb:

City:

Country: New Zealand

Postcode:

Email: spwihone@gmail.com

Daytime Phone: 0273063066

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

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

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 13.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

Oriana Crescent, Hornby Suburbs, main south road

My submission is that

Hello

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

Regards

Sally Wihone

Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 01/05/2023

First name: Connor **Last name:** McIver

Preferred method of contact Email

Postal address: Flat 2, 314 Gloucester Street

Suburb: Christchurch Central

City: Christchurch

Country: New Zealand

Postcode: 8011

Email: connormciver10@gmail.com

Daytime Phone: 021515451

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

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

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 14.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

My submission is that

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

Original Submitter:

Original Point:

Points: 14.2

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

My submission is that

Original Submitter:

Original Point:

Points: 14.3

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

My submission is that

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

Original Submitter:

Original Point:

Points: 14.4

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

My submission is that

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

Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 01/05/2023

First name: Baden **Last name:** McArdle

Preferred method of contact Email

Postal address: PO Box 9154, Tower

Junction

Suburb:

City: Christchurch

Country: New Zealand

Postcode: 8149

Email: baden67@icloud.com

Daytime Phone: +436644595053

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

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

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 15.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

My submission is that

Original Submitter:

Original Point:

Points: 15.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

My submission is that

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

Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 01/05/2023

First name: Russell **Last name:** Fish

Preferred method of contact Email

Postal address: 12 Virgil Place

Suburb: Northcote

City: Christchurch

Country: New Zealand

Postcode: 8052

Email: rjfishnz@yahoo.com

Daytime Phone: 0275349373

I could not
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Would you like to present your submission in person at a hearing?

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 16.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

My submission is that

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

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

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

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

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

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

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

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

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

I do not support the creation of the Industrial Interface "buffer zone" within the residential zone, and believe mitigation / buffering should be the responsibility of operators within industrial, and/or commercial zones

Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 01/05/2023

First name: Ian **Last name:** Tinkler

Preferred method of contact Email

Postal address: 186 Quinns Road

Suburb: Shirley

City: Christchurch

Country: New Zealand

Postcode: 8013

Email: ian.tinkler@xtra.co.nz

Daytime Phone: 0226012348

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

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directly affected by an effect of the subject matter of the submission that :
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Would you like to present your submission in person at a hearing?

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 17.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

My submission is that

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

There are some concerns with the general plan:

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

Attached Documents

File

No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 01/05/2023

First name: Ian **Last name:** Thompson

Preferred method of contact Email

Postal address: PO Box 36307

Suburb: Merivale

City: Christchurch

Country: New Zealand

Postcode: 8146

Email: ian@dmr.co.nz

Daytime Phone: 027 497 8804

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

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

Note to person making submission:

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

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

Additional requirements for hearing:

Attached Documents

File

Spreydon Lodge Ltd



danne mora residential

1.0 Introduction

1.1 Submitter details

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

- 20 Monsaraz Boulevard, Halswell, Christchurch

1.1.1 Submission contact

The contact for this submission is:

Ian Thompson
Danne Mora Holdings Ltd
P O Box 36-307
Merivale, Christchurch 8145
T: 027 497 8804
E: ian@dmr.co.nz

1.2 Trade competition declaration

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

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

1.3 Hearing options

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

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

2.0 Submission details

2.1 Provisions to which the submission relates

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

2.2 Position on the provisions

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

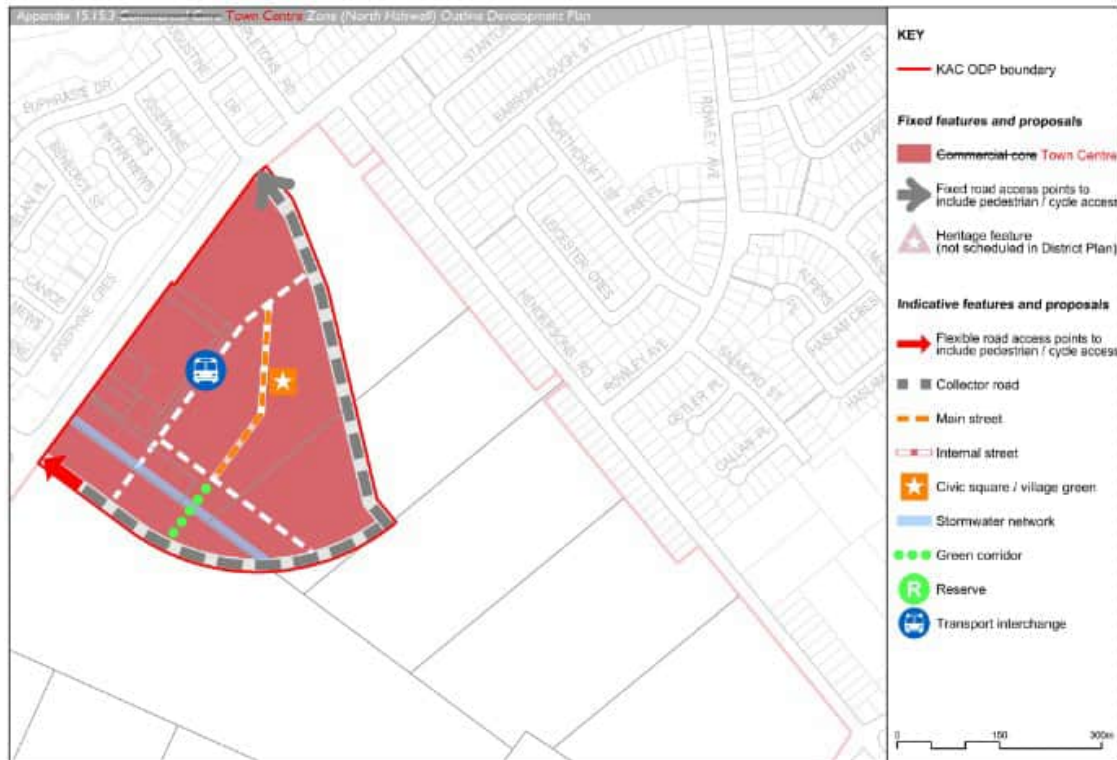


Figure 1: ODP for North Halswell at Appendix 15.15.3

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

2.3 Reasons for submission

RMA/2017/3185

- Landuse and subdivision resource consent has been granted for a residential and commercial mixed-use development of land at 201 Halswell Road, North Halswell, Christchurch (referenced RMA/2017/3185).
- The key commercial elements of the proposal as illustrated on stamped approved plans¹ include:
 - The creation of two development lots for mixed use and commercial development in the northwest corner of the site;
 - The enhancement and naturalisation of days drain extending along most of the northern boundary for a length of approximately 680m;

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

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

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

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

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

Qualifying Matters

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

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

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

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

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

3.0 Decision the submitters’ want Council to make

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

- Delete reference to main street at Clause 8.10.4.C (a)(i) ‘Development Form and Design’ as follows:

8.10.4.C Development Form and Design

a. The following design elements and features are relevant considerations in exercising control over the matters in Rules 8.7.1 - 8.7.4 or the matters for discretion in 8.8. They are not requirements for the purposes of Rule 8.6.11(a) or Rule 14.12.2.16.

i. This development area ~~new neighbourhood~~ is to be established around the Key Activity Centre (zoned ~~Commercial Core~~ Town centre) proposed as a mixed use village ~~centred focused around a main street~~. This will form a focus for the community.
- Delete the main street, civic square/village green and green corridor from the ODP for North Halswell (contained at Appendix 15.15.3 Town Centre Zone (North Halswell) ODP).

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

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

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

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

~~15.1314.4.3.2 Commercial layout~~

a. The extent to which development:

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

~~*i ii. supports a retail mix (large format and finer grain retailing) which ensures the centre meets its role as a District Town Centre and Key Activity Centre and meets the needs of the catchment population; and*~~

~~*ii iii. functions operationally and visually as an integrated commercial entity.*~~

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

~~15.1314.4.3.4 Transport~~

a) The extent to which development:

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

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

~~*i iii. provides for pedestrian priority within the retail core, particularly in respect to the open air main street environment;*~~

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

~~15.1314.4.3.5 Civic Square~~

a. The extent to which development:

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

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

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

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

Our proposed Housing and Business Choice and Heritage Plan Changes (13 & 14)

Submitter Details

Submission Date: 01/05/2023

First name: Tracey **Last name:** Strack

Preferred method of contact Email

Postal address: 9 Helmores Lane

Suburb: Merivale

City: Christchurch

Country: New Zealand

Postcode: 8014

Email: strack.dn@gmail.com

Daytime Phone: 0211103632

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

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

Yes

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

Attached Documents

File

Submission on Proposed Plan Change 14 to the Christchurch District Plan

Submission on Proposed Plan Change 14 to the Christchurch District Plan

Submitters: Matthew and Tracey Strack

9 Helmores Lane
Christchurch 8014

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

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

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

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

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

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

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

We seek the following decision from the Council:

- That Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) be identified in the Christchurch District Plan as a Medium Density Residential zone and a Residential Character Overlay Area and be made subject to the rules that apply to Residential Character areas: or,
- If Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) are not included as a Residential Character Area, that the Area be zoned Medium Density Residential: and,
- That sunlight access be better protected by further amending the medium/high density southern boundary recession plane to 45° from 3m at the boundary: and,
- That neighbours along the southern boundaries of any proposed developments that involve non-compliances with height or access to sunlight rules *can* be notified of the required resource consents and to make submissions.
- Any further or other decisions that achieve the outcomes sought by this submission, or are required as a consequence of the relief we seek.

Signed: Matthew Strack

Tracey Strack

Dated: 1 May 2023

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 02/05/2023

First name: Sandra **Last name:** Caldwell

Preferred method of contact Email

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Suburb:

City:

Country: New Zealand

Postcode:

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Daytime Phone: 021880552

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

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

Note to person making submission:

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

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

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 20.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

My submission is that

Main Shopping Centre Accessibility

andnbsp;

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

andnbsp;

andnbsp;

Infrastructure

andnbsp;

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

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

andnbsp;

andnbsp;

School Safety

andnbsp;

Paparoa Street is home to the highly sort after Paparoa Street School and as a consequence saturates the parking during school days. High density apartments that have no off-street parking requirement (so they could park all day on the street) will add significant traffic congestion during the school terms and ***seriously impact on the safety of both children and parents.***

andnbsp;

andnbsp;

Parking

andnbsp;

Paparoa Street being a cul-de-sac is pressured at both ends for parking requirements. Paparoa Street is already difficult for traffic entering and exiting Papanui Road. Parking on both sides of the street makes traffic movement limited to one car travelling in either direction at one time due to the current width of the road. Changes in traffic habits since the earthquakes has already seen an unexpected burden placed on this area not originally designed for the current flow of traffic. Paparoa Street is extremely busy as parents drop off and pick up students adding high density apartments with. No off-street parking requirement will undoubtedly cause significant traffic and safety risks during school terms.

andnbsp;

andnbsp;

Social Impact

andnbsp;

High density apartment living with no access to outside space (e.g., lawns) does not replicate the family friendly urban environment for which the area was originally designed. With the desirability of the numerous schools in the area high density housing is not conducive to the type of family clientele seeking to make the area home. We have no need to replicate Hong Kong, Singapore and New York in this regard.

andnbsp;

andnbsp;

Papanui Heritage Designation (Plan Change 13)

andnbsp;

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

andnbsp;

andnbsp;

The Need for High Density Housing in Christchurch

andnbsp;

The rezoning of Paparoa Street and parts of Papanui is unnecessary as there are large tracts of land in Christchurch already zoned for high density living. Large areas already zoned are sitting undeveloped and are likely to take many years to develop and populate. High density housing should in the immediate future be solely to the areas in the cities four avenues to attract a vibrant population base back into the city to support the central cities vision.

andnbsp;

andnbsp;

Land Suitability

andnbsp;

The land **quality** in Paparoa Street is likely not suitable for high density building.andnbsp; If new two-story houses need 4 metre driven piles what would a 6-story apartment block require?andnbsp;

andnbsp;

andnbsp;

Papanui Designation “Large Town Centre”

andnbsp;

Papanui can hardly be considered a “Large Town Centre” and should now be designated as a “Suburb Centre”.andnbsp; The face of this area has changed dramatically as a number of highly sort after services have left the area.andnbsp;

andnbsp;

andnbsp;

Apartment Blocks Placement

andnbsp;

Apartment blocks should be in clusters where essential services can be designed and provided accordingly e.g., green space, cafes and restaurants, supermarkets and transport options.

Walking options to employment within the commercial fabric of inner city would relieve pressure on transportation needs and the provision there of.

andnbsp;

andnbsp;

Other Options to Consider

andnbsp;

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

andnbsp;

andnbsp;

Decisions Sought

andnbsp;

Considering all of the above especially the safety issues and children’s wellbeing with regards to the social impact we propose that the boundary line for high density residential zoning be reconsidered for Paparoa Street in order to retain the “Garden City” and “Heritage” nature of the area. Therefore, the area needs to be zoned purely residential suburban to protect the **wellbeing and safety** of the family community.

andnbsp;

andnbsp;

Attached Documents

File

File

No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 01/05/2023

First name: Cameron **Last name:** Matthews

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Postcode:

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Daytime Phone:

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

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 21.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

Refer to attached submission

Briefly;

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

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

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

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

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

- Addington
- Lyttelton
- Sumner
- Sydenham South
- Wigram

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

- Change side/rear height-in-relation-to-boundary (HIRTB) rules such that they are consistent with MDRS for MRZ
- Waive HIRTB from side and rear boundaries for parts of the building at the front of the site which are setback by more than 5m, or preferably 3m
- Remove Building Separation requirement
- Increase maximum permitted height to 18-21m, at least for front of site
- Increase number of permitted unit to at least 6 within HRZ

Amend MRZ built form standards:

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

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

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

My submission is that

Refer to attached submission

Original Submitter:

Original Point:

Points: 21.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

Refer to attached submission

Briefly;

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

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

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

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

My submission is that

Refer to attached submission

Original Submitter:

Original Point:

Points: 21.3

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

Refer to attached submission.

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

My submission is that

Refer to attached submission

Original Submitter:

Original Point:

Points: 21.2

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

Refer to attached submission, in particular:

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

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

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

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

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

- Addington
- Lyttelton
- Sumner
- Sydenham South
- Wigram

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

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

My submission is that

Refer to attached submission

Original Submitter:

Original Point:

Points: 21.3

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

My submission is that

Refer to attached submission.

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

Attached Documents

File
Submission on Plan Change 14 CM

Submission on Plan Change 14

Cameron Matthews

Executive Summary

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

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

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

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

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About me

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

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

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

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

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

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

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

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

Matters which aren't Qualifying

Sunlight Access

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

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

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

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

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

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

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

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

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

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

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

⁵ Proposed Housing and Business Choice Plan Change (PC14) Section 32 report, Part 2 Qualifying Matters, Part 3, 6.30

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

the month of the winter solstice, by around 7 hours, 6% more than Auckland's 110 June mean monthly sunshine hours. This extends to 7% more sunlight hours in Christchurch compared to Auckland over the full year. If sunlight-parity between Christchurch and Auckland is the goal, we would probably already achieve it without the proposed QM.

9. CCC claim that sun access on the second floor is *"reduced from little to none"* and that this *"forces outdoor living on the top floor"*. Aside from nothing being wrong with outdoor living on the top floor, and that sunlight access at mid-day is not the only or even necessarily the primary determinant of where best to provide for outdoor living in the middle of winter, and it is untrue that sunlight access on the second floor is *"reduced from little to none"*. All that CCC's illustration⁷ shows, is that:
 - for a few weeks around the winter solstice,
 - if you're in a house with lower-stud-heights,
 - if the day is not cloudy,
 - and neither you nor your northern neighbour have trees,
 - and your site is at the same level as the one directly north of yours,
 - then at around mid-day...

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

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

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

appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types". Little or no consideration for these other amenity values has been given.

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

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

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

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

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

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

Special Character Areas

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

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

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

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

Hackthorne Road

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

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

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

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

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

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

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

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

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

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

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

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

Beckenham

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

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

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

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

Roker and Penrith

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

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

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

Airport Noise Contour

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

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

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

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

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

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

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

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

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

Riccarton Bush Interface

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

Overestimated impact of intensification

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

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

¹⁵ Operative Christchurch District Plan Appendix 14.16.4

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

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

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

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

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

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

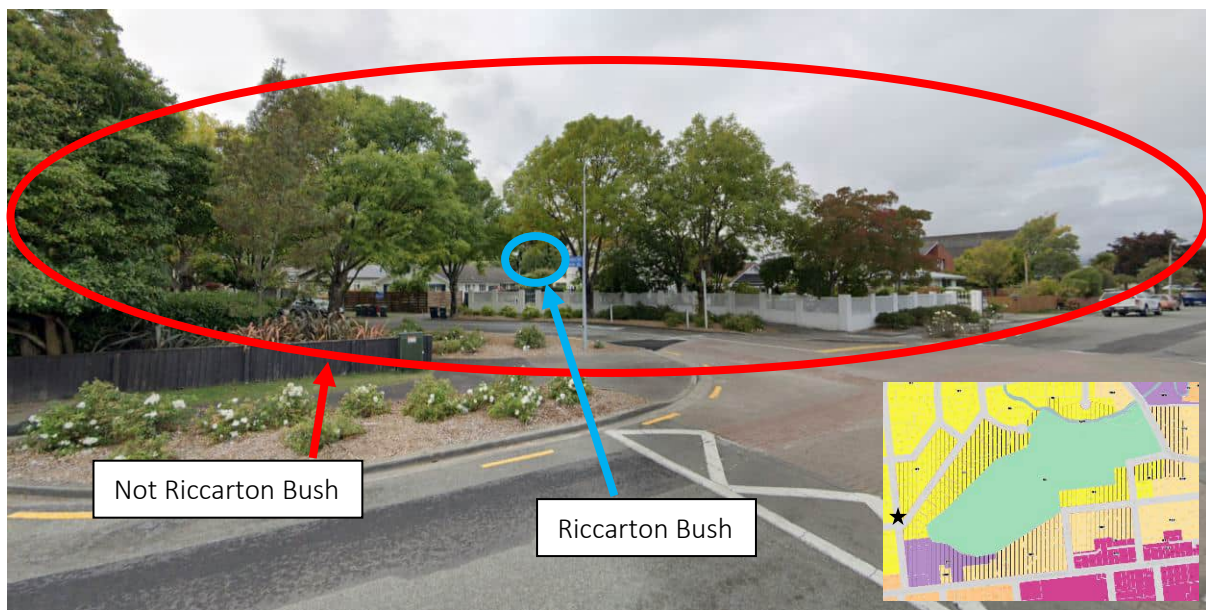


Figure 1 “Distinctive” view toward Riccarton Bush from the intersection of Puriri Street and Totara Street.

Inconsistent with NPS-UD

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

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

²⁰ Proposed Housing and Business Choice Plan Change (PC14) Section 32 report, Part 2 Appendix 43 Pūtaringamotu Riccarton Bush Heritage Landscape Review 2022 5.3

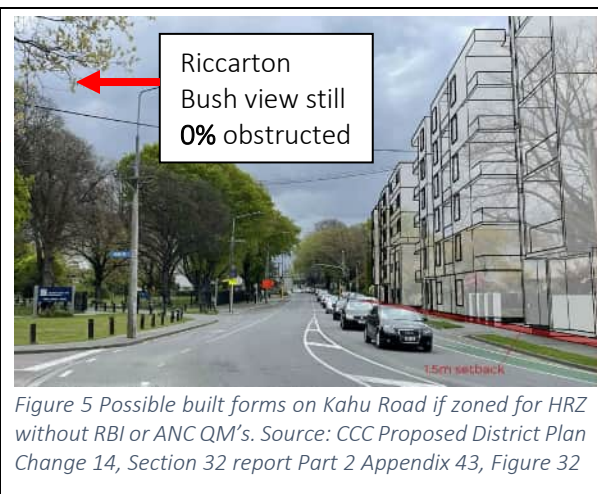
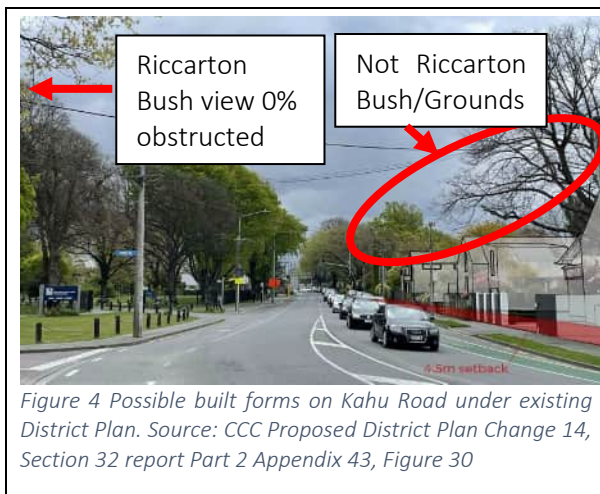
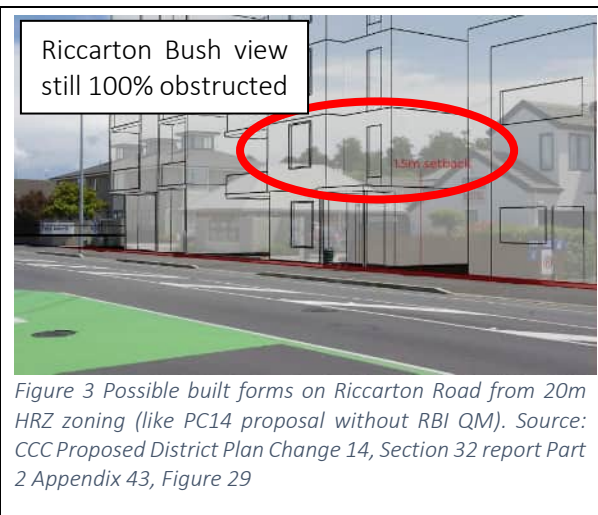
²¹ Proposed Housing and Business Choice Plan Change (PC14) Section 32 report, Part 2 – Qualifying Matters, Part 2, 6.11.12 Table 19

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

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

Ineffective at managing claimed ‘specific features’

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



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

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

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

High negative impact on housing

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

What isn't evident from this impact assessment is the **desirability of this location.** Riccarton's commercial area is a Large Town Centre – Key Activity Centre with huge commercial and retail activity. Riccarton Road (which the proposed QM area adjoins) plays host to **3 of our 5 most frequent Core public transport services** (#3, #5, and Orbiter) and is poised to upgrade to a Bus Rapid Transit (BRT) or Light Rail Transit (LRT) corridor in the medium term, denoted in the proposed plan by the City Spine Transport Corridor. There is a **Major Cycle Route** (Uni-Cycle MCR) running through Riccarton Grounds, connecting the nearby **University of Canterbury** with Riccarton, Hagley Park, and the central city. According to The Property Group's *New Medium Density Residential Standards (MDRS) - Assessment of Housing Enabled in Christchurch City 2022*²³ **much of the feasible development enabled under PC14 is concentrated in Riccarton Central**, due to the significant accessibility values of the area.

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

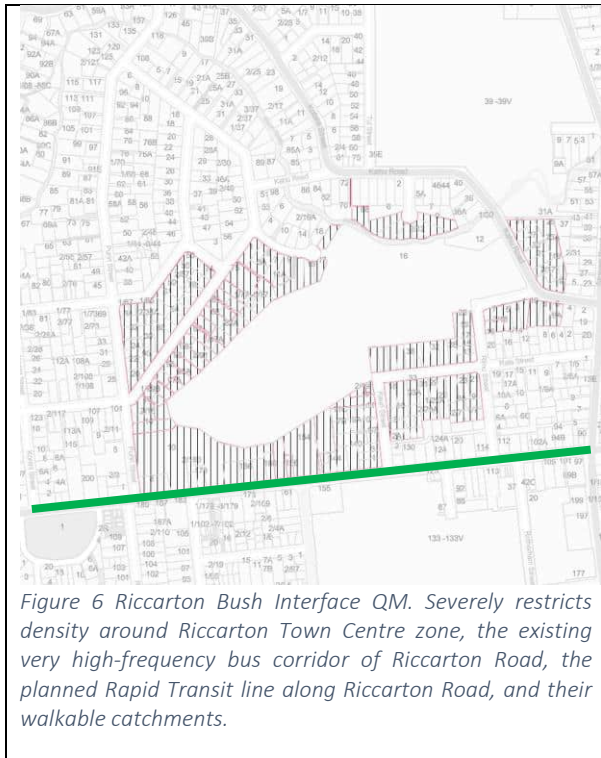


Figure 6 Riccarton Bush Interface QM. Severely restricts density around Riccarton Town Centre zone, the existing very high-frequency bus corridor of Riccarton Road, the planned Rapid Transit line along Riccarton Road, and their walkable catchments.

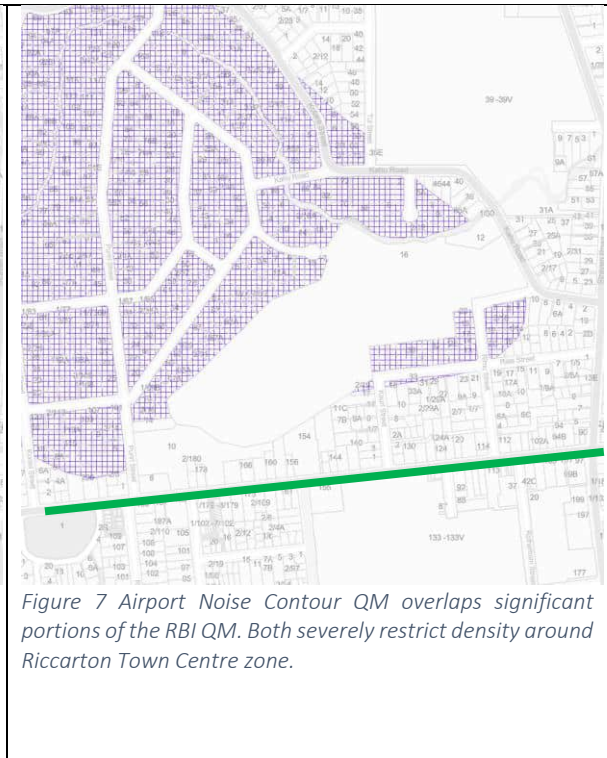


Figure 7 Airport Noise Contour QM overlaps significant portions of the RBI QM. Both severely restrict density around Riccarton Town Centre zone.

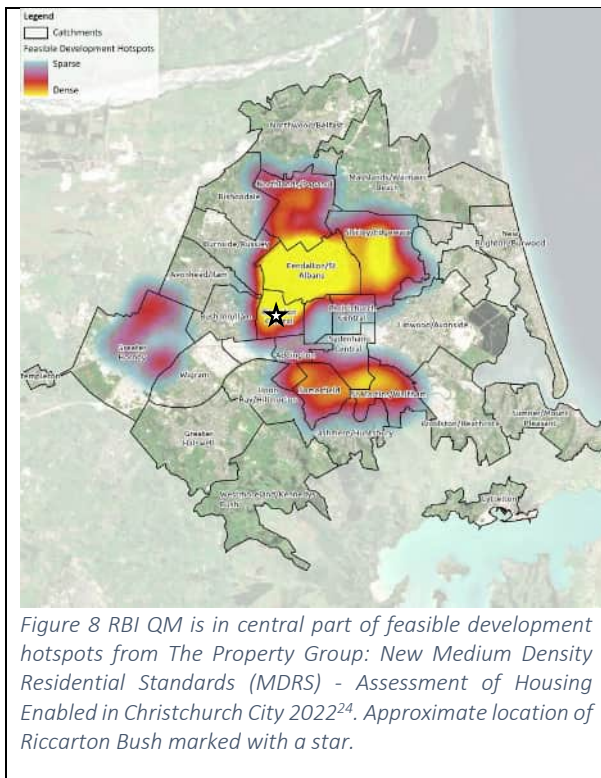


Figure 8 RBI QM is in central part of feasible development hotspots from The Property Group: New Medium Density Residential Standards (MDRS) - Assessment of Housing Enabled in Christchurch City 2022²⁴. Approximate location of Riccarton Bush marked with a star.

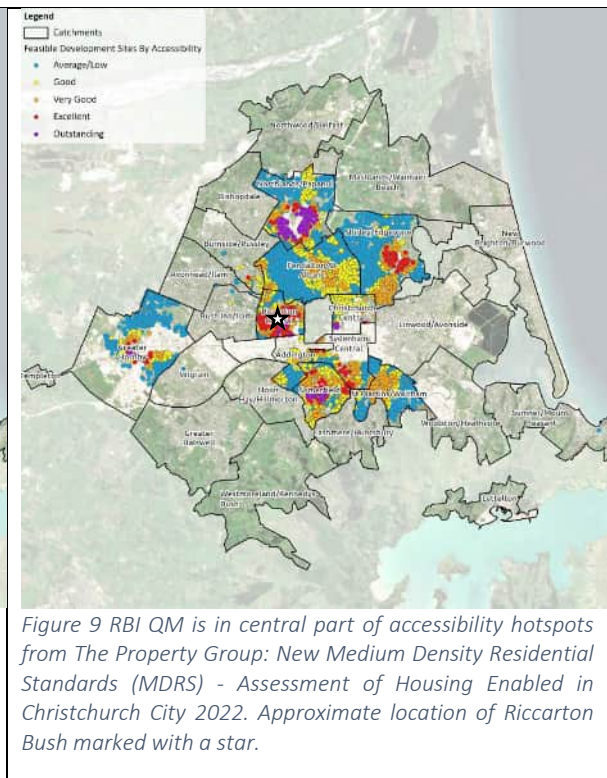
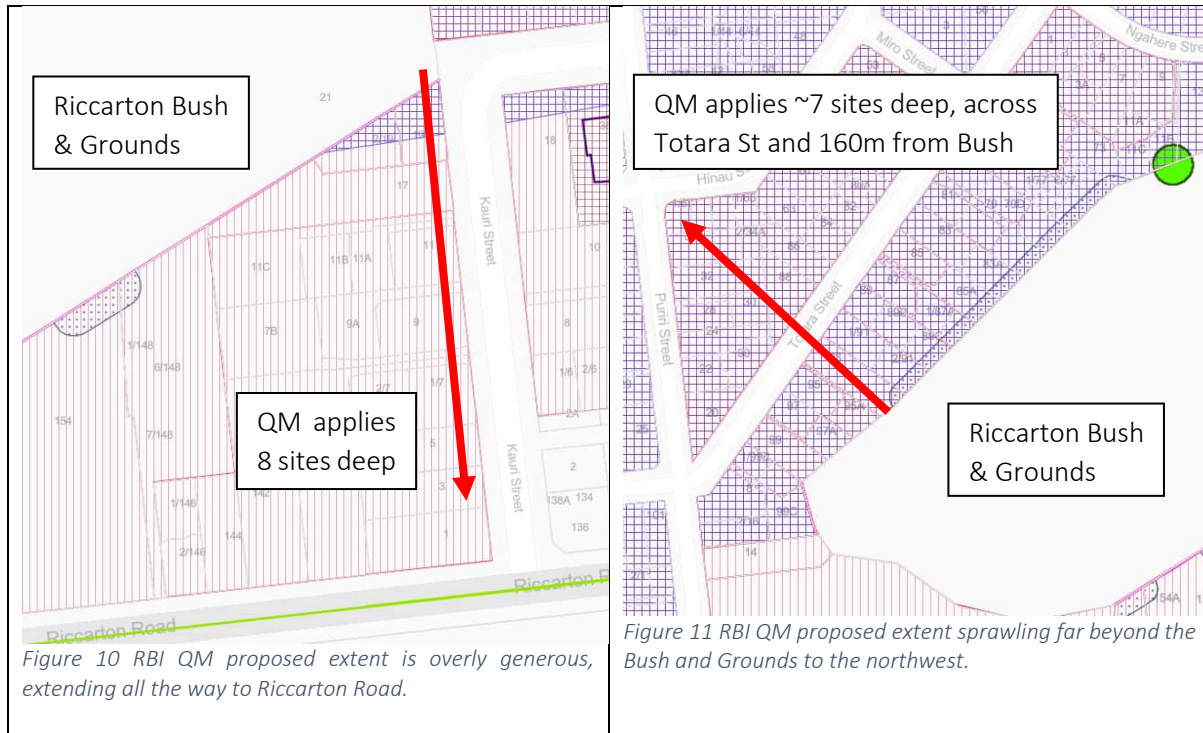


Figure 9 RBI QM is in central part of accessibility hotspots from The Property Group: New Medium Density Residential Standards (MDRS) - Assessment of Housing Enabled in Christchurch City 2022. Approximate location of Riccarton Bush marked with a star.

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

Overzealous spatial extent

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



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

Low-density zones not meeting regulations

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

MDRS arguments

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

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

NPS-UD arguments

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

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

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

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

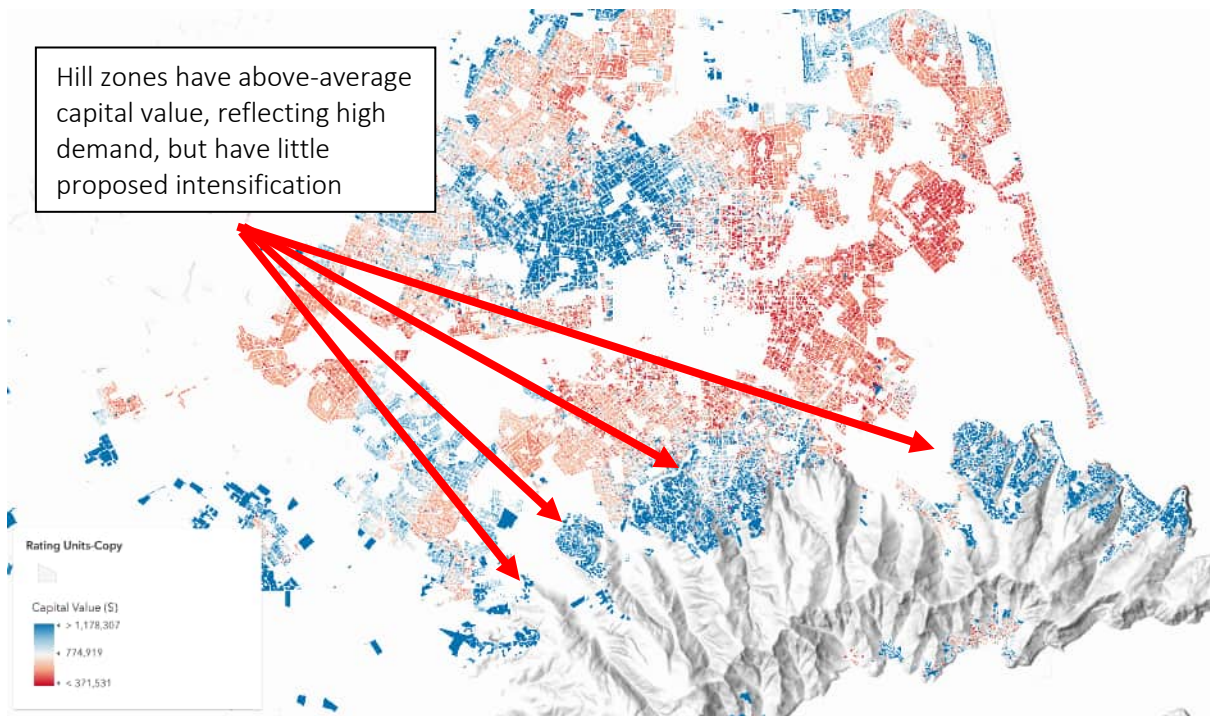


Figure 12 Average capital valuation for residential land across Christchurch, with blue showing higher values. Data mapped from CanterburyMaps Open Data portal <https://opendata.canterburymaps.govt.nz>

Errors in application of Qualifying Matters

Low Public Transport Accessibility Area

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

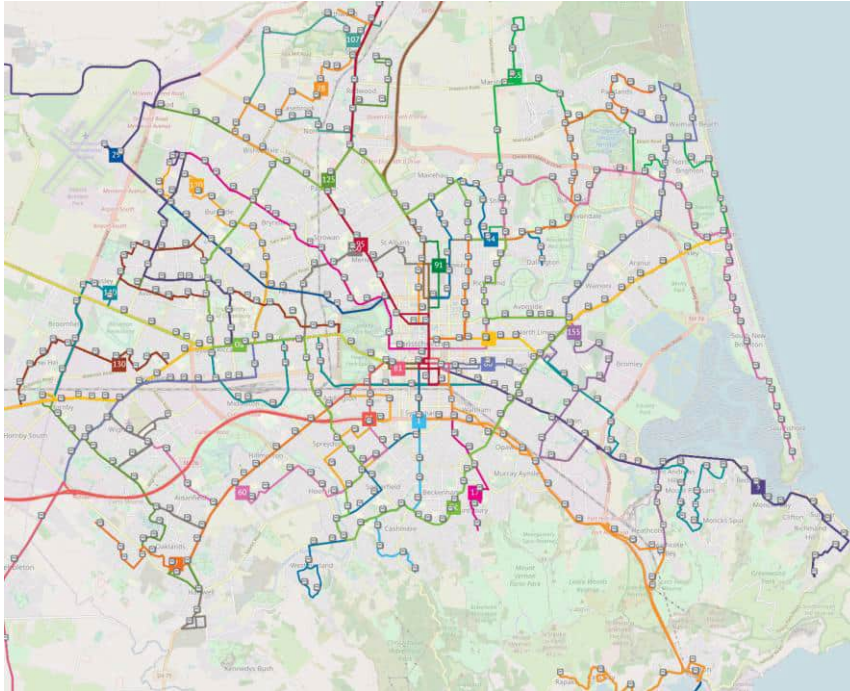


Figure 13 Existing Christchurch bus network of the contiguous urban area, courtesy <https://go.metroinfo.co.nz/mtbp/en-gb/arrivals/content/routes>

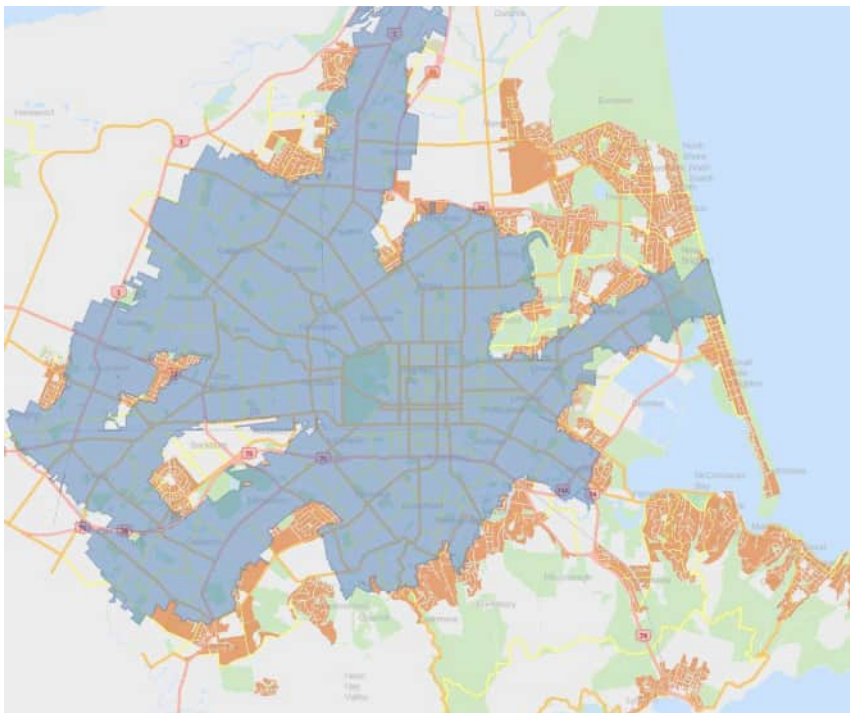


Figure 14 Proposed "Low Public Transport Accessibility" Qualifying Matter spatial extent, shown in brown/orange.

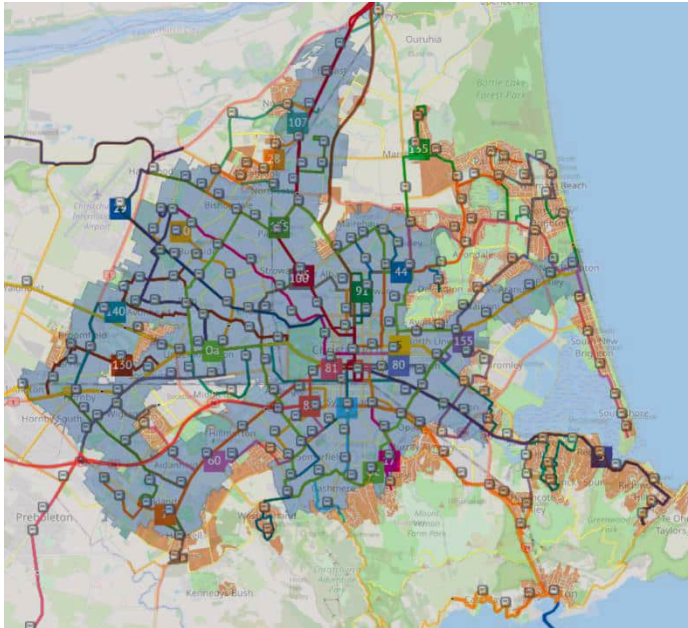


Figure 15 Approximate overlay of LPTA QM and actual PT network showing large parts of the proposed QM extent, despite being on the city periphery, are already served by – sometimes excellent – PT services

Affected communities served by Core Bus Routes

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

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

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

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

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

Affected communities served by Future Core Routes

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

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

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

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

Affected communities served by City Connector or other services

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

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

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

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

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

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

Inconsistent application unrelated to PT provision

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

For example:

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

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

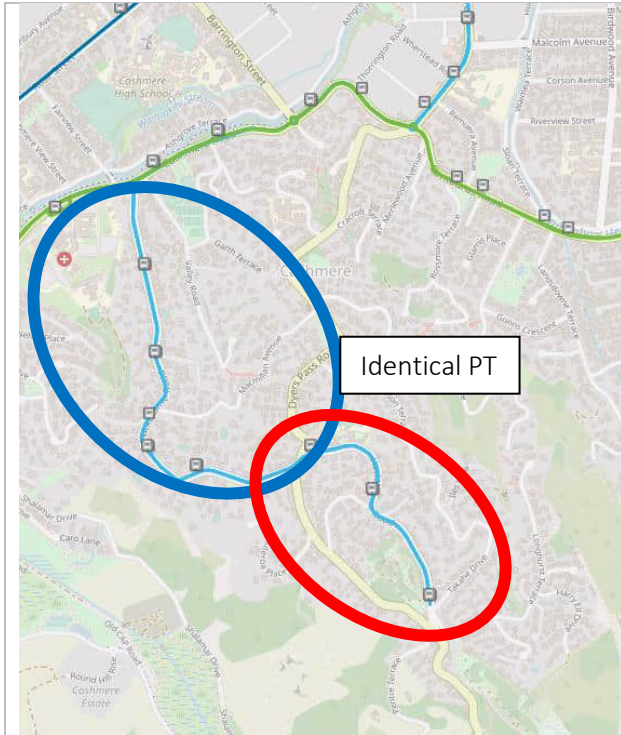


Figure 16 Route #1 along Hackthorne Rd, serves the area at the intersection with Dyers Pass Road identically to the area at Sign of the Takahe

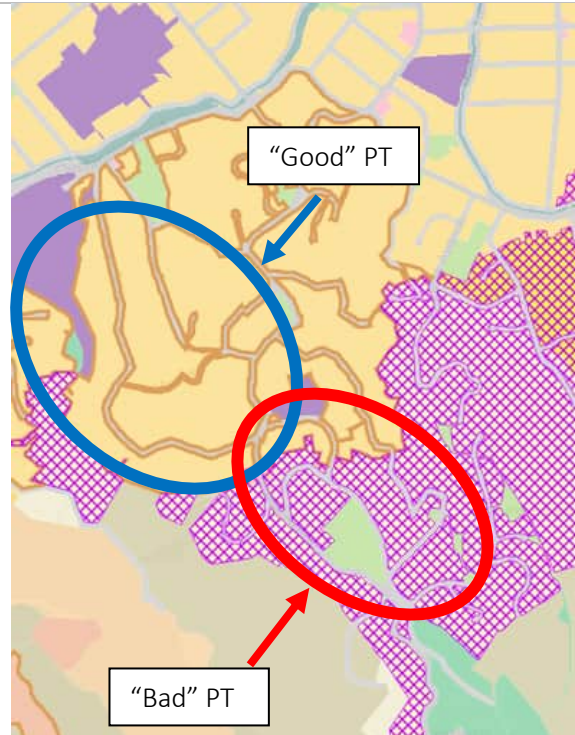


Figure 17 Low Public Transport Accessibility areas (purple hatching) highlighted in red, vs. identical PT provision in blue area. Special/Residential Character Area Qualifying Matter (SCA QM) also proposed within blue zone, preventing densification here too.

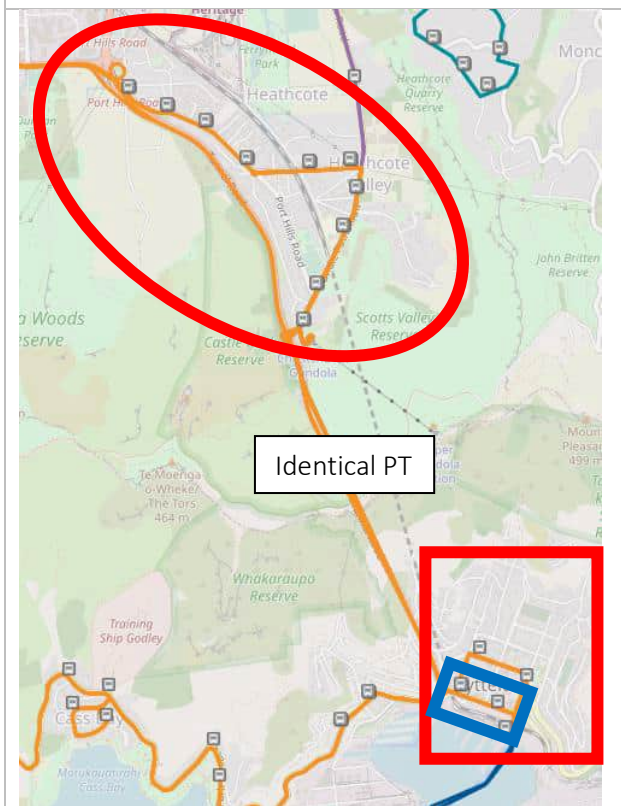


Figure 18 Route #28 serves Heathcote Valley and Winchester Street identically to Norwich Quay

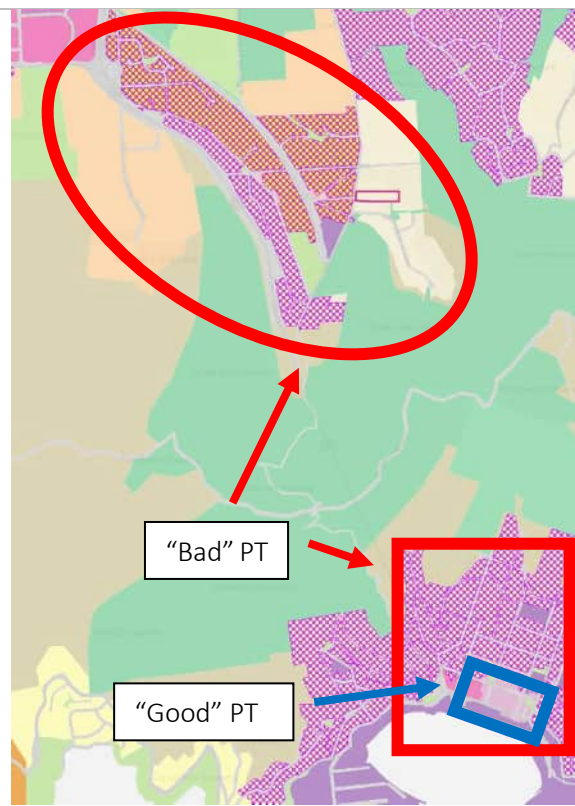


Figure 19 Low Public Transport Accessibility areas (purple hatching) highlighted in red, vs. identical PT provision in blue area.

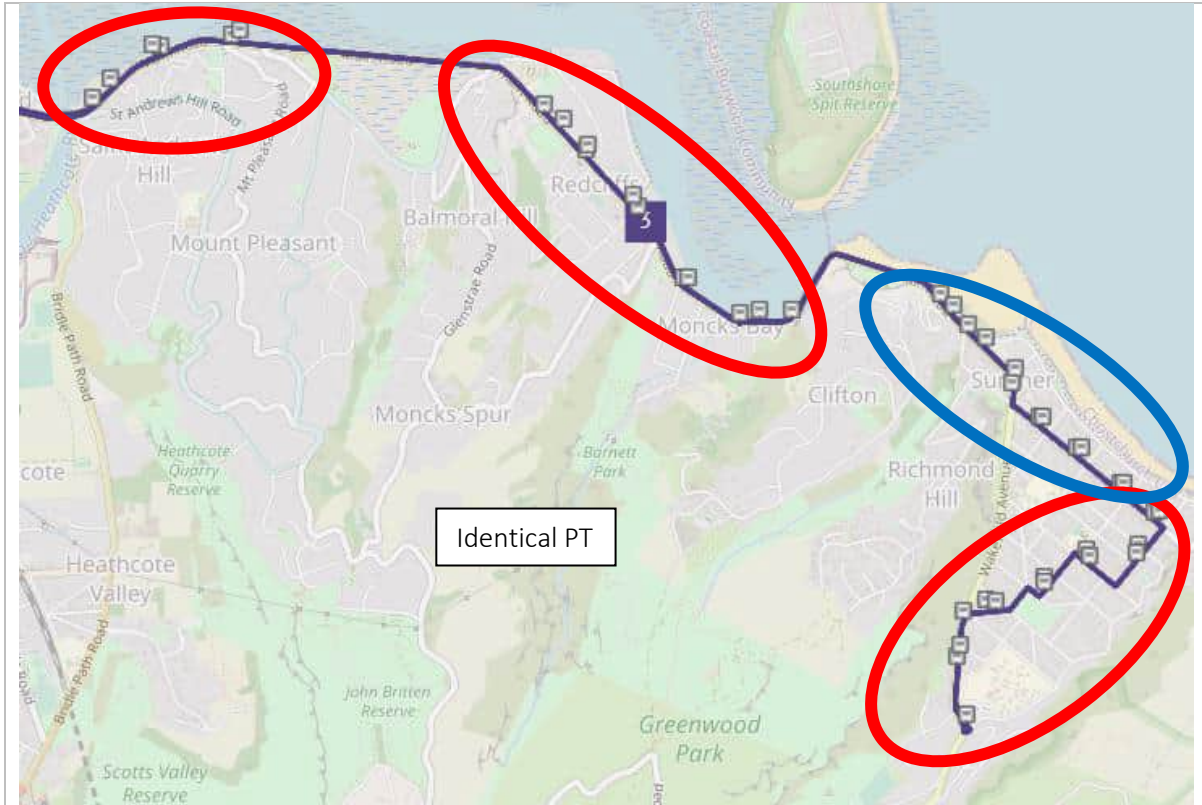


Figure 20 Route #3 equally serves Sumner village and the main strip along Nayland Street identically to Sumner's back-blocks, Mt Pleasant, Redcliffs, and Monck's Bay

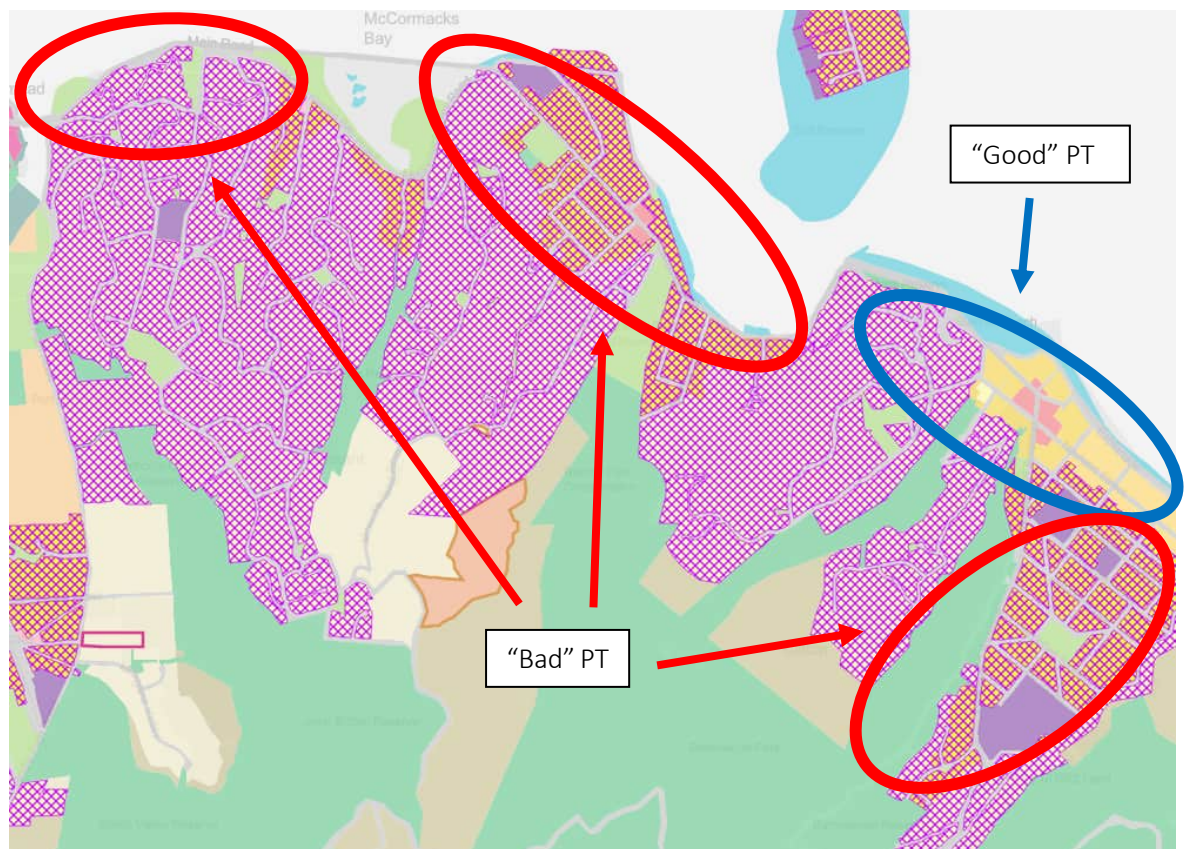


Figure 21 Low Public Transport Accessibility areas (purple hatching) highlighted in red, vs. identical PT provision in blue area.

Inconsistent application unrelated to accessibility

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

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

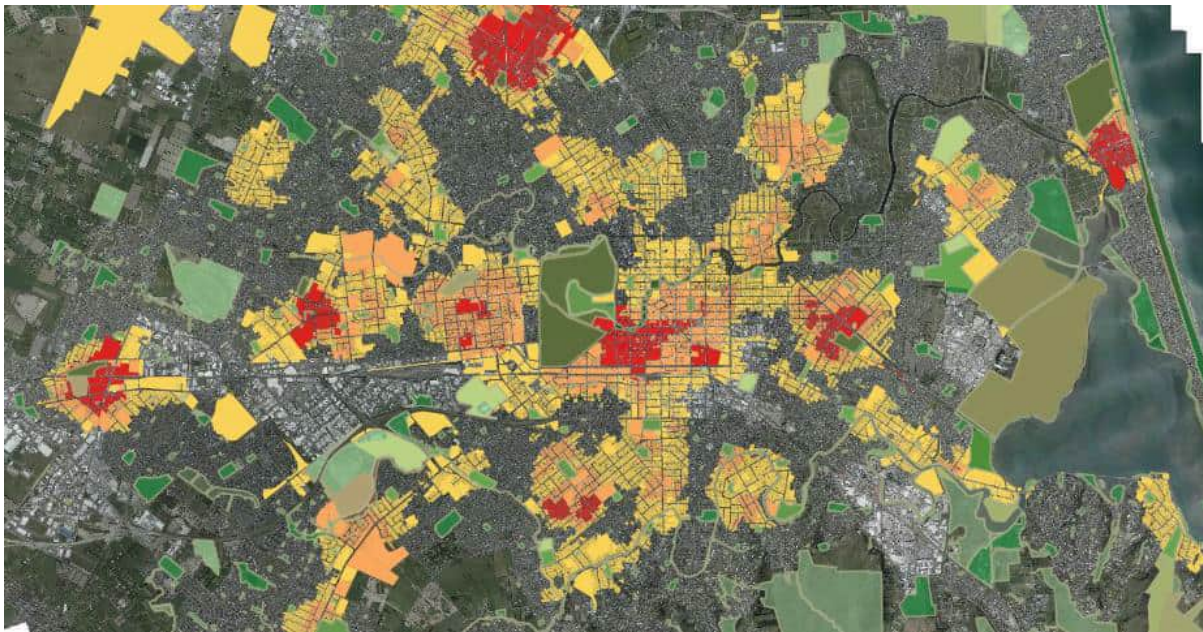


Figure 22 ‘Density-enablement’ model from CCC’s Section 32 report

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

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

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

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

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

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

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

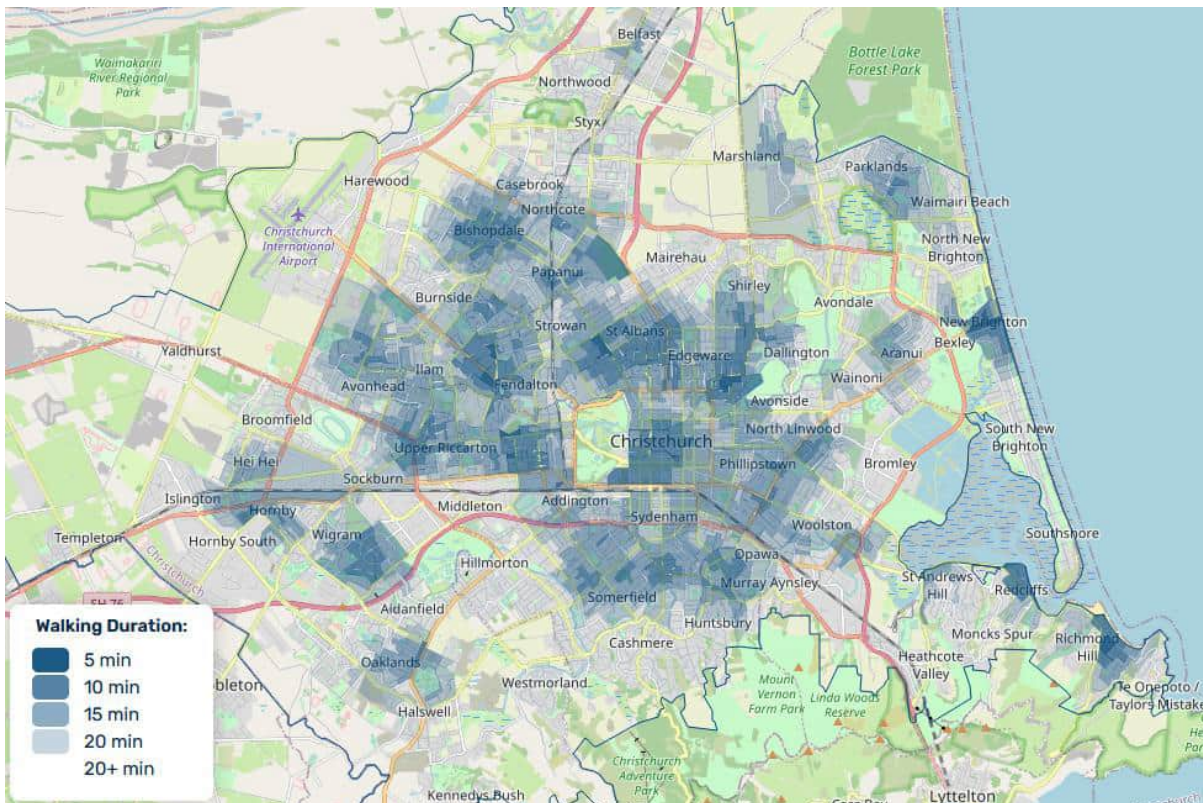


Figure 23 Walking accessibility to everyday amenities, as mapped by University of Canterbury researchers and Urban Intelligence. Image courtesy: <https://research.uintel.co.nz/x-minute-city/>

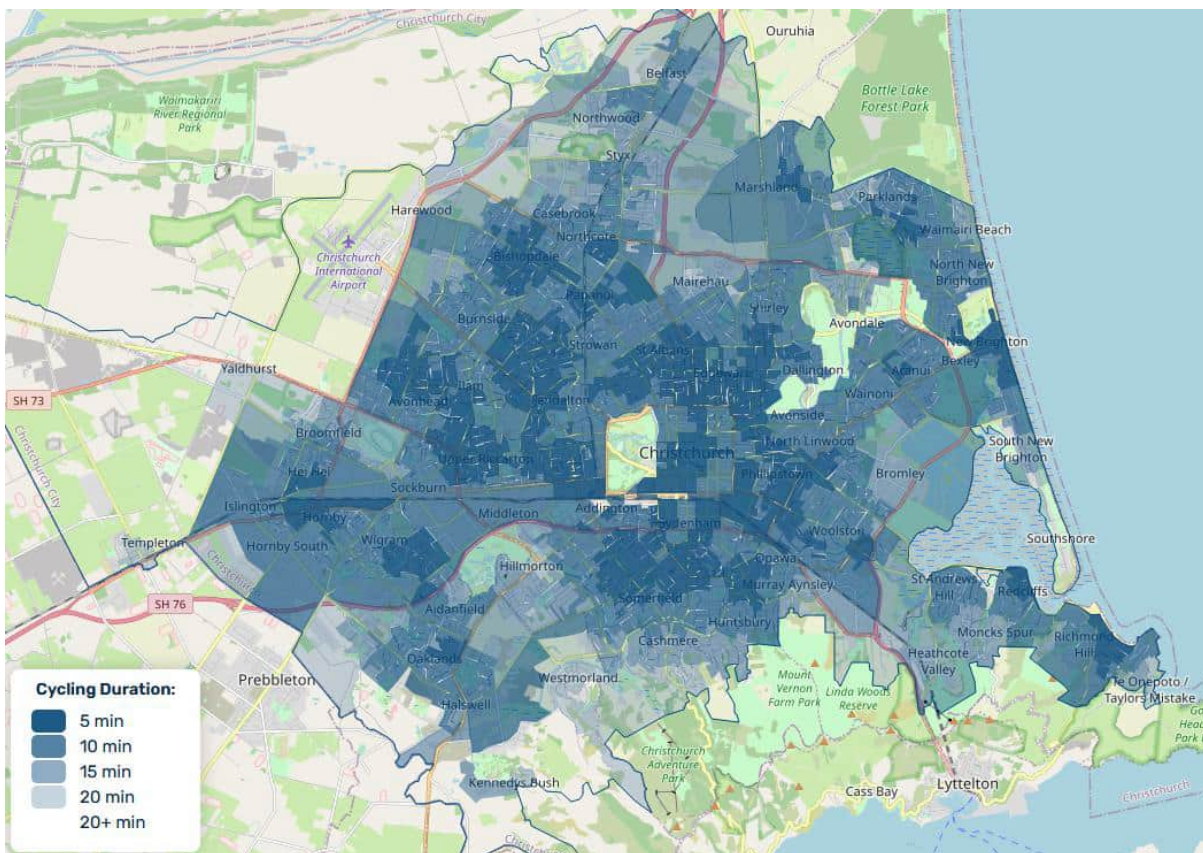


Figure 24 Cycling accessibility to everyday amenities, as mapped by University of Canterbury researchers and Urban Intelligence. Image courtesy: <https://research.uintel.co.nz/x-minute-city/>

High negative impact on housing

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

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

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

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

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

Planned density insufficient

Compromised enablement of high density in HRZ

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

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

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

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

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

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

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

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

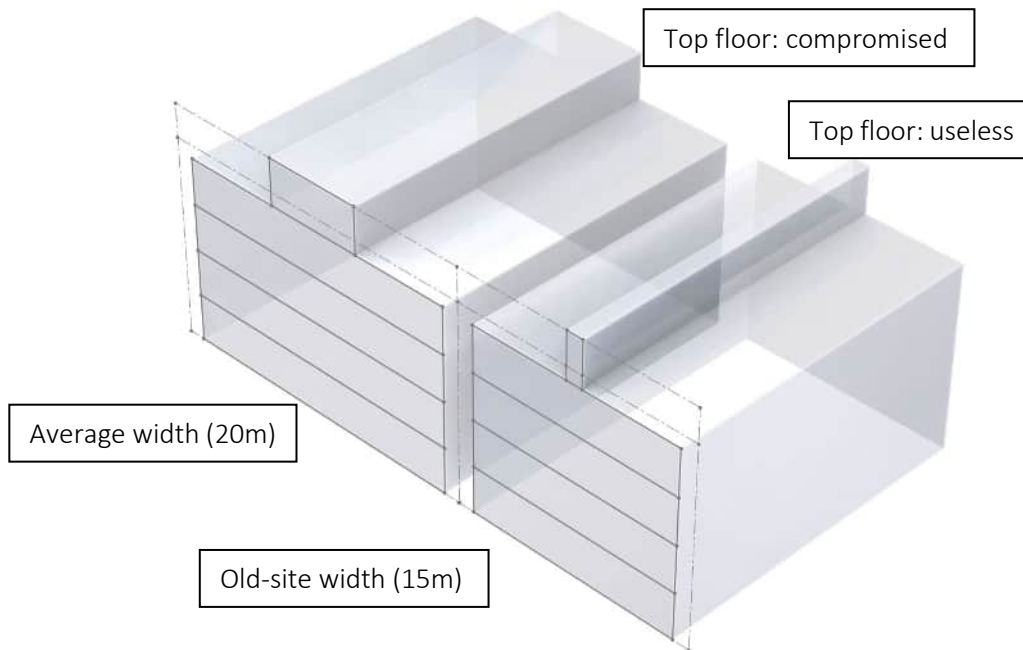


Figure 26 Front-of-site maximal build envelopes for HRZ to 14m height. LEFT: average, 20m wide site and RIGHT: typical pre-1970 site (15m width). Height limit and setback above 12m only allows for ~2.8m floor separations on average, and a (sometimes very) compromised 5th floor.

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

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

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

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

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

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

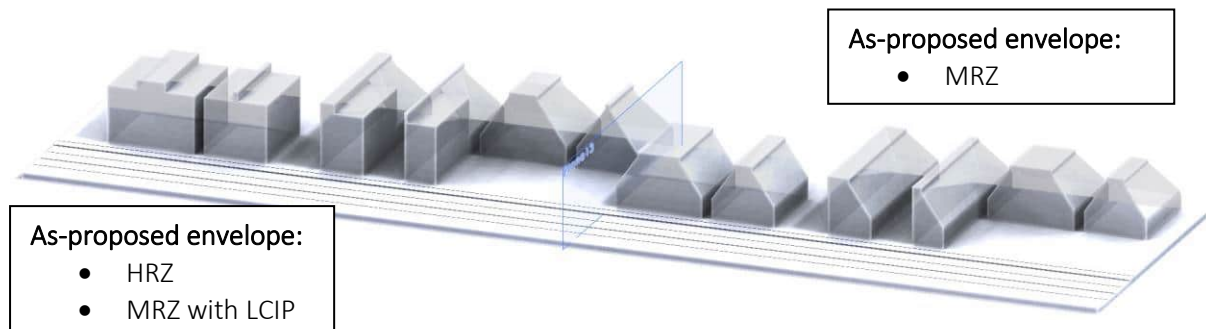


Figure 27 Theoretical build envelopes with 50% site coverage for HRZ (left) and MRZ (right), with alternating site widths of 20m and 15m. Site depth is 40m, creating 600-800m site areas (skewing larger than median parcel size). Road reserve width is 20m. Recession planes are all 3m+55° (the average across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

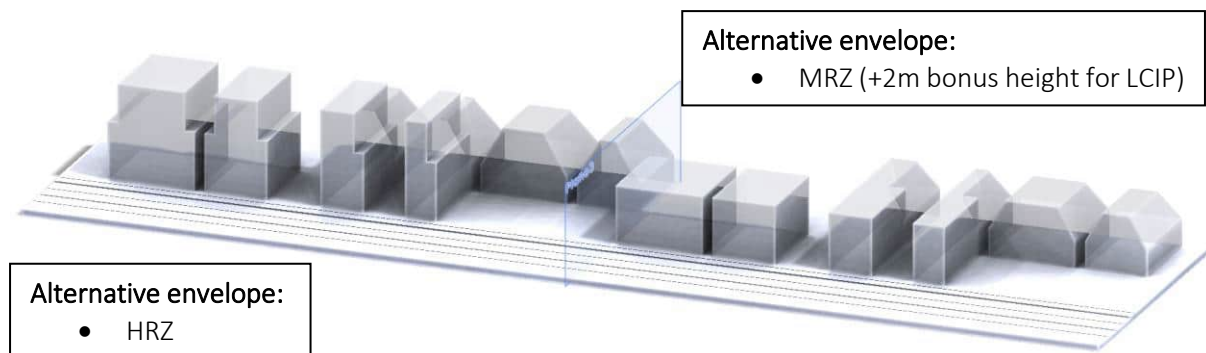


Figure 28 Alternative build envelopes with 50% site coverage for HRZ (left) and MRZ (right). Side/rear HIRTB: 4m+60°. Front 20m of HRZ sites get meaningful density bonus, with increased height limit of 20m, and exemption from the 4m+60° plane, with side/rear setbacks of 3m above 12m height. Front 20m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

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

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

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

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

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

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

Addington

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

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

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

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

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

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

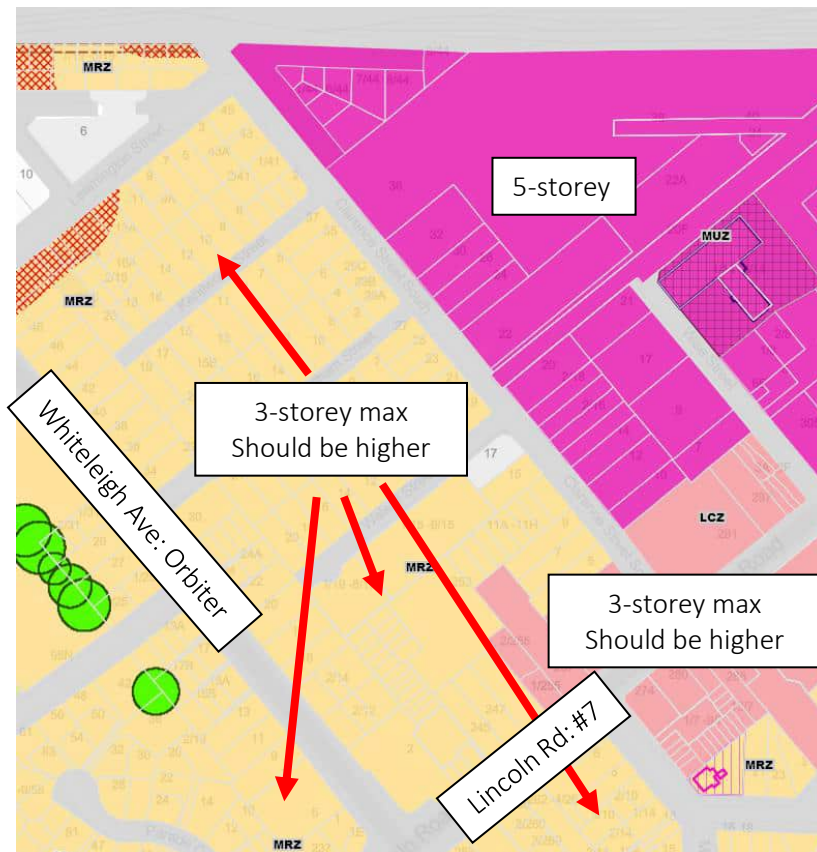


Figure 29 Addington proposed zoning exhibits only 3-storey densities in parts of commercial zone fronting Lincoln Road. Not only should this be higher, but a walkable catchment of housing should be too. The sharp difference in building densities in the adjacent MUZ is anomalous.

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

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

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

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

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

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

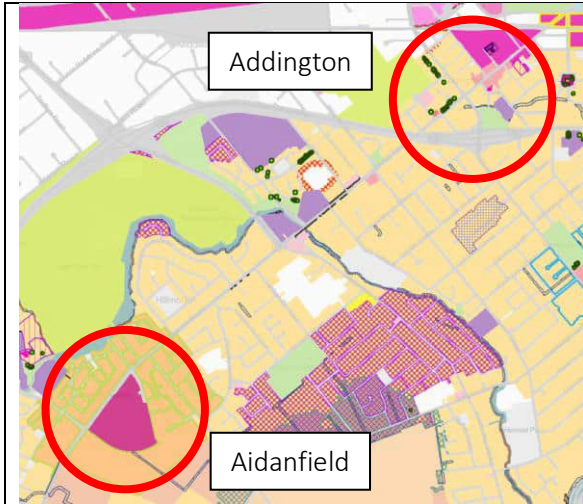


Figure 30 Zoning and positions of Addington vs Aidanfield

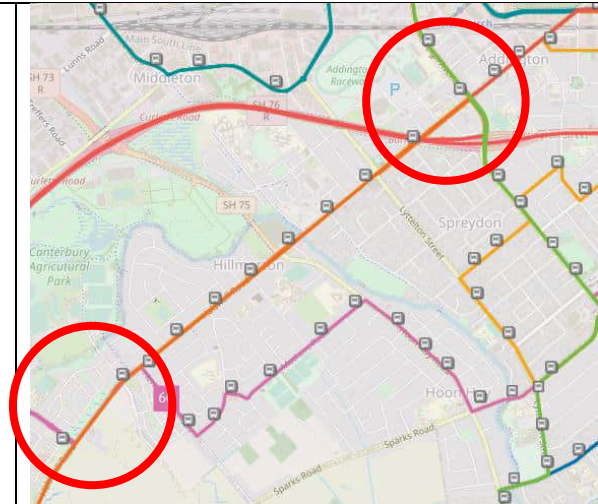


Figure 31 Public transport provision for Addington vs Aidanfield.



Lincoln/Halswell Rd
 ~2-3km from CC
 2 Core Bus Routes
 3-4 storeys

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



Lincoln/Halswell Rd
 ~6-7km from CC
 1 Core Bus Route
 4-10 storeys

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

Lyttelton

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

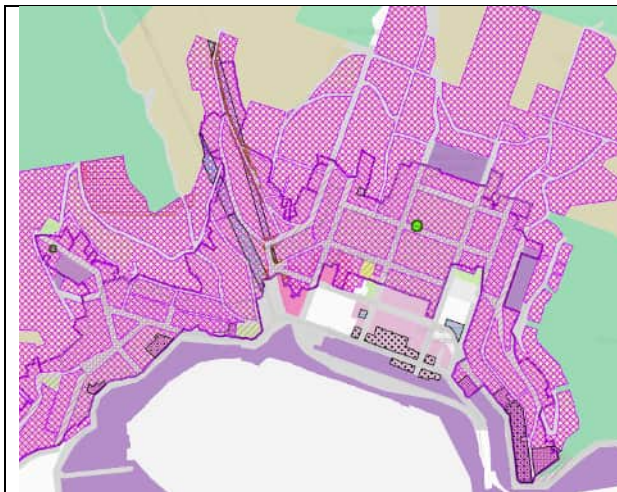


Figure 34 QM constraints in Lyttelton are dominated by Low PT Accessibility QM and “character” protections, preventing commensurate up-zoning of sites adjacent to and in walkable catchment of the local centre.

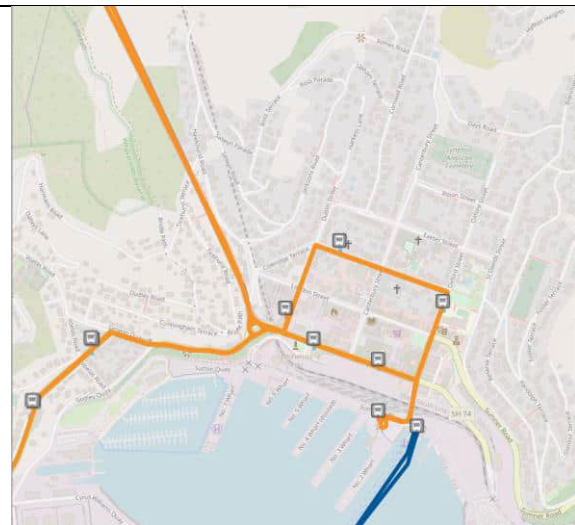


Figure 35 PT access within Lyttelton is quite good, being served by future-core #28 and the somewhat surprisingly frequent Diamond Harbour Ferry.

Sumner

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

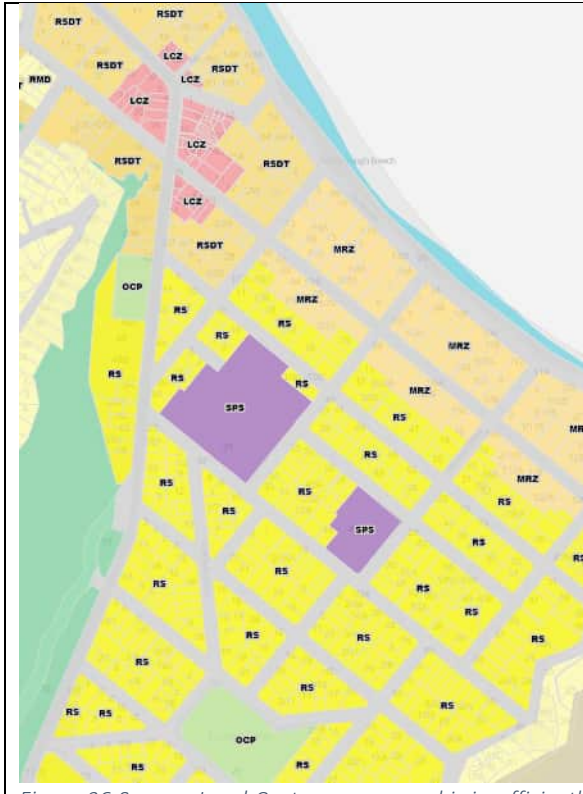


Figure 36 Summer Local Centre as proposed is insufficiently zoned and has insufficient up-zoning of residential sites in walkable catchment. Sites further from the coast are zoned to low densities.

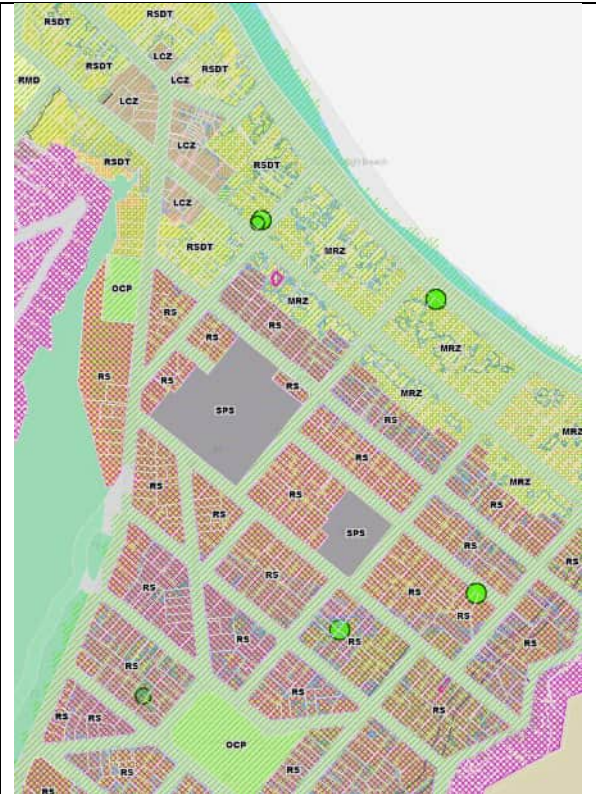


Figure 37 Sites further from the coast are at reduced risk of coastal hazards, denoted by their coastal hazard risk priority (medium, high, etc).



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

Sydenham South

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

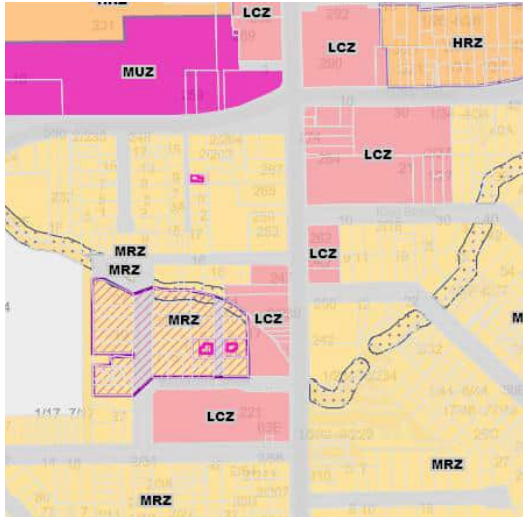


Figure 39 Sydenham South Local Centre is insufficiently zoned and has insufficient up-zoning of sites in walkable catchment.

Wigram

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



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

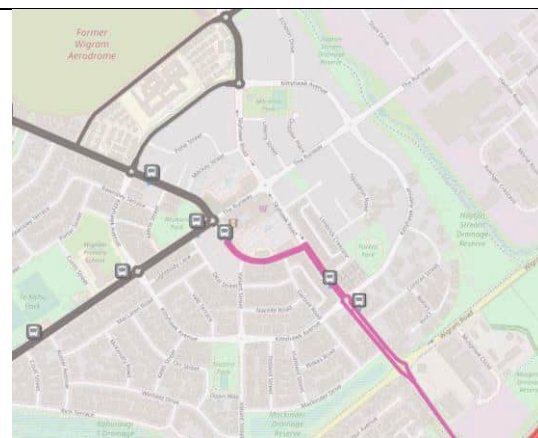


Figure 41 Existing public transport provision in Wigram shows decent connections currently exist.

Inappropriate and subjective strategy objectives

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

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

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

And:

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

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

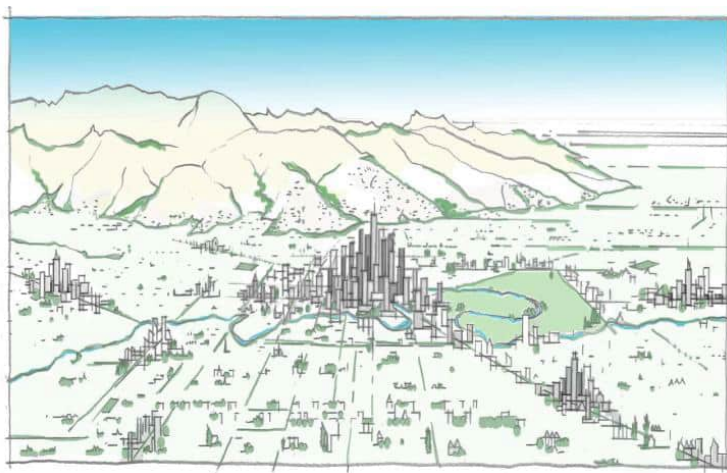


Figure 42 A CCC illustration, with a future-vision for a view of the city which will be available to nearly none of its residents. Source: <https://www.ccc.govt.nz/assets/Documents/Consultation/2023/Webinars/District-Plan-Changes/PC14-Public-Webinar-16-February-2023.pdf>

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

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

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

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

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

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

Lack of focus on Public and Active Transport

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

More housing near Core public transport routes

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



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

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

More housing near Major Cycle Routes

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

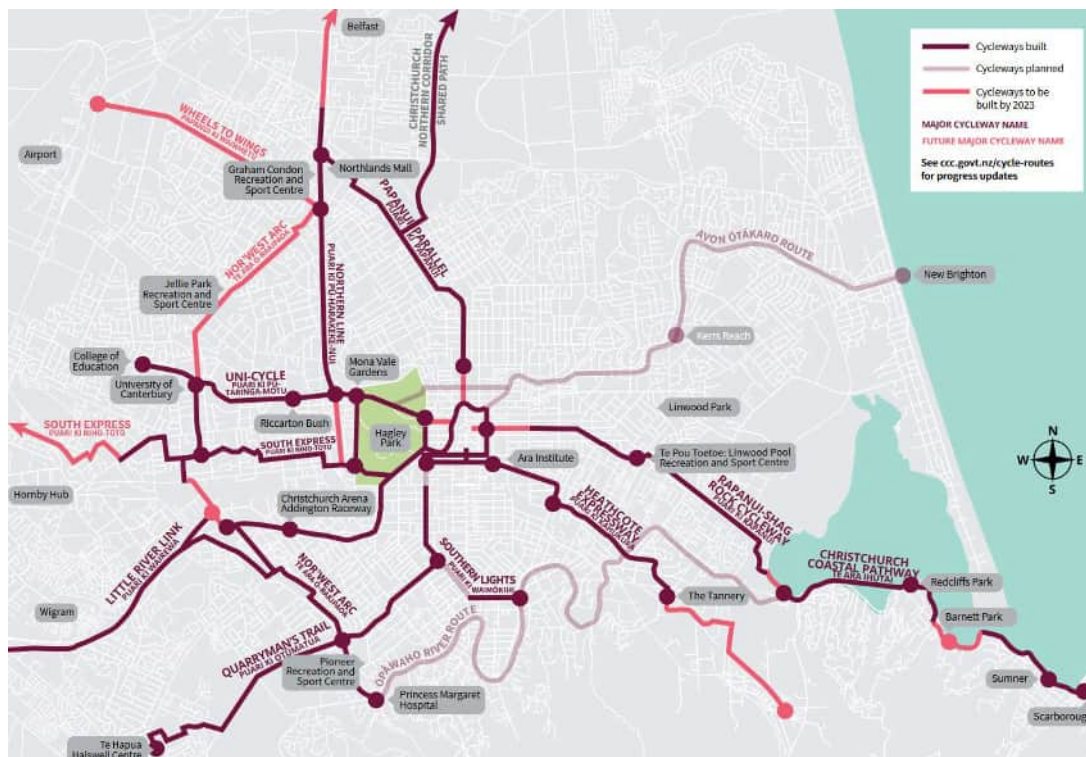


Figure 44 Christchurch Major Cycle Route network. Source: Christchurch Bike Easy Guide and Map, CCC

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

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

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

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

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

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

Housing near (potential) rail stations

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

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

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

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

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

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 01/05/2023

First name: Philip **Last name:** Rance

Preferred method of contact Email

Postal address: 63 Watford Street

Suburb: Strowan

City: Christchurch

Country: New Zealand

Postcode: 8052

Email: pwrance@gmail.com

Daytime Phone: 0211907240

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

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

Note to person making submission:

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

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

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 22.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

My submission is that

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

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

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

Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 01/05/2023

First name: Murray **Last name:** Walsh

Preferred method of contact Email

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City: Christchurch

Country: New Zealand

Postcode: 8014

Email: murray@coffeepartners.nz

Daytime Phone: 0274755051

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

I am
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.

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

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

Additional requirements for hearing:

Attached Documents

File

PC14 Helmores Lane - proposed RCOverlay rules - Novo

PC14 – RESIDENTIAL CHARACTER OVERLAY RULES (PROPOSED)

CCC Summary of Proposed Changes

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

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

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

Proposed Rules (Medium Density Residential Zone)

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

Restricted Discretionary	<p>Within a Character Area Overlay:</p> <p>a. The demolition or removal of a building greater than 30m² on the site, relocation of a building onto the site, erection of new buildings and alterations or additions to existing buildings, accessory buildings, fences and walls associated with that development.</p> <p>b. This rule does not apply:</p> <p>i. where 14.5.3.1.2 C1 applies.</p> <p>ii. to fences that meet the applicable built form standard 14.5.3.2.12 for that Character Area;</p> <p>iii. to accessory buildings that are less than 30m² and located to the rear of the main residential unit on the site and are less than 5 metres in height; iv. to fences that are located on a side or rear boundary of the site, except where that boundary is adjacent to a public space.</p> <p>c. Activities that do not meet Built Form standard 14.5.3.2.6. d. Any application arising from this rule shall not be limited or publicly notified.</p>	
	Building height controls (dependent on the area, but the current Character Areas have 7m and 5.5 height limits proposed)	In most places, 11 metres
	<p>Character Areas have a range of other special limits on built form, dependent on the values of that particular Character Area, including:</p> <ul style="list-style-type: none"> - the width of building frontages - landscaping - setbacks (larger than typical) - building coverage - outdoor living space requirements - minimum glazing facing the street - fencing - garaging and car ports - building separation <p>Generally the built form requirements are stricter than the underlying zoning would otherwise allow.</p>	

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

Proposed Subdivision Rules

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

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 01/05/2023

First name: Deborah **Last name:** BROWN

Preferred method of contact Email

Postal address: 15 Cashmere View Street

Suburb: Somerfield

City: Christchurch

Country: New Zealand

Postcode: 8024

Email: simonb.debb@gmail.com

Daytime Phone: 0274411984

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

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

Note to person making submission:

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

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

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 24.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

15 Cashmere View Street should be a suburban character area.

Resource consent should be required before ANY development can proceed.

My submission is that

15 Cashmere View Street should be a suburban character area.

Resource consent should be required before ANY development can proceed.

Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 01/05/2023

First name: SIMON **Last name:** BROWN

Preferred method of contact Email

Postal address: 15 Cashmere View Street

Suburb: Somerfield

City: Christchurch

Country: New Zealand

Postcode: 8024

Email: geddesplumbingnz@gmail.com

Daytime Phone: 0272202458

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.

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

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 25.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

15 Cashmere View Street should be a suburban character area.

Resource consent should be required before ANY development can proceed.

My submission is that

15 Cashmere View Street should be a suburban character area.

Resource consent should be required before ANY development can proceed.

Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 & 14)

Submitter Details

Submission Date: 01/05/2023

First name: Chris **Last name:** Wells

Preferred method of contact Email

Postal address:

Suburb:

City:

Country: New Zealand

Postcode:

Email: kerry.chris1989@gmail.com

Daytime Phone: 0297770059

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

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

Note to person making submission:

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

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 26.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

My submission is that

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

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

Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 01/05/2023

First name: Michael **Last name:** Fisher

Preferred method of contact Email

Postal address: 39 Sandwich Road

Suburb: Beckenham

City: Christchurch

Country: New Zealand

Postcode: 8023

Email: michaeldennisfisher@gmail.com

Daytime Phone: 0223671242

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

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

Note to person making submission:

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

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

Additional requirements for hearing:

Attached Documents

File

Submission on PC

PC 14 Submission points

M Fisher

May 2023

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

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

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 01/05/2023

First name: Sulekha **Last name:** Korgaonkar

Preferred method of contact Email

Postal address: 46 Ryan Street

Suburb: Phillipstown

City: Christchurch

Country: New Zealand

Postcode: 8011

Email: Sulekha1korg@gmail.com

Daytime Phone: 021642332

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 :
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Note to person making submission:

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

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 28.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

My submission is that

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

Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 02/05/2023

First name: Glennis **Last name:** Pattison

Preferred method of contact Email

Postal address: 29 Whitehall Street

Suburb: Mairehau

City: Christchurch

Country: New Zealand

Postcode: 8013

Email: gap.edu@xtra.co.nz

Daytime Phone: 3850590

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
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Note to person making submission:

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

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 29.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

My concerns are for the general proposed changes.

My submission is that

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

housing at commencement of planning a subdivision.

ie sewerage, water supply, roads, schools etc were for the dwellings on original planning for my area and natural light would be affected to existing houses from new higher closer dwellings.

ie noise and mental health would be affected for young and old with constant noise from construction.

ie built up areas can have an detrimental affect on mental health/family life etc

Attached Documents

File

No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 02/05/2023

First name: Paul **Last name:** Cary

Preferred method of contact Email

Postal address: 4 College Avenue

Suburb: Strowan

City: Christchurch

Country: New Zealand

Postcode: 8052

Email: caryfamily@xtra.co.nz

Daytime Phone: 0276654329

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

Note to person making submission:

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

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

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 30.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

My submission is that

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

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

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

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

Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 02/05/2023

First name: john **Last name:** edilson

Preferred method of contact Email

Postal address: 130 Rugby Street

Suburb: Merivale

City: Christchurch

Country: New Zealand

Postcode: 8014

Email: john@curzoncapital.co.nz

Daytime Phone: 021519831

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

I am
directly affected by an effect of the subject matter of the submission that :
a. adversely affects the environment, and
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Note to person making submission:

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

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

Additional requirements for hearing:

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 31.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

Opposing the proposed changes

My submission is that

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

the issue to me and my neighbours is that

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

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

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

Attached Documents

File

No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 & 14)

Submitter Details

Submission Date: 02/05/2023

First name: Tiffany **Last name:** Boyle

Preferred method of contact Email

Postal address:

Suburb:

City:

Country: New Zealand

Postcode:

Email: tiffanyboyle@hotmail.com

Daytime Phone:

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
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Note to person making submission:

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

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 32.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

My submission is that

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

more of a priority than adding in additional housing.

Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 02/05/2023

First name: Aaron **Last name:** Peck

Preferred method of contact Email

Postal address: 40 Farquhars Road

Suburb: Redwood

City: Christchurch

Country: New Zealand

Postcode: 8051

Email: entasis1007@gmail.com

Daytime Phone: 0211565317

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

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 33.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

My submission is that

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

Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 02/05/2023

First name: Terry **Last name:** Blogg

Preferred method of contact Email

Postal address:

Suburb:

City:

Country: New Zealand

Postcode:

Email: tblogg53@gmail.com

Daytime Phone: 021433506

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

Note to person making submission:

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

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

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 34.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

My submission is that

I object to plan change 14 in its entirety for the following reasons: • The process by which the community has been consulted with has caused a general lack of understanding within the community. The documentation provided to the general public has contained numerous misleading and incorrect statements, which have resulted in a vast proportion of the community not able to understand

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

Attached Documents

File

No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 02/05/2023

First name: Melissa **Last name:** Macfarlane

Preferred method of contact Email

Postal address: 48 Malvern Street

Suburb: St Albans

City: Christchurch

Country: New Zealand

Postcode: 8014

Email: melbee_mac@hotmail.com

Daytime Phone: 0273712718

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

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

None.

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 35.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

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

My submission is that

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

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

Attached Documents

File

No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 02/05/2023

First name: Irene **Last name:** Marks

Preferred method of contact Email

Postal address: 50 Ryan Street

Suburb: Phillipstown

City: Christchurch

Country: New Zealand

Postcode: 8011

Email: irene.marks@gmail.com

Daytime Phone: 0210376165

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.

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

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 36.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

My submission is that

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

In the councils new modified PC14 plan.

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

And its bungalows

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

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

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

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

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

Only exacerbate this problem.

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

Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 & 14)

Submitter Details

Submission Date: 02/05/2023

First name: Diane **Last name:** Hide

Preferred method of contact Email

Postal address: Flat 16, 41 Cambridge Terrace

Suburb: Christchurch Central

City: Christchurch

Country: New Zealand

Postcode: 8013

Email: silverstone@xtra.co.nz

Daytime Phone: 0210322616

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

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 37.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area
41 Cambridge Terrace - maintain 14 meter restriction.

My submission is that

I appose any increase in height restrictions in the area/block Cambridge Terrace, Rolleston Avenue, Cashel

Street, Montreal street (north).

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

Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 02/05/2023

First name: Mathias **Last name:** Roehring

Preferred method of contact Email

Postal address: 28 Tauivi Crescent

Suburb: Hei Hei

City: Christchurch

Country: New Zealand

Postcode: 8042

Email: mathias.roehring@gmail.com

Daytime Phone: 021453648

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

I am not
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Note to person making submission:

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

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

Additional requirements for hearing:

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 38.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

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

This will also provide a better opportunity for investors to not only develop properties alongside Ranui St but also to cross from Ranui St to Tauwi Cres. Examples are the recent developments of Gilberthorpes St/Aranui St or Gilberthorpes St/Waterloo Rd.

“Plan A” means for us we can stay on site and maintain our life style.

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

Both options are acceptable within the bigger picture.

Please find the attached file for illustration.

My submission is that

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

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

We are supporting the overall District Plan but we see a significant impact on our quality of life and our financial investment.

We propose 2 options to amend the plan.

Reasoning with reference to the district plan

14.2.1.2

Tauwi Cres is within 550m walking distance of a bus route.

Wycola Park, Hei Hei Community Center, and shops are also less than 800m and no different to other qualified areas in the neighborhood. Hornby Primary School is 1.3km but that’s not different to Ranui St. or other qualified areas.

14.2.4.3

The plan is to keep the Tauwi side of the block at low density and the Ranui side of the block at medium density. Per definition, the privacy of a medium-density area can be compromised but the access to privacy of the low-density area must be good and not be compromised.

Right next to a 2- or 3-storey building, the privacy of the low-density area will be compromised though. Not having any windows or balconies at the medium-density developments would be a significant development limitation. Therefore having the boundary within the block is a significant compromise for both sides and causing long term conflicts.

The same applies to landscaping for the low-density area. The low-density area would be compromised from a landscaping perspective.

Therefore the low-density area right next to the medium-density area would significantly disadvantage the low-density area.

14.2.5.4 iv

A low-density area next to a potentially 12m high building is not an amenity at all.

14.2.5.6 b

Mitigating the adverse effects of this planned boundary in the middle of the block is practically impossible or requires major compromise on both sides. The easiest way is to simply move the boundary from the middle of the block to either side.

3.3.1 a ii

Referring back to the strategic directions: With a low-density property right next to a medium-density property and the adverse effects, the investment certainty is not fostered as required in 3.3.1 a ii as a strategic direction. In contrast, our investment seems to not improve but to deteriorate with the boundary in the planned location within the block.

Loss of land value

With the boundary within the block, the quality of life and the land value of the remaining low-density area side will deteriorate. The loss is not recoverable because larger investors would prefer the MRZ and single home buyers will prefer the RS area with no 2- or 3-storey building next to it. That means the RS land on the Tauwi side will decrease buyer interest.

This financial loss and the deterioration of our quality of life are not acceptable.

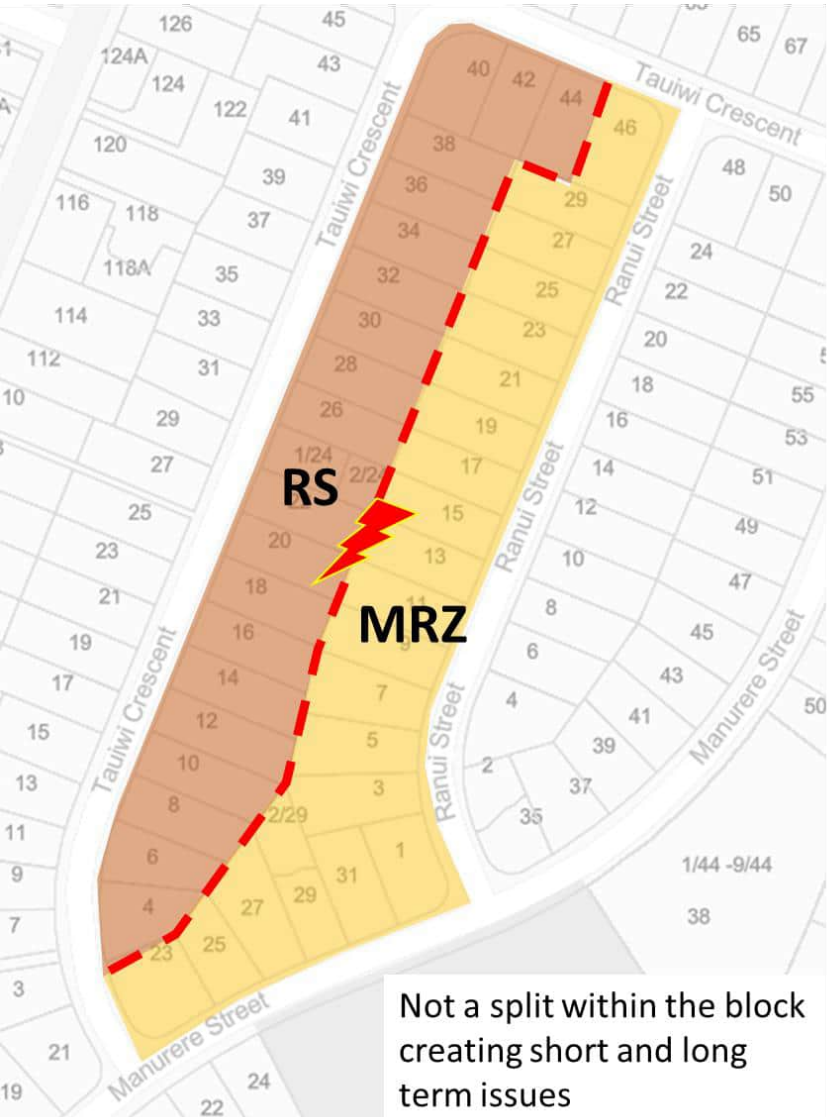
The loss can be eliminated or mitigated by moving the boundary to either side of the block. Then the value will not deteriorate because no conflict with different building styles next to each will occur or both sides get equal opportunities for development and even more because investors can develop across the block not only alongside Ranui St. to recover our quality of life we can then

invest in another property without financial loss caused by the current plan.

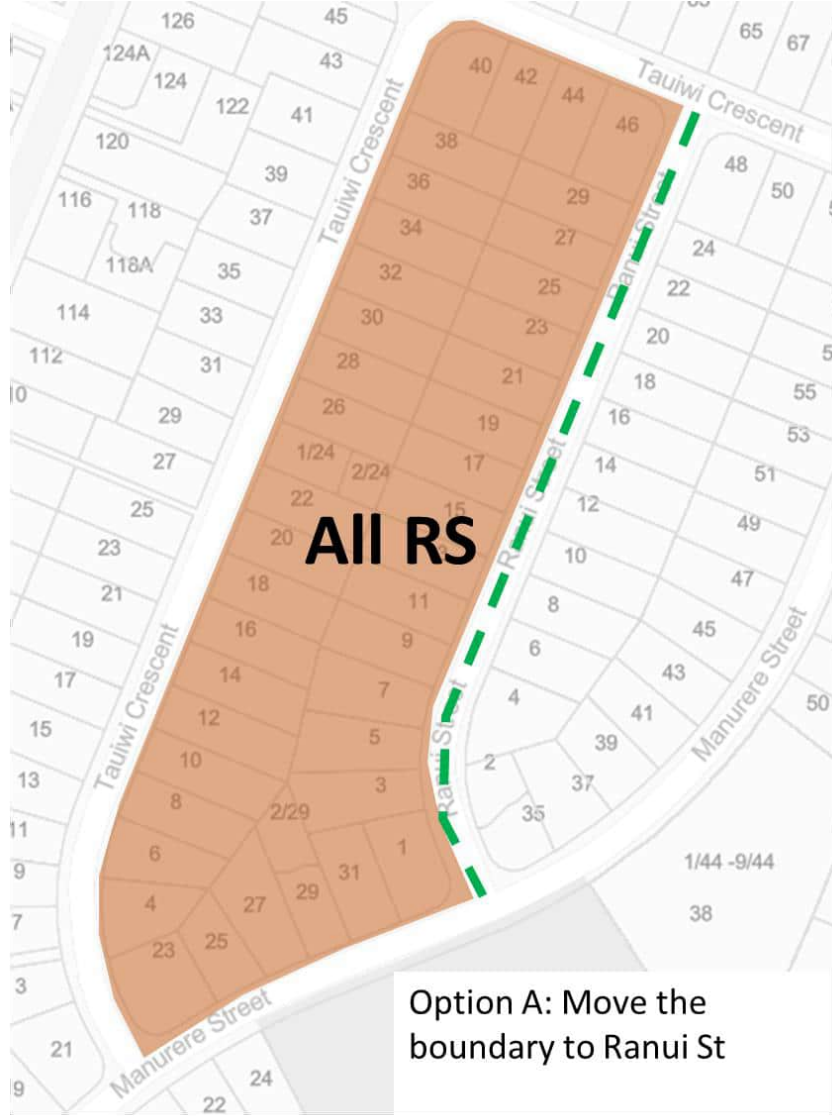
The boundary of RS and MRZ on a street with a natural distance of at least 12m does not cause this conflict.

Attached Documents

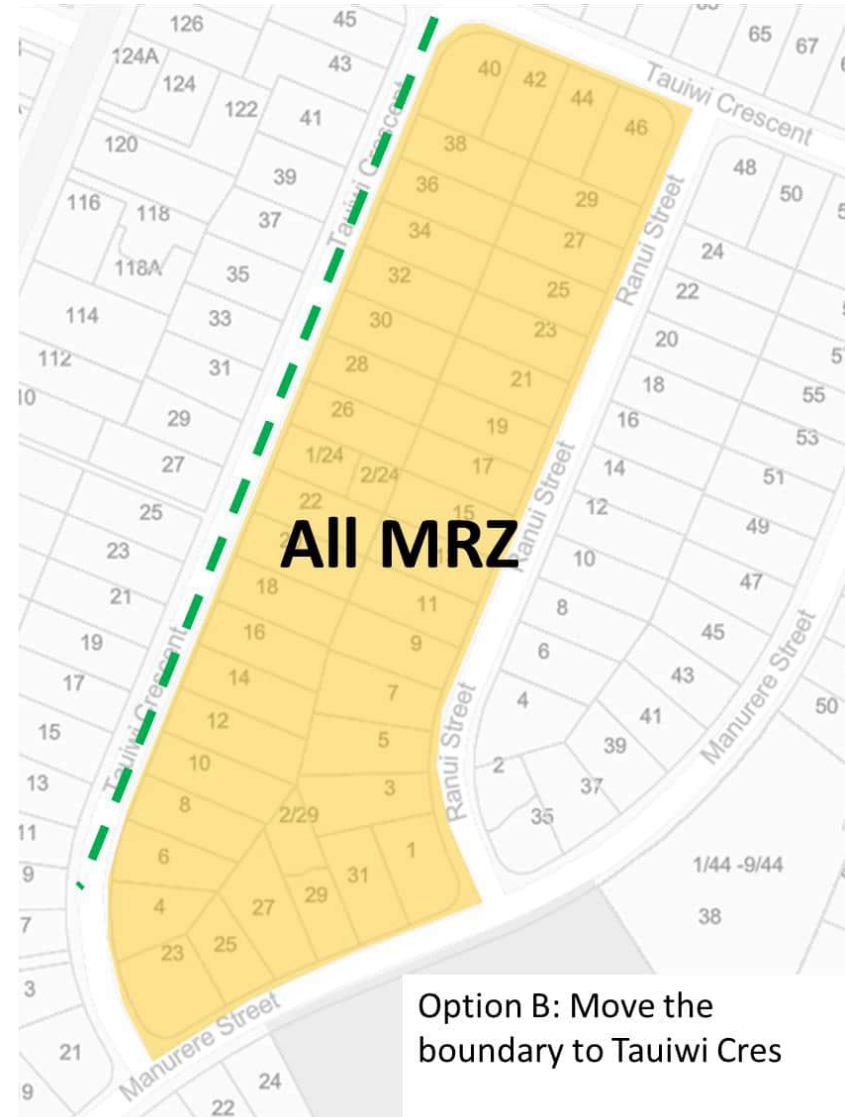
File
Block_Taiwi_Ranui



Not a split within the block creating short and long term issues



Option A: Move the boundary to Ranui St



Option B: Move the boundary to Taiuiwi Cres

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 02/05/2023

First name: Peter **Last name:** Ackroyd

Preferred method of contact Email

Postal address: PO Box 36633

Suburb: Merivale

City: Christchurch

Country: New Zealand

Postcode: 8146

Email: ackroyds.nz@gmail.com

Daytime Phone: 0210466149

I could not
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Would you like to present your submission in person at a hearing?

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 39.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

Remove the HRZ designation from all of the Merivale area.

My submission is that

What a lot of nonsense this whole exercise is. Why is the Council so craven in accepting so called national standards which are really Auckland centric?

I strongly oppose the designation of large parts of our Merivale neighbourhood as HRZ. In particular who was the smart Alec responsible for coming up with this designation for our neighbourhood without consultation or discussion? The whole planning department of the Council should be sacked immediately.

There is a huge amount of intensification happening throughout the city under existing planning laws. We don't need additional requirements for intensification.

As a result of previous planning cock ups the city centre is already suffering from overdevelopment around suburban commercial centres. The aim should be to decrease or minimize residential development around suburban commercial centres - not increase it.

Everyone knows making a submission is a waste of time when there are highly paid city and government bureaucrats with an agenda to follow. What a waste of time and money.

Attached Documents

File

No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 02/05/2023

First name: Colin **Last name:** McGavin

Preferred method of contact Email

Postal address: 103A Paparoa Street

Suburb: Papanui

City: Christchurch

Country: New Zealand

Postcode: 8053

Email: cmcgavin@xtra.co.nz

Daytime Phone: 354 1300

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

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

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

Additional requirements for hearing:

Attached Documents

File

ChristchurchDistrictPlanPhotosMay23

Photographs Supporting Submission.

Photo01-WalkingDistance.jpg

Distance walking from Paparoa St to Northlands Mall is 1.81 Kilometres.

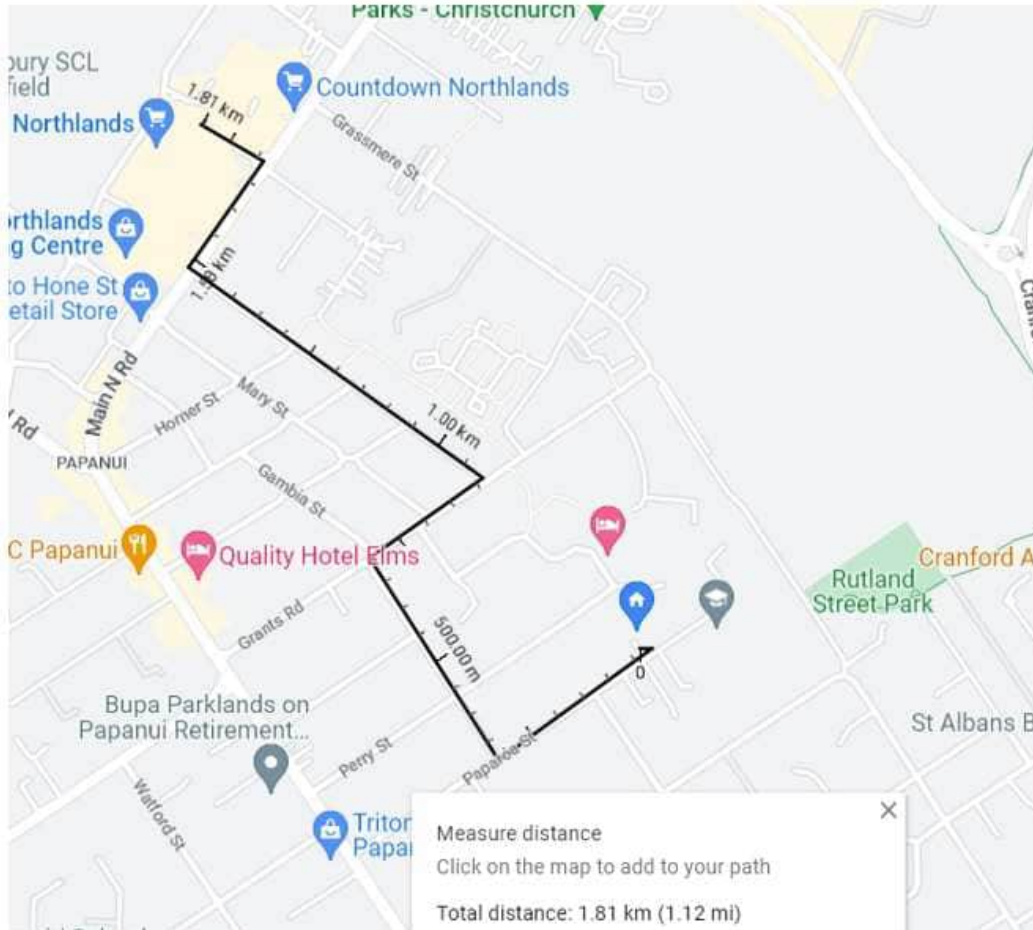


Photo02.TreeLinedStreet.jpg

Photo02 Tree Lined Street



Photo03.Saturday.jpg

Photo03 Saturday



Photo04.DuringSchool.jpg

Photo04 During School



Photo05.MainNorthRoad-2.Jan2008.jpg



Photo06.MainNorthRoad-2.Aug2022.jpg



Photo07.MainNorthRoad-1.Jan2008.jpg



Photo08.MainNorthRoad-1.Aug2022.jpg



Photo09.LangdonsRoad.Jan2008.jpg



Photo10.LangdonsRoad.Aug2022.jpg



Photo11.PapanuiRd.Apr2023.jpg



Photo12.MainNorthRoad.Apr2023.jpg



Our submission:

Transportation - Walkability

Paparoa St is beyond reasonable walking distance from Northlands Mall. It is completely impractical to walk 1.8 km carrying a weekly supermarket shop. We already notice abandoned supermarket trolleys on streets closer to the Northlands Mall than Paparoa Street.

It is also far greater than the Council's own requirement of 1.2 km walkability for the City Centre and smaller walking catchments for other centres (page 12 of Council document 'Have your say on the District Plan Changes').

See attached Photo01.WalkingDistance.jpg

Transportation - Parking

Paparoa Street is being squeezed at both ends by parking requirements, and Paparoa Street is already hazardous for traffic entering and leaving Papanui Road.

In the north, Paparoa Street School is extremely busy with parents dropping off and picking up students. Adding apartments that have no off-street parking requirement will cause significant traffic chaos (and safety risks) during the school terms.

In the south, many (unknown) people use Paparoa Street as an all-day park while they catch the bus on Papanui Road, meaning that street parking availability is very limited. Adding apartments that have no off-street parking requirement will cause significant traffic chaos and frustration.

Community - School Safety

Paparoa Street is host to Paparoa Street School - a high-quality primary school that saturates the parking in Paparoa St during school days. Adding apartments that have no off-street parking requirement (so they park on the street all day) will cause significant traffic chaos during the school terms and seriously impact on parent and child safety.

See attached photos Photo03.Saturday.jpg and Photo04.DuringSchool.jpg

Infrastructure – Water, sewage, stormwater

Paparoa Street was conceived for urban residential living, and has an infrastructure to match. This means that water reticulation and sewage, and electricity supply have been designed with capacity for residential dwellings, not high-density apartment living. Converting Paparoa St to high density living will place an unknown strain on existing infrastructure.

Demographics -Social Impact

The social impact of apartment-living people is undetermined. Apartment dwellers will likely require a lively café and entertainment environment, and a 1.8 km walk to the Northlands Mall and back is unlikely to appeal to apartment dwellers. This is likely to lead to empty apartments, a prelude to a ghetto. We have been unable to locate any City Council research on this topic.

Land Use - Geology

The land quality in Papanui Street is likely not suitable for high density living. If new two storey houses in this area need four-metre driven piles, what would a six storey apartment block need?

Land Use - Elevation Suitability

The ground elevation at Papanui Street is 9-10 metres above mean sea level. The impact of future weather and marine events at this elevation is unknown, but the future impact of climate change and sea level rise must be taken into consideration.

Land Use - Earthquake and Liquefaction Suitability

The Tonkin + Taylor liquefaction vulnerability map produced for Christchurch City Council defines the Papanui area (from Mays Road through to Bishopdale) as 'Medium Liquefaction Vulnerability'. The 'Liquefaction Damage Scale' Tonkin + Taylor provide has a scale of 1 to 7 (1 = less damage, 7 = more damage). Normans Road through Chapel Street has a rating of 5 out of 7 – higher damage risk from liquefaction.

Urban Design - Street Scene

Papanui St and its surrounding streets are visually attractive tree lined streets, typical of those that support the Christchurch image of "The Garden City". They are a pleasant blend of restored 1900s villas and new houses that have been built in a manner that blends new with the old. Removing existing trees and gardens to install high-rise apartment blocks will destroy this image.

See attached photo Photo02.TreeLinedStreet.jpg

Urban Design - Papanui Designation as "Large Town Centre"

Papanui is no longer a 'Large Town Centre', and should now be designated as a 'Town Centre'. In 2008, the Main North Road in Papanui had seven (7) bank branch offices (all with ATMs), an Insurance company and a Post Office. In 2023 it has one bank, one ATM, no Insurance company and no Post Office.

See attached photos Photo05.MainNorthRoad-2.Jan2008.jpg, Photo06.MainNorthRoad-2.Aug2022.jpg, Photo11.PapanuiRd.Apr2023.jpg and Photo12.MainNorthRoad.Apr2023.jpg.

Urban Design - Focal Point of Papanui Town Centre

The current focal centre for the High Density Residential zoning is the "Old Papanui Shopping Precinct" in Papanui Road, Main North Road and the Northlands Mall. The retail shopping focus has now moved to the new shopping precinct (Northlink) on Langdons Road. As a result of this shift of retail, there are now several empty shops in Papanui Road and Main North Road.

See attached photos Photo07.MainNorthRoad-1.Jan2008.jpg and Photo08.MainNorthRoad-1.Aug2022.jpg, Photo09.LangdonsRoad.Jan2008.jpg and Photo10.LangdonsRoad.Aug2022.jpg.

Urban Design - Apartment Blocks should be in Clusters

Apartment blocks have their place in a city, but they should be grouped together so that essential services can be designed and provided in bulk, and water runoff from large wet weather events can be properly predicted and managed.

Urban Design - Better Alternatives Available

There are other areas around Papanui that do not have tree-lined streets, have higher elevation and are further from the sea. An arc centred around Northlink Shopping Precinct, starting at Harewood Road and ending on Main North Road would provide a superior alternative option. The land there is farther from the sea, has a higher elevation, and has a lower liquefaction vulnerability. It is also closer to the Christchurch ring road – a major public transport corridor.

Urban Design - Papanui Heritage Designations (Plan Change 13)

Some streets around Paparoa Street are “Memorial Avenues”, which have been designated as heritage streets by the 2015 Independent Hearings Panel. The Council has acknowledged this in Plan Change 13 (16 Papanui War Memorial Avenues).

Urban Design - Intermingling Heritage Houses with Apartment Blocks

From both a visual and practical perspective, the intermingling of traditional Christchurch housing in tree-lined streets with apartment buildings is, quite simply, bonkers. This is much more than just ‘recession planes’. It is the very essence of Christchurch. Regardless of Government Requirements, this will surely lead to the destruction of Christchurch’s “Garden City” reputation.

Land Use - Requirement for High Density Housing in Christchurch

The re-zoning of Paparoa Street and the Papanui area is unnecessary, because there are large tracts of land in Christchurch already zoned high density residential land that are sitting undeveloped. These will take many years to develop and populate, and avoid the requirements to rezone Paparoa Street and its surrounds.

Community - Destruction of Property Values

The first apartment to go up in the general Papanui area will lead to a downward slide of property value across the area. For many people, whose property is their major financial asset, this will cause widespread dissatisfaction.

Decisions Sought:

Given the multiplicity of items of concern, we propose that the boundary line for High Density Residential zoning be along Harewood Road and Main North Road to the North and West, and the area to the South and East of this boundary line is zoned Residential Suburban.

Photos submitted (with acknowledgements to Google Maps for some screen shots):



Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 02/05/2023

First name: Aaron **Last name:** Jaggar

Preferred method of contact Email

Postal address: 64 Ryan Street

Suburb: Phillipstown

City: Christchurch

Country: New Zealand

Postcode: 8011

Email: aaron.jaggar@gmail.com

Daytime Phone: 021923853

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

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 41.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

As per above. List Ryan Street as a Character Street but continue to allow consented developments but not the Government's proposed medium density housing without consent.

My submission is that

I support the recommendation to list Ryan Street as a character Street and exempt it from there Government's

medium density housing rules where 3 properties can be built without consent. I believe that would disrupt the character of the street which is one of the few tree lined streets in the region. It also one best street in 1974.

However, I would not want this decision to block consented development from taking place in the future. The sections are very large and suitable for development including my own which is 1180m2. The region is currently in a medium density transition zone which allows with consented development within the CCC district plan. I would like this to remain in place such is the case with 32-36 Ryan Street where several modern townhouses have been built. The street is close to Te Aratai College, Edmonds Park, transport of Ferry Road and close to Eastgate. This makes the street very suitable for development as per the CCC current district plan.

Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 & 14)

Submitter Details

Submission Date: 02/05/2023

First name: Sue **Last name:** Sunderland

Preferred method of contact Email

Postal address:

Suburb:

City:

Country: New Zealand

Postcode:

Email: hounddogz@outlook.co.nz

Daytime Phone: 0273555806

I could not
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Would you like to present your submission in person at a hearing?

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 42.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

No change to Chapter 14 Residential.

My submission is that

I object to changes in the plan under Chapter 14 Residential, Higher Density. Christchurch calls itself the garden city that has beautiful trees and a lovely layout. Higher density is in opposition to this. I live in the zone of

Merivale that runs from Carlton Mill Road to Rossall Street across to Papanui Road and through to Heaton Street. In this area after the EQs businesses were allowed to operate from residential properties. Turn these back to residential. That was initially the thought behind this allowance in operating a business in a residential zone.

if Chch city wants to implement a change to the Plan in Chapter 14 then do this within the city's four avenues. There are plenty of empty sections here that could have huge residential developments and accommodate high density living. Perhaps if Council contacted the owners Ngi Tahu /developers, etc who are land-banking, to free up their sites to enable building on them.

To put a 4-10 storey new build in an already cluttered neighbourhood like Merivale where the roads are narrow, there is already high traffic congestion from the private and general schools, Merivale Mall, St George's, Nurse Maude and Merivale Village will only exacerbate the problems of a fragile community.

I do not I want a developer knocking down houses to build up to 10 storey residential buildings which will block sunlight, views, remove trees, causing parking issues. We already have trouble getting roading and footpaths repaired in the area. The level of service has spiralled downward and will further deteriorate, if possible, with more crowding and overuse. Reported on many times but no resolution.

If the council has to put high density somewhere then put it in an areas that are void of character as mention above, within the four avenues or in the concrete jungle of Riccarton between Riccarton and Blenheim Roads. This is a view to the future if this planned change proceeds. No greenery, congestion, of traffic, dense housing, untidy ugly zone.

Auckland may need higher density because of its population growth not Christchurch. If the plan is not altered to suit the area concerned then the area will be ruined completely.

kind regards

Sue and Denis Sunderland

Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 02/05/2023

First name: Bill **Last name:** Marks

Preferred method of contact Email

Postal address: 50 Ryan Street

Suburb: Phillipstown

City: Christchurch

Country: New Zealand

Postcode: 8011

Email: billmarks8@gmail.com

Daytime Phone: 02041563578

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

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 43.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

Ryan Street should be kept as a character street and no more intensive development as at 32 to 36 where seven units have been crammed on this section. These will result in parking problems and storm water problems in an

area that already has flooding problems.

Although some bungalows have had some cladding changes I don't see this as a detraction to it's character status.

My submission is that

I support the designation of Ryan Street as a Character area.

In my opinion it is a fine example of a 1930's street with it's mostly original bungalows and it's fine trees.

Ryan Street also has had recognition in 1974 when it won an award as a well kept beautiful street!

Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 02/05/2023

First name: anthony william **Last name:** norbert-munns

Preferred method of contact Email

Postal address: PO Box 210

Suburb:

City: Christchurch

Country: New Zealand

Postcode: 8140

Email: tonym01@hotmail.com

Daytime Phone: 0274321297

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

Yes

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Consultation Document Submissions

Original Submitter:

Original Point:

Points: 44.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

My submission is that

1. I wish to join submission number 50982
2. Ask CCC to consider making Allister Avenue a one way street running east to west. Leaving present parking as is. There is no room for a two way road even if one side was banned from car parking.
3. All right hand turns from Leinster Road+ Allister Ave + Heaton street are stopped. The major build ups in all streets is a serious worry.
4. Students in this area I can count in minutes, over 100 at peak times, something will go wrong soon. There are 6 schools in the immediate area then add Christchurch Girls and Boys High School to this.
5. A perfect solution would be to block Allister Ave off at the Leinster Road end but imagine that is dreaming. I understand that about 1920 it was blocked to public access. Worth consideration when peoples safety is involved.
6. I can be contacted at anytime but I am out of NZ from 12th May until 3 June, 2023.

A W N-M

Support with submission 50982 (neighbour)

SAME FAMILY RESIDENT SINCE 1925

Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 02/05/2023

First name: Hebe **Last name:** Gibson

Organisation: Te Mana Ora/Community and Public Health

Preferred method of contact Email

Postal address: 310 Manchester Street

Suburb: Christchurch Central

City: Christchurch

Country: New Zealand

Postcode: 8013

Email: submissions@cdhb.health.nz

Daytime Phone:

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

Yes

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

Attached Documents

File

SubmissionFINAL230502

2 May 2023

Christchurch City Council
PO Box 73016
Christchurch

Tēnā koutou,

Submission on proposed Heritage Plan Change (PC13) and Housing and Business Choice Plan Change (PC14).

1. Thank you for the opportunity to submit on proposed Heritage Plan Change (PC13) and Housing and Business Choice Plan Change (PC14). This submission has been compiled by Te Mana Ora (Community and Public Health) on behalf of the National Public Health Service and Te Whatu Ora Waitaha. Te Mana Ora recognises its responsibilities to improve, promote and protect the health of people and communities of Aotearoa New Zealand under the Pae Ora Act 2022 and the Health Act 1956.
2. This submission sets out matters of interest and concern to Te Mana Ora.

General Comments

3. Te Mana Ora welcomes the opportunity to comment on the proposed Heritage Plan Change (PC13) and Housing and Business Choice Plan Change (PC14).
4. While health care services are an important determinant of health, health is also influenced by a wide range of factors beyond the health sector, including the housing and communities we live in. These influences are often referred to as the 'social determinants of health'.¹

¹ Public Health Advisory Committee. 2004. *The Health of People and Communities. A Way Forward: Public Policy and the Economic Determinants of Health*. Public Health Advisory Committee: Wellington.

5. The diagram² below shows how the various influences on health are complex and interlinked (Figure 1). Initiatives to improve health outcomes and overall quality of life must involve organisations and groups beyond the health sector, such as local government if they are to have a reasonable impact.

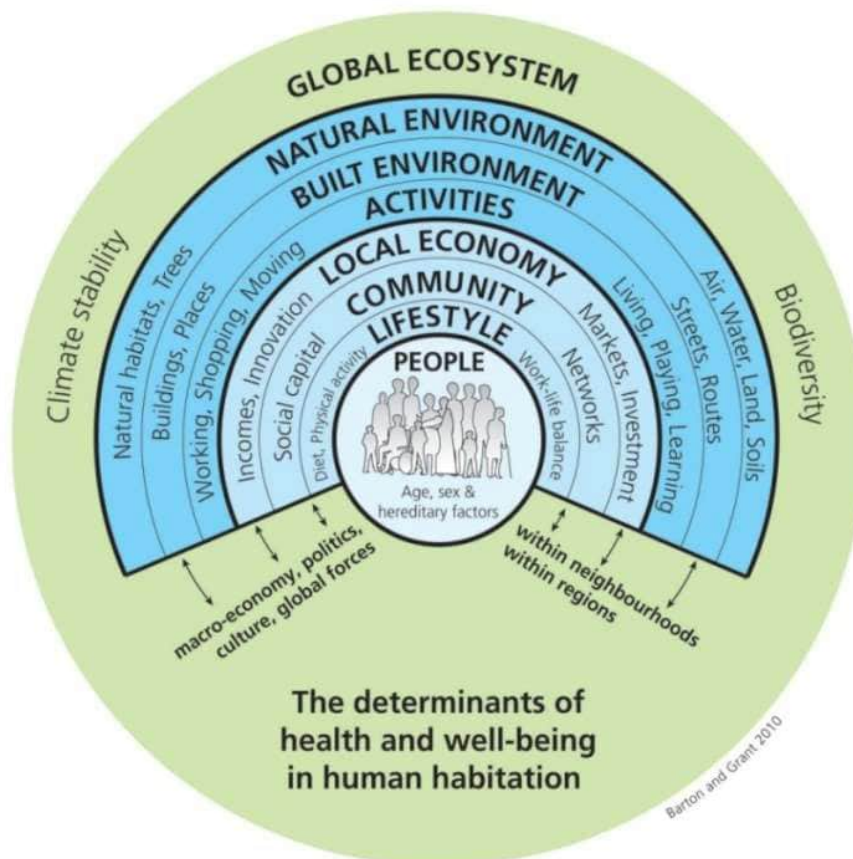


Figure 1: Determinants of health and wellbeing

6. Housing is a critical determinant of health. We spend considerable amounts of time in our homes; young children and older people in Aotearoa New Zealand spend close to

² Barton, H and Grant, M. (2006) A health map for the local human habitat. *The Journal of the Royal Society for the Promotion of Health* 126 (6), pp 252-253. <http://www.bne.uwe.ac.uk/who/healthmap/default.asp>

90% of their time at home.³ Therefore, it is critical that home environments are healthy, warm and dry to support health and wellbeing.

7. Lack of access to quality healthy homes results in health inequities. BRANZ research highlights the importance of housing conditions to occupant wellbeing, noting that people living in poor housing conditions had lower life satisfaction ratings and lower self-ratings of physical and mental health.⁴
8. Additionally, affordable housing is necessary to support better health outcomes for communities. Unstable, insecure and unaffordable housing also has detrimental impacts on physical and mental health, and education outcomes.⁵ Unaffordable housing can also result in household crowding which leads to an increased risk in infectious diseases. Infectious diseases are still the main cause for hospitalisation in Aotearoa New Zealand, largely due to overcrowded households.⁶
9. While Te Mana Ora recognises that there has been controversy in applying the Medium-Density Residential Standards (MDRS) set out in the Resource Management (Enabling Housing and Other Matters) Amendment Act and the National Policy Statement on Urban Development (NPS-UD) 2020 in Ōtautahi Christchurch, Te Mana Ora supports this Government direction. Te Mana Ora recognises the value of building up in existing commercial centres where there is already infrastructure and services in place. Increasing the density of housing, creating more compact urban environments and enabling more affordable housing, can have a positive influence on population health outcomes.
10. Urban environments have been designed in ways that can contribute to poor health outcomes, including through air pollution, noise, heat islands, enabling inactive

³ Howden-Chapman, P., Fyfe, C., Nathan, K., Keall, M., Riggs, L., & Pierse, N. (2021). The effects of housing on health and well-being in Aotearoa New Zealand. *New Zealand Population Review*, 47, 16-32

⁴ Jones, S. & White, V. (2023). *Housing condition and occupant wellbeing: Findings from the Pilot Housing Survey and General Social Survey 2018/19*. BRANZ Study Report SR482. BRANZ Ltd.

⁵ Mueller, E. J., & Tighe, J. R. (2007). Making the case for affordable housing: Connecting housing with health and education outcomes. *Journal of Planning Literature*, 21(4), 371-385.

⁶ Howden-Chapman, P., Fyfe, C., Nathan, K., Keall, M., Riggs, L., & Pierse, N. (2021). The effects of housing on health and well-being in Aotearoa New Zealand. *New Zealand Population Review*, 47, 16-32.

behaviours, and reducing community connectedness.⁷ Te Mana Ora challenges Christchurch City Council to see these plan changes as an opportunity to influence the health and wellbeing of residents in Ōtautahi Christchurch and create better conditions for more health promoting communities.

11. To support the design of health promoting communities, Te Mana Ora recommends that Christchurch City Council uses the Integrated Planning Guide (IPG) when planning housing and neighbourhoods. The IPG, developed by Te Mana Ora with Greater Christchurch Partnership partners, takes a holistic view of health and wellbeing to plan in ways that build stronger and more sustainable social, economic and environmental outcomes.⁸
12. Te Mana Ora also recommends that Christchurch City Council considers other factors that the Council can influence with these plan changes. Within the Consultation Document, there is a list of factors 'we can influence' highlighted on page 7. However, Te Mana Ora argues that there are further opportunities to influence health and wellbeing outcomes of communities in Ōtautahi Christchurch through these plan changes. For example, the Christchurch City Council could influence climate change resilience, community connectedness, housing affordability and diversity, access to green space and tree cover, and the design of urban environments alongside these proposed changes. Our comments below set out why it is important to influence these other factors.

⁷ Nieuwenhuijsen, M., Khreis, H., & SpringerLink (Online service). (2019;2018;). In Nieuwenhuijsen M., Khreis H.(Eds.), *Integrating human health into urban and transport planning: A framework* (1st 2019. ed.). Springer International Publishing. <https://doi.org/10.1007/978-3-319-74983-9>

⁸ Health in All Policies Team, Te Mana Ora/Community and Public Health (2022). *Integrated Planning Guide for a healthy, sustainable and resilient future - version 3.2*. Christchurch. New Zealand: Te Whatu Ora

Specific Comments

Meeting Housing Demands: Climate Change

13. Te Mana Ora supports increasing the density of housing and creating more compact urban environments, to meet the needs of the growing population in Ōtautahi Christchurch. As highlighted within the Housing and Business Choice and Heritage Consultation Document, 40,000 more houses will be needed to meet demand in the next 30 years. The growing need for housing, alongside the risks and impacts of climate change need to be carefully considered.
14. The National Adaptation Plan 2022 noted that there is increasing risk to housing from extreme weather events, drought, increased fire weather and sea-level rise.⁹ Climate change is already severely impacting communities in Aotearoa New Zealand as highlighted by recent events, including the damage caused by flooding in Auckland and by Cyclone Gabrielle in Hawke's Bay and Gisborne.
15. Damaged housing and displacement caused by extreme weather events and climate change will impact the existing housing supply, resulting in increased demand and impacting affordability. In Aotearoa New Zealand, about 675,000 people live in flood prone areas and 72,000 people live in areas at risk of storm surges.¹⁰ These numbers will only increase as extreme weather events increase and sea-levels rise, putting additional pressure on housing.
16. Te Mana Ora supports the proposed Qualifying Matters related to high-risk natural hazards, including coastal inundation, coastal erosion and tsunami hazard. Building housing in areas that are at risk of flooding and sea level rise will only compound issues of housing availability and affordability. Therefore, limiting density in high-risk areas and increasing housing density in areas of Ōtautahi Christchurch that are less exposed to climate risks will increase our resilience to climate change and support our housing needs as we experience more extreme weather and greater impacts from climate change around Aotearoa New Zealand.

⁹ Ministry for the Environment. 2022. *Aotearoa New Zealand's first national adaptation plan*. Wellington. Ministry for the Environment.

¹⁰ Ministry for the Environment. 2022. *Aotearoa New Zealand's first national adaptation plan*. Wellington. Ministry for the Environment.

Health Promoting Neighbourhoods: Community Connectedness and Privacy

17. Te Mana Ora recognises the need to plan for and build housing and neighbourhoods that facilitate a sense of community and social connection. Spaces that encourage positive socio-cultural passive or active activity are good for the wellbeing of individuals and for community cohesion. Equally, it is important to consider the need for privacy in housing design and development. Privacy, safety and access to services are all effects that Christchurch City Council can influence through the Housing and Business Choice Plan Change.
18. Housing developments, such as high-rise apartment buildings, can contribute to feelings of social isolation and anonymity.¹¹ Te Mana Ora recommends that Christchurch City Council considers how housing developments can be designed in a way that encourages social interaction. For example, shared spaces, such as green spaces, paths and bike sheds, can facilitate social interaction in housing developments.
19. Te Mana Ora supports the proposed the objective of high-quality residential environments (14.2.5) and the policies under this objective. Te Mana Ora also supports the proposed residential design principle 'site layout and context' (rule 14.15.1).
20. Living in housing that provides visual and physical connectivity to streets and spaces helps people feel present and part of a community. Te Mana Ora notes the proposed controls for street-facing glazing and recommend including a requirement for a percentage of new housing to orientate living spaces to streets and public or shared open space as a rule not only as matter of discretion.
21. Alongside community connectedness, Te Mana Ora notes the importance of a sense of privacy in household design for residents' health and wellbeing. Privacy at home allows space for important personal, cultural and religious practices, as well as space to connect with loved ones and family members.¹² Privacy means that home can be a

¹¹ Nguyen, L., van den Berg, P., Kemperman, A., & Mohammadi, M. (2020). Where do people interact in high-rise apartment buildings? Exploring the influence of personal and neighborhood characteristics. *International journal of environmental research and public health*, 17(13), 4619.

¹² Willems, S., De Smet, H., & Heylighen, A. (2020). Seeking a balance between privacy and connectedness in housing for refugees. *Journal of Housing and the Built Environment*, 35(1), 45-64. <https://doi.org/10.1007/s10901-020-09727-7>

place of retreat and relaxation¹³, whereas a lack of privacy can mean a home environment does not feel safe or secure.¹⁴

22. Additionally, it is important to consider how housing developments can support crime prevention. There are a number of Crime Prevention Through Environmental Design (CPTED) principles that can be included in housing design, such as ensuring that windows and doorways look out on public spaces and the street, making sure trees and shrubs do not block the street view, and ensuring there is appropriate lighting on the street and footpaths.¹⁵ Te Mana Ora supports the proposed changes to the safety section of the residential design principles (14.15.1 h) which strengthen CPTED principles to achieve a safe, secure environment.

Health Promoting Neighbourhoods: Healthy Streets

23. It is also important to consider how neighbourhood design can contribute to social connection and sense of community. Neighbourhoods can influence opportunities for meaningful social interaction, including through the layout of streets, local amenities and public spaces. Places that encourage social interaction are designed to be accessible by all, have destinations for friends to meet, and have ‘bumping spaces’ for interactions, such as street furniture.¹⁶

24. The Healthy Streets Approach is a useful tool for conceptualising how neighbourhood design can facilitate sense of community and social connection. The Healthy Streets Indicators outline aspects of the human experience of being on streets that should be considered when planning public spaces (Figure 2). Te Mana Ora recommends that Christchurch City Council considers incorporating the Healthy Streets Approach into matters of control and discretion to create places that are vibrant and inclusive, where people feel safe and relaxed and there are things to do and see. Considering how to

¹³ Easthope, H. (2004). A place called home. *Housing, Theory, and Society*, 21(3), 128-138. <https://doi.org/10.1080/14036090410021360>

¹⁴ Easthope, H. (2004). A place called home. *Housing, Theory, and Society*, 21(3), 128-138. <https://doi.org/10.1080/14036090410021360>

¹⁵ Canterbury Safety Working Party. (2004). Safer Canterbury: Creating Safer Communities. Accessed from: <https://www.ccc.govt.nz/assets/Documents/Culture-Community/Community-Safety/CPTEDFull-docs.pdf>

¹⁶ Campaign to End Loneliness. (2023). Tackling Loneliness through the Built Environment. Accessed from: <https://www.campaigntoendloneliness.org/tackling-loneliness/tackling-loneliness-through-the-built-environment/>

make places attractive is also important when rezoning areas of the city, such as industrial areas, which may lack such place-making features.

25. Introducing higher density housing has the potential to put greater pressure on roads and car parking. Te Mana Ora recommends that the Council uses the Healthy Streets Approach to consider how to make walking and cycling more attractive and challenge car dominance. As noted in the Consultation Document, planning decisions have been based on the 'walkable catchments' of commercial centres so enhancing the walkability of Ōtautahi Christchurch should be prioritised.



Figure 2: The Healthy Streets Indicators

Health Promoting Neighbourhoods: Climate Resilience and Green Space

26. Climate resilient communities need access to green spaces to reduce the urban heat island effect, to enable biodiversity, support urban tree cover and provide spaces that encourage community connection and physical activity.
27. Results from the Huihui Mai Engagement showed that many people in Greater Christchurch are open to high density living but that access to green spaces, gardens and green neighbourhoods was a key consideration.¹⁷
28. Te Mana Ora supports the different proposals to support tree cover in the Housing and Business Choice Plan Change Consultation Document, including to update tree setbacks to better protect individual trees and to incentivise more tree planting, Financial Contributions, and the Schedule of Significant and Other Trees becoming a Qualifying matter.
29. Trees are important for climate change mitigation, because trees remove carbon dioxide from the atmosphere, and for climate change adaptation because trees can lower temperatures and can reduce the impacts of stormwater. It is critical that the benefit of trees and green spaces are considered in conjunction with the need for high and medium density housing.
30. Trees, especially old trees, are similar to cultural and heritage sites, they are symbolic of a sense of place, connection, and identifying features of a place. Additionally, access to trees and green spaces has significant impact on a community's wellbeing, their behaviours, and relationship with nature. A recent study showed that residents living in areas with greater tree cover, were much more likely to spend time in public green spaces. Furthermore, trees provide shade and protection from the sun, which is a Healthy Street Indicator.
31. Some neighbourhoods and areas of Ōtautahi Christchurch are already comparatively lacking in tree cover and accessible public green spaces, for example, the tree cover in

¹⁷ Greater Christchurch Partnership. (2023). Huihui Mai: Coming together to make a plan. Accessed from: <https://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch-/Huihui-Mai-Engagement-Summary.pdf>

Linwood is around 8.9% compared with Fendalton which has 19% tree cover.¹⁸ Te Mana Ora strongly supports the draft Urban Forest Plan and recommends that Christchurch City Council considers the areas where trees need to be particularly protected, and also which areas need to be replanted to ensure more equitable access and connections with the environment throughout the city.

32. Te Mana Ora recommends that Christchurch City Council considers establishing new green spaces within housing intensification, to support the growing population of Ōtautahi Christchurch. The uneven distribution of urban green spaces is a significant concern in cities worldwide that have focused on intensifying development. Christchurch City Council has the opportunity to consider how to mitigate this problem before the intensification of development begins.

Residential Heritage Areas

33. Te Mana Ora supports the protection of Residential Heritage Areas and recognises the need to balance housing development with protecting areas of cultural heritage and identity. Engagement with cultural heritage promotes community wellbeing, and these shared spaces support community belonging and identity.¹⁹

Additional comments

Meeting Housing Demands: Affordability

34. Te Mana Ora supports the development of more affordable, health promoting housing in Ōtautahi Christchurch.
35. Te Mana Ora commends Christchurch City Council for their long history of providing social housing for people with serious housing need and recommends Christchurch City Council considers how to ensure sufficient social housing is included in future housing developments.

¹⁸ Law, T. (2022). Time running out to save Christchurch's trees from housing intensification. Stuff News: <https://www.stuff.co.nz/the-press/news/127846951/time-running-out-to-save-christchurchs-trees-from-housing-intensification>

¹⁹ Taçon, P. S., & Baker, S. (2019). New and emerging challenges to heritage and well-being: A critical review. *Heritage*, 2(2), 1300-1315.

36. Te Mana Ora defines social housing as affordable housing for people on low income or with complex needs, which is subsidised by the Government or Local Government, or a non-government organisation (NGO). In December 2022, there were 23,127 applicants on the Housing Register waiting for public housing across Aotearoa New Zealand.²⁰ The demand for social housing, alongside the health and wellbeing impacts of unaffordable, insecure housing, means that is critical for Christchurch City Council to put in place clear plans to provide social housing in Ōtautahi Christchurch within the building intensification plans.

Meeting Housing Demands: Diversity, Quality and Accessibility

37. As stated in the Consultation Document, Christchurch City Council will consider design in the resource consent process. Te Mana Ora recommends that Christchurch City Council uses the resource consent process to improve the design of new housing developments, including attention to universal design (see paragraph 42) and good ventilation (see paragraph 41).

38. While these proposed plan changes will enable more housing and MDRS Policy 1 (14.2.3.2) enables “a variety of housing types with a mix of densities within the zone, including 3-storey attached and detached dwellings, and low-rise apartments”, Te Mana Ora encourages Christchurch City Council to consider how to ensure this will be achieved and how increased density and subdivision will provide diversity of housing stock that caters to range of population groups with different needs. Providing a diversity of housing stock and a mix of residential densities can give everyone more choice about where to live.

39. New housing developments should cater to a range of household sizes.

Intergenerational living is common among Pacific communities which means housing stock in Aotearoa New Zealand is often unsuitable for this population group.²¹ While there are social and cultural benefits of intergenerational living, overcrowded housing

²⁰ Ministry of Social Development. (2023). Housing Register. Accessed from: <https://www.msd.govt.nz/about-msd-and-our-work/publications-resources/statistics/housing/housing-register.html>

²¹ Stats NZ. (2023). Aotearoa's housing often unsuited to Pacific families. Accessed from: <https://www.stats.govt.nz/news/aotearoas-housing-often-unsuited-to-pacific-families/>

can have negative impacts on physical health. Providing housing for a range of household sizes will create more opportunities for large households to live in healthy, suitable and secure housing.

40. Te Mana Ora supports the inclusion of the conditions for managed consents for increased heights beyond those enabled within medium and high-density zoned area (14.2.3.7), including that provision for “a greater variety of housing types, price points and sizes when compared to what is provided in the surrounding area” (14.2.3.7 i), and encourages Christchurch City Council to investigate ways to apply these to enabled development as well.
41. Indoor air quality should also be considered in housing design. Poor ventilation in building design increases the likelihood of airborne disease transmission, especially in overcrowded environments. Building houses that have good ventilation can improve indoor air quality and protect health, such as by reducing transmission of respiratory illnesses including COVID-19, influenza and tuberculosis.²² Good ventilation protects against build-up of harmful substances such as carbon dioxide. This is a health issue which has not been adequately considered in residential buildings till now.
42. A universal design approach to housing design makes housing accessible for people at any stage of life and with different abilities. Universal design standards accommodate people who use wheelchairs or other mobility aids, people with impaired vision and people who are elderly or very young. Housing that incorporates universal design features will be less likely to need to be modified to suit people with different needs, and therefore can be marketed to a wider audience. While the need for universal design could be added to Policy 14.2.2.6 – Provision of housing for aging population, it is applicable to a much wider range of people. Universal design standards should also be applied to new streetscapes and buildings so that they are accessible for all people.

²² Bennett, J., Shorter, C., Kvalsvig, A., Barnard, L. T., Wilson, N., Crane, J., ... & Howden-Chapman, P. (2022). Indoor air quality, largely neglected and in urgent need of a refresh. *The New Zealand Medical Journal (Online)*, 135(1559), 136-139.

43. Disabled people on the waitlist for public housing in Aotearoa New Zealand who are looking for accessible housing wait 90 days longer than non-disabled people.²³ The average wait time for people who have requested a modified house is 434 days. This confirms the need for more housing following universal design standards. Te Mana Ora recommends that Christchurch City Council considers how to ensure that new housing is both accessible and affordable.

44. Te Mana Ora recommends that accessibility plans be required to support quality large scale developments (Policy 14.2.5.3) and other high-density developments or neighbourhoods so that local accessibility needs are understood and provided for.

Conclusion

45. Te Mana Ora does not wish to be heard in support of this submission.

46. If others make a similar submission, the submitter will not consider presenting a joint case with them at the hearing.

47. Thank you for the opportunity to submit on proposed Heritage Plan Change (PC13) and Housing and Business Choice Plan Change (PC14).

Ngā mihi,



Vince Barry

Regional Director Public Health Te Waipounamu
National Public Health Service

²³ Shivas, S. (2023). People who need modified public housing have to wait three-months longer than non-disabled, MSD data reveals. Stuff. Accessed from: <https://www.stuff.co.nz/life-style/homed/houses/131850774/people-who-need-modified-public-housing-have-to-wait-threemonths-longer-than-nondisabled-msd-data-reveals>

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 02/05/2023

First name: Julie **Last name:** Kidd

Preferred method of contact Email

Postal address: 4 Postbridge Lane

Suburb: Huntsbury

City: Christchurch

Country: New Zealand

Postcode: 8022

Email: juliekidd@xtra.co.nz

Daytime Phone:

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

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

Note to person making submission:

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

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

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 46.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

My submission is that

I wish to comment on qualifying matters, in particular to endorse changes that protect the amount of sunlight buildings are exposed to, at least to a level that is equivalent to the level of exposure of a building in Auckland. As a retired doctor, I am aware of the connection between exposure to bright light and wellbeing, especially mood. Living in a building where there is no exposure to

sunlight for 5 months of the year could be detrimental to health, especially for people who have reasons why they are unable to be out of the house for much of the time. I do support the principle of increased urban density of housing stock to allow people to live closer to transport and amenities, but not at the expense of other aspects of health and wellbeing. For this reason, I also support as much being done as possible to maintain tree canopy cover.

Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 02/05/2023

First name: Rohan **Last name:** A Collett

Preferred method of contact Email

Postal address: 29 Westburn Terrace

Suburb: Burnside

City: Christchurch

Country: New Zealand

Postcode: 8041

Email: rohan@collettarchitects.co.nz

Daytime Phone: +64272039967

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

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

Note to person making submission:

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

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

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 47.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

My submission is that

The Airport Noise Corridor (which runs between Fendalton/Riccarton to the airport) is not a Qualifying Matter as planes only use this path when the wind direction is north-west or south-east, which according to NIWA records is

less than 3% of the time. Omitting this large area of land from MDRS because of detrimental effects from planes flying overhead for 3% of the time seems ridiculous.

That all outdoor living spaces are required to be located on the east, north or west sides of dwellings not on the south side.

That all of the CBD is rezoned Mixed Use to promote diversity of space and help activate the city for longer periods.

Living Hills zone has the density increased by encouraging more smaller units instead of larger single units.

Minimum heights in the High Density Residential area is increased from two-stories to 3-4 stories to better reflect the intended increase in density in these centralised areas.

Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 02/05/2023

First name: Curtis **Last name:** Bush

Preferred method of contact Email

Postal address: 1 Therese Street

Suburb: Spreydon

City: Christchurch

Country: New Zealand

Postcode: 8024

Email: curtis@stealthconstruction.co.nz

Daytime Phone: 0273103916

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

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

Note to person making submission:

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

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

Yes

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

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 49.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

Therese Street, Spreydon

My submission is that

I am writing this submission to express my strong opposition to the creation of a medium density residential zone in our neighborhood. This decision will have a significant impact on our community's living conditions, and I urge

you to reconsider this plan.

One of the main reasons why we chose to live in this area is because of its peaceful and quiet nature. However, allowing tall buildings to be built will result in increased noise pollution, reduced privacy, and loss of natural light. It will also change the character of our neighborhood, making it more urban and less residential.

Furthermore, the densification of our area will put a strain on existing infrastructure such as roads, parking, and importantly water services which we often see struggle with consistent rainfall as is, I would hate to see what the effects will be on this struggling infrastructure with increased water catchment from densified construction. The increased population density will lead to congestion, longer commute times, and more pollution, which will have a negative impact on our health and wellbeing.

The proposed development will also impact the local ecosystem and wildlife. The trees and green spaces of existing backyards that provide us with fresh air and natural beauty will be destroyed. This loss of natural resources will have long-term negative effects on the environment and our quality of life.

Moreover, allowing developers to build tall buildings will lead to the displacement of long-time residents who have called this area home for years. These individuals and families will be forced to leave their homes and communities, which will lead to the loss of community connections and cultural heritage.

In conclusion, I strongly urge the council to reconsider this decision to densify our residential area. We chose to live here because of the peaceful and quiet nature of our neighborhood, and we do not want that to change. The negative impact on our living conditions, infrastructure, environment, and community far outweighs any perceived benefits of densification.

I urge you to prioritize the needs and wishes of the residents over what can only be seen and the interests of the consent fee hungry CCC and the developers that feed them.

Attached Documents

File
No records to display.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 09/05/2023

First name: Terri **Last name:** Winder

Preferred method of contact Email

Postal address: PO Box 1845

Suburb:

City: Christchurch

Country: New Zealand

Postcode: 8140

Email: terri@planzconsultants.co.nz

Daytime Phone: 0212259323

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

Refer to attached submission.

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 50.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

Refer to attached submission.

My submission is that

Refer to attached submission.

Original Submitter:

Original Point:

Points: 50.2

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

Refer to attached submission.

My submission is that

Refer to attached submission.

Attached Documents

File
J16644 Ceres PC13 and PC14 Submission FINAL 20230508

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 09/05/2023

First name: Terri **Last name:** Winder

Preferred method of contact Email

Postal address: PO Box 1845

Suburb:

City: Christchurch

Country: New Zealand

Postcode: 8140

Email: terri@planzconsultants.co.nz

Daytime Phone: 0212259323

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

Refer to submission.

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 50.3

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

Refer to attached submission.

My submission is that

Due to the ambiguity regarding which provisions are notified under PC13 and PC14, the submitter lodges their submission on both to ensure that it applies to PC13 and PC14.

Refer to attached submission.

Attached Documents

File
J16644 Ceres PC13 and PC14 Submission FINAL 20230508

8 May 2023

Our Reference: J16644

Mark Stevenson
Christchurch City Council
c/o Engagement Team
Email: engagement@ccc.govt.nz

Dear Mark,

**SUBMISSION ON A NOTIFIED PROPOSAL FOR A POLICY STATEMENT OR PLAN, CHANGE OR VARIATION
CLAUSE 6 OF SCHEDULE 1 AND VIA INTENSIFICATION PLANNING INSTRUMENT (IPI) IN ACCORDANCE WITH
SECTION 80F(1)(a), RESOURCE MANAGEMENT ACT 1991**

**SUBMISSION ON HERITAGE PLAN CHANGE (PC13) AND HOUSING AND BUSINESS CHOICE PLAN CHANGE
(PC14)**

Purpose of Submission

This letter is a submission on the Heritage Plan Change (“PC13”) and Housing and Business Choice Plan Change (“PC14”) proposed by the Christchurch City Council (“Council”) prepared by Planz Consultants Limited (“Planz”) on behalf of Ceres New Zealand, LLC (“Ceres”).

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

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

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

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

Submitters details

Submitter	Ceres New Zealand, LLC
Contact Name	Swaroop Gowda
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Submission

This submission has been prepared by following the Council's notification of PC13 and PC14 in relation to 25 Peterborough Street, Central City, Christchurch and 87-93 Victoria Street, Central City, Christchurch.

The location of 25 Peterborough Street is depicted in Figure 1. Under PC13 and PC14, 25 Peterborough Street is located within the City Centre Zone (Figure 2) and subject to the following overlays.

- Heritage Setting – Setting #281
- Heritage Item – Item #440 – Highly Significant
- Central City Building Height 32m Overlay
- Significant and other Trees - Significant Tree #274.

The location of 87-93 Victoria Street is depicted in Figure 1. Under PC13 and PC14, 87-93 Victoria Street is located within the City Centre Zone (Figure 2) and subject to the following overlays.

- Cathedral Square and Victoria Street Precinct
- Victoria Street Height
- Heritage Setting – Setting #296
- Heritage Item – Item #529 – Highly Significant
- Central City Building Height 45m Overlay



Figure 1 Location of 25 Peterborough Street within orange boundaries and 87-93 Victoria Street within red boundaries (Canterbury Maps)



Figure 2 PC13 and PC14 Zoning of 25 Peterborough Street and 87-93 Victoria Street (PC13 and PC14 GIS)

PC13

Chapter 9.3 Historic Heritage

Ceres **oppose** changes to the proposed Chapter 9.3 Historic Heritage (as notified on 17 March 2023) for the following reasons.

- Point 1. The proposed policies, rules, matters of discretion, and schedules do not reflect significantly damaged heritage buildings which are uneconomical to repair, restore, and/or reconstruct.
- Point 2. Resultant of deleting a rule and matters of discretion relating to buildings which sustained damage in the Canterbury earthquakes of 2010 and 2011, it is unclear how the several significantly damaged heritage buildings in Christchurch which remain in a state of disrepair will be managed from a planning perspective.
- Point 3. The retention of Significant Tree #274 impedes the redevelopment of 25 Peterborough Street and, in turn, the use / reuse of the property and building therein.

Point 1

There are several heritage buildings within the city which remain significantly damaged, derelict, and vacant (e.g., 25 Peterborough Street and 91-93 Victoria Street), albeit the city is approximately 12 years post the Canterbury earthquakes.

Policy 9.3.2.2.3 (as notified) seeks for heritage items to be managed in a way that provides for the ongoing use / adaptive reuse of heritage buildings in a manner that is sensitive to their heritage values while recognising the need for works to be undertaken to accommodate their long-term retention and use, and the associated engineering and financial factors. Additionally, this policy seeks to recognise the need for a flexible approach to heritage management, with particular regard to enabling repairs, restoration, and reconstruction, in a manner which is sensitive to the heritage values of the scheduled historic heritage.

However, repairing a significantly damaged heritage building will involve a large volume of reconstruction and restoration work meaning that the resultant building is more likely than not to be a replica, rather than the original heritage fabric. Considering this, short- and long-term financial factors (i.e., repair / reconstruction costs, rental yield, etc.) greatly influence the ongoing use / adaptive reuse of a significantly damaged heritage building. For example, if the cost to repair / reconstruct a significantly damaged heritage building outweighs the long-term financial return then it would be uneconomical to pursue redevelopment options. Consequentially, damaged heritage buildings may be left in a damaged and derelict state or demolished entirely.

Considering the above, this policy (as notified) does not fully recognise the great impact financial factors contribute to the commercial decision of repairing, restoring, and reconstructing a significantly damaged heritage building to foster its use / reuse. Notably, sensitivity towards financial factors seems to understate its influence.

Additionally, Rule 9.3.4.1.5 (NC1) (as notified) does not fully recognise / reflect the need to demolish a significantly damaged heritage building that would be uneconomical to repair, restore, or reconstruct. The Non-Complying Activity status seems excessive / onerous given the nature of the damage sustained by a highly significant heritage item, and cost to repair / reconstruct.

Considering the above, Ceres seek the following decisions:

- a. **Create** a schedule identifying significantly damaged heritage items which face significant challenges to their ongoing restoration and economic reuse. Given that 12 years have elapsed since the earthquakes, these buildings are well known and able to be readily distinguished from buildings that are habitable and occupied. The list is narrow, is likely to extend to no more than a dozen or so buildings, and could include the following: Victoria Mansions, Peterborough Centre, Harley Chambers (Cambridge Tce), Englefield House (Fitzgerald Ave), Empire Hotel (Norwich Quay), Daresbury (Daresbury Lane), and the Dux/ Student Union building at the Arts Centre.
- b. **Add** a focussed policy within Chapter 9.3 which better reflects and recognises significantly damaged heritage items (identified in the schedule created as part of point a above) which face significant challenges to their repair and reuse. It is artificial for the policy and rule framework to ignore the post-quake reality that there are a number of significantly damaged heritage items and to not provide any differentiation between how intact and badly damaged buildings are to be managed.
- c. **Add** a Restricted Discretionary Activity provision (RD9) to Rule 9.3.4.1.3 for the repair, restoration, reconstruction, or alteration of a heritage item identified in the schedule created as part of point a above. The Matters of Discretion applicable to this rule will be those detailed in point e below.
- d. **Add** a Restricted Discretionary Activity provision (RD10) to Rule 9.3.4.1.3 for the demolition of a heritage item identified in the schedule created as part of point a above. The Matters of Discretion applicable to this rule will be those detailed in point e below.
- e. **Add** a Matter of Discretion provision to Rule 9.3.6 relating to the provision of a heritage restoration assessment or a heritage demolition assessment (the latter being applicable if the heritage item is to be demolished); engineering and Quantity Surveying evidence; photographic records; and a deconstruction salvage plan.

Point 2

There are several heritage buildings within Christchurch which remain significantly damaged and vacant because of the various Canterbury earthquakes. The Operative Christchurch District Plan (“Operative Plan”) specifically provided Rules and Matters of Discretion relating to the upgrade, replacement, reconstruction, restoration, alteration, and relocation of a heritage item.

However, resultant of PC13, these Rules and Matters of Discretion are proposed to be deleted, or significantly altered so that the resultant effect is entirely different to that of the Operative Plan. This approach seems premature while there continue to be several significantly damaged heritage buildings within Christchurch.

Ceres seek the following decision:

- a. **Delete** the PC13 proposed changes to Rule 9.3.4.1.1 (P9) and proposed deletion of P11 and P12 and Matter of Discretion 9.3.6.1.

Point 3

As a consequence of earthquake damage, the heritage building at 25 Peterborough Street may require significant reconstruction (potentially including demolition works) to reuse the building and property. The Horizontal Elm established on the site, which is identified as being significant, is located behind the

existing building and its visibility from adjacent properties and public spaces is largely blocked by built form. The precise location of the Horizontal Elm will highly likely restrict / impede the reconstruction / redevelopment of the building and property by limiting layout and design options. However, resultant of removing the Horizontal Elm, more options may be available for the reuse of the property and building including the area located at the centre.

Ceres seek the following decision:

- a. **Remove** the Horizontal Elm (*Ulmus glabra Horizontalis*) tree located on 25 Peterborough Street (Significant Tree #274) from Appendix 9.4.7.1 Schedules of significant trees (Christchurch City and Banks Peninsula).
- b. **Remove** the Significant and other Trees overlay applied to 25 Peterborough Street and update Planning Map 32C and H10 accordingly.

PC14

Chapter 15 Commercial

Ceres **oppose** changes to the proposed Chapter 15 Commercial (as notified on 17 March 2023) for the following reasons.

- Point 4. There is ambiguity regarding the height standards / overlay applicable to the 25 Peterborough Street and 87-93 Victoria Street which, in turn, causes confusion and poor application of the provisions.
- Point 5. The height standards / overlay applicable to the 25 Peterborough Street and 87-93 Victoria Street, in conjunction with Standards 15.11.2.11, 15.11.2.12, 15.11.2.14, 15.11.2.15, and 15.11.2.16, are contrary to Policy 3 of the National Policy Statement on Urban Development 2020 (“NPS-UD”).
- Point 6. Policy 15.2.4.1.a.iii is contrary to Policy 3 of the NPS-UD

Point 4

With regards to building height standards applicable to 25 Peterborough Street, the following is noted.

- Pursuant to Standard 15.11.2.11.a.i of PC14, the maximum height of any building on the property is 90m, and the maximum height of the building base is 28m.
- Pursuant to Standard 15.11.2.11.a.vi of PC14, the maximum height of all buildings in the Central City Heritage Qualifying Matter and Precinct is 28m.
- Pursuant to Standard 15.11.2.12 of PC14, the maximum height of the road wall of any building on the property shall be ... for sites located on a street intersection, a maximum height of 28m for a maximum distance of 30m from the street corner.
 - 25 Peterborough Street comprises several unit titles with a Stratum in Freehold estate. In the case of strata titles, PC14 defines site as meaning the underlying certificate of title of the entire land immediately prior to subdivision. Considering this, 25 Peterborough Street is entirely located on a street intersection.
- As previously mentioned, 25 Peterborough Street is subject to the Central City Building Height 32m Overlay pursuant to PC14.

With regards to building height standards applicable to 87-93 Victoria Street, the following is noted.

- Pursuant to Standard 15.11.2.11.a.v of PC14, the maximum height of all buildings on the property (as its located within the Victoria Street Height Precinct) is 45m, and the maximum height of the building based is 28m.
- Pursuant to Standard 15.11.2.11.a.vi of PC14, the maximum height of all buildings in the Central City Heritage Qualifying Matter and Precinct is 28m.
- As previously mentioned, 87-93 Victoria Street is subject to the Central City Building Height 45m Overlay pursuant to PC14.

Notably, there is no link between Standards 15.11.2.11 and 15.11.2.12 of PC14 and the Central City Maximum Building Height Planning Map including its overlays.

Considering the above, the various height standards / overlays applicable to 25 Peterborough Street and 87-93 Victoria Street create confusion and will result in poor application due to the ambiguity.

Additionally, the various height standards / overlays are contrary to Policy 3 of the NPS-UD for the reasons detailed below. Specifically, the heights standards / overlays applicable to 25 Peterborough Street and 87-93 Victoria Street as notified do not maximise the benefits of intensification.

An appropriate maximum height of any building on 25 Peterborough Street and 87-93 Victoria Street would be 90m to enable an economical redevelopment of both properties and restoration of the heritage buildings therein.

Ceres seek the following decision:

- a. **Remove** the Central City Heritage Qualifying Matter and Precinct applied to 25 Peterborough Street and 87-93 Victoria Street and update the planning maps accordingly.
- b. **Remove** the Central City Building Height 32m Overlay from 25 Peterborough Street and update the Central City Maximum Building Height Planning Map accordingly.
- c. **Remove** the Central City Building Height 45m Overlay from 87-93 Victoria Street and update the Central City Maximum Building Height Planning Map accordingly.
- d. **Remove** 87-93 Victoria Street from the Victoria Street Height Precinct and update the planning maps accordingly.
- e. **Delete** Standard 15.11.2.12.
- f. **Add** an exemption to Standard 15.11.2.11 which states that clauses ii to vi of Standard 15.11.2.11.a do not apply to any site containing a significant heritage item.
- g. **Add** an exemption to Standard 15.11.2.12 which states that clause a of Standard 15.11.2.12 does not apply to any site containing a significant heritage item.
- h. **Add** an exemption to Standard 15.11.2.14 which states that clause a of Standard 15.11.2.14 does not apply to any site containing a significant heritage item.
- i. **Add** an exemption to Standard 15.11.2.15 which states that clause a of Standard 15.11.2.15 does not apply to any site containing a significant heritage item.
- j. **Add** an exemption to Standard 15.11.2.16 which states that clause a of Standard 15.11.2.16 does not apply to any site containing a significant heritage item.

Point 5

Policy 3 of the NPS-UD states “In relation to tier 1 urban environments, regional policy statements and district plans enable:

- a) in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; ...”

The various height standards of Standards 15.11.2.11 and 15.11.2.12 and building height overlays applicable to 25 Peterborough Street and 87-93 Victoria Street are detailed in Point 4 above.

With regards to density of urban form, the following standards of PC14 are relevant to both properties.

- Standard 15.11.2.1 (Building setback and continuity)
- Standard 15.11.2.3 (Sunlight and outlook for the street)
- Standard 15.11.2.9 (Sunlight and outlook at boundary with a residential zone)
- Standard 15.11.2.10 (Minimum setback from the boundary with a residential zone)
- Standard 15.11.2.14 (Building tower setbacks)
- Standard 15.11.2.15 (Maximum building tower dimension and building tower coverage)
- Standard 15.11.2.16 (Minimum building tower separation)

The tenets of the standards bullet pointed above will not be traversed. However, when these standards are applied to 25 Peterborough Street and 87-93 Victoria Street, in conjunction with the height standards and overlays, any redevelopment of these properties and buildings therein will be restricted and impeded in both its height and density options. Ceres engaged several experienced architectural firms to develop concept plans for 25 Peterborough Street to deliver a multi-storey apartment or hotel development. All proposed designs are considered to deliver high quality urban design outcomes, yet none of them would

comply with the 'podium and tower' typology which PC14 appears to seek and consider as being the only acceptable design solution.

Applying the height standards / overlays, in conjunction with the standards bullet pointed above to the redevelopment of small or unusually shaped land parcels (which are common through the city centre) will be extremely challenging.

Resultant of applying these standards / overlays, in most costs, the redevelopment of any city centre zone site (including 25 Peterborough Street and 87-93 Victoria Street) will result in a financial return significantly less than that achievable through the Operative Plan. Consequentially, it may be uneconomical to develop / redevelop many city centre sites including those occupied by significantly damaged buildings (which would be left in a state of disrepair / derelict) or those undeveloped and vacant.

Consequentially, Standards 15.11.2.1, 15.11.2.3, 15.11.2.9 to 15.11.2.12, and 15.11.2.14 to 15.11.2.16 and the building height overlays of PC14 do not maximise the benefits of intensification and, therefore, are contrary to Policy 3 of the NPS-UD.

Ceres seek the following decision:

- a. **Delete** Standards 15.11.2.11, 15.11.2.12, 15.11.2.14, 15.11.2.15, and 15.11.2.16

Point 6

Rule 15.11.1.1.c limits the permitted activities undertaken at 25 Peterborough Street to those detailed within Rules 15.11.1.1 (P13), (P14), and (P17) pursuant to PC14.

Rule 15.11.1.1 (P13) relates to residential activity with various activity specific standards.

Rule 15.11.1.1 (P14) relates to visitor accommodation with various activity specific standards.

Rule 15.11.1.1 (P17) states "the following activities in the Former Christchurch Teachers College building at 25 Peterborough Street:

- i. Retail activity
- ii. Commercial services
- iii. Entertainment activity
- iv. Gymnasium
- v. Education activity
- vi. Health care facility
- vii. Office
- viii. Art studios and workshops
- ix. Preschool"

Rule 15.11.1.1 (P17) of PC14 is a carryover from the Operative Plan, specifically Rule 15.10.1.1 (P17).

Rule 15.11.1.1 (P17) significantly impacts the redevelopment of 25 Peterborough Street and the building therein by limiting the land uses and associated scale that are permitted to operate from this property. As previously mentioned, repairing, reconstructing, and / or redeveloping 25 Peterborough Street and its significantly damaged heritage building will be at a great cost. This cost will be weighed against the long-term economic benefit of the work and, therefore, the use of 25 Peterborough Street needs to be maximised. This can be achieved by enabling appropriate land uses to operate from 25 Peterborough Street as permitted activities, without limiting their scale. Rules 15.11.1.1 (P1) to (P15) detail land uses anticipated within the City Centre Zone and Ceres consider these same uses and associated scales to be appropriate to operate from 25 Peterborough Street.

Rule 15.10.1.1 (P17) of the Operative Plan was largely proposed by Ceres in their submission on the Christchurch District Plan 2015. However, since the 2015 submission, Ceres have a greater awareness of the significant scope of works and associated cost to repair, restore, or reconstruct 25 Peterborough Street. To balance those costs, Ceres need to be able to maximise the built form and land use opportunities available for 25 Peterborough Street. The Section 32 Evaluation Report for the Commercial Sub-Chapters and supporting documentation does not provide any reasoning for the retention of Rule 15.11.1.1 (P17) of PC14. Therefore, it does not seem sensible to restrict the land uses or control land uses that operate from 25 Peterborough Street any differently to the wider City Centre Zone. Hence, Rule 15.11.1.1 (P17) of PC14 should be deleted as it does not foster the restoration / redevelopment of 25 Peterborough from an economical / financial perspective.

Ceres seek the following decision:

- a. **Delete** Rule 15.11.1.1.c
- b. **Delete** Rule 15.11.1.1 (P17)
- c. **Retain** activity specific standard b of Rules 15.11.1.1 (P13) and (P14).

Point 7

Policy 15.2.4.1 states:

- a. Provide for development of a significant scale and form massing that reinforces the City's distinctive sense of place and a legible urban form by: ...
 - iii. limiting building height along Victoria Street where taller buildings are inappropriate due to the potential impact on legibility of the city centre form and dominance impacts on adjoining residential neighbourhoods.

For the reasons detailed within point 5 above, tenet iii of Policy 15.2.4.1.a is contrary to Policy 3 of the NPS-UD as limiting building heights along Victoria Street does not maximise the benefit of intensification.

The scale and massing of development within the City Centre Zone is controlled through the standards. The various relevant standards ensure that building heights are limited to that appropriate for the wider city centre form and its legibility, as well as adjoining residential neighbourhoods. Therefore, tenet iii of Policy 15.2.4.1.a is unnecessary.

Ceres seek the following decision:

- a. **Delete** Rule 15.2.4.1.a.iii.

Summary

Ceres generally support PC13 and PC14 on the basis that the modifications detailed above are adopted.

Yours faithfully

PLANZ CONSULTANTS LTD



Terri Winder

Consultant Planner

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Email: terri@planzconsultants.co.nz

8 May 2023

Our Reference: J16644

Mark Stevenson
Christchurch City Council
c/o Engagement Team
Email: engagement@ccc.govt.nz

Dear Mark,

**SUBMISSION ON A NOTIFIED PROPOSAL FOR A POLICY STATEMENT OR PLAN, CHANGE OR VARIATION
CLAUSE 6 OF SCHEDULE 1 AND VIA INTENSIFICATION PLANNING INSTRUMENT (IPI) IN ACCORDANCE WITH
SECTION 80F(1)(a), RESOURCE MANAGEMENT ACT 1991**

**SUBMISSION ON HERITAGE PLAN CHANGE (PC13) AND HOUSING AND BUSINESS CHOICE PLAN CHANGE
(PC14)**

Purpose of Submission

This letter is a submission on the Heritage Plan Change (“PC13”) and Housing and Business Choice Plan Change (“PC14”) proposed by the Christchurch City Council (“Council”) prepared by Planz Consultants Limited (“Planz”) on behalf of Ceres New Zealand, LLC (“Ceres”).

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

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

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- Heritage Setting – Setting #281
- Heritage Item – Item #440 – Highly Significant
- Central City Building Height 32m Overlay
- Significant and other Trees - Significant Tree #274.

The location of 87-93 Victoria Street is depicted in Figure 1. Under PC13 and PC14, 87-93 Victoria Street is located within the City Centre Zone (Figure 2) and subject to the following overlays.

- Cathedral Square and Victoria Street Precinct
- Victoria Street Height
- Heritage Setting – Setting #296
- Heritage Item – Item #529 – Highly Significant
- Central City Building Height 45m Overlay



Figure 1 Location of 25 Peterborough Street within orange boundaries and 87-93 Victoria Street within red boundaries (Canterbury Maps)



Figure 2 PC13 and PC14 Zoning of 25 Peterborough Street and 87-93 Victoria Street (PC13 and PC14 GIS)

PC13

Chapter 9.3 Historic Heritage

Ceres **oppose** changes to the proposed Chapter 9.3 Historic Heritage (as notified on 17 March 2023) for the following reasons.

- Point 1. The proposed policies, rules, matters of discretion, and schedules do not reflect significantly damaged heritage buildings which are uneconomical to repair, restore, and/or reconstruct.
- Point 2. Resultant of deleting a rule and matters of discretion relating to buildings which sustained damage in the Canterbury earthquakes of 2010 and 2011, it is unclear how the several significantly damaged heritage buildings in Christchurch which remain in a state of disrepair will be managed from a planning perspective.
- Point 3. The retention of Significant Tree #274 impedes the redevelopment of 25 Peterborough Street and, in turn, the use / reuse of the property and building therein.

Point 1

There are several heritage buildings within the city which remain significantly damaged, derelict, and vacant (e.g., 25 Peterborough Street and 91-93 Victoria Street), albeit the city is approximately 12 years post the Canterbury earthquakes.

Policy 9.3.2.2.3 (as notified) seeks for heritage items to be managed in a way that provides for the ongoing use / adaptive reuse of heritage buildings in a manner that is sensitive to their heritage values while recognising the need for works to be undertaken to accommodate their long-term retention and use, and the associated engineering and financial factors. Additionally, this policy seeks to recognise the need for a flexible approach to heritage management, with particular regard to enabling repairs, restoration, and reconstruction, in a manner which is sensitive to the heritage values of the scheduled historic heritage.

However, repairing a significantly damaged heritage building will involve a large volume of reconstruction and restoration work meaning that the resultant building is more likely than not to be a replica, rather than the original heritage fabric. Considering this, short- and long-term financial factors (i.e., repair / reconstruction costs, rental yield, etc.) greatly influence the ongoing use / adaptive reuse of a significantly damaged heritage building. For example, if the cost to repair / reconstruct a significantly damaged heritage building outweighs the long-term financial return then it would be uneconomical to pursue redevelopment options. Consequentially, damaged heritage buildings may be left in a damaged and derelict state or demolished entirely.

Considering the above, this policy (as notified) does not fully recognise the great impact financial factors contribute to the commercial decision of repairing, restoring, and reconstructing a significantly damaged heritage building to foster its use / reuse. Notably, sensitivity towards financial factors seems to understate its influence.

Additionally, Rule 9.3.4.1.5 (NC1) (as notified) does not fully recognise / reflect the need to demolish a significantly damaged heritage building that would be uneconomical to repair, restore, or reconstruct. The Non-Complying Activity status seems excessive / onerous given the nature of the damage sustained by a highly significant heritage item, and cost to repair / reconstruct.

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- a. **Create** a schedule identifying significantly damaged heritage items which face significant challenges to their ongoing restoration and economic reuse. Given that 12 years have elapsed since the earthquakes, these buildings are well known and able to be readily distinguished from buildings that are habitable and occupied. The list is narrow, is likely to extend to no more than a dozen or so buildings, and could include the following: Victoria Mansions, Peterborough Centre, Harley Chambers (Cambridge Tce), Englefield House (Fitzgerald Ave), Empire Hotel (Norwich Quay), Daresbury (Daresbury Lane), and the Dux/ Student Union building at the Arts Centre.
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- e. **Add** a Matter of Discretion provision to Rule 9.3.6 relating to the provision of a heritage restoration assessment or a heritage demolition assessment (the latter being applicable if the heritage item is to be demolished); engineering and Quantity Surveying evidence; photographic records; and a deconstruction salvage plan.

Point 2

There are several heritage buildings within Christchurch which remain significantly damaged and vacant because of the various Canterbury earthquakes. The Operative Christchurch District Plan (“Operative Plan”) specifically provided Rules and Matters of Discretion relating to the upgrade, replacement, reconstruction, restoration, alteration, and relocation of a heritage item.

However, resultant of PC13, these Rules and Matters of Discretion are proposed to be deleted, or significantly altered so that the resultant effect is entirely different to that of the Operative Plan. This approach seems premature while there continue to be several significantly damaged heritage buildings within Christchurch.

Ceres seek the following decision:

- a. **Delete** the PC13 proposed changes to Rule 9.3.4.1.1 (P9) and proposed deletion of P11 and P12 and Matter of Discretion 9.3.6.1.

Point 3

As a consequence of earthquake damage, the heritage building at 25 Peterborough Street may require significant reconstruction (potentially including demolition works) to reuse the building and property. The Horizontal Elm established on the site, which is identified as being significant, is located behind the

existing building and its visibility from adjacent properties and public spaces is largely blocked by built form. The precise location of the Horizontal Elm will highly likely restrict / impede the reconstruction / redevelopment of the building and property by limiting layout and design options. However, resultant of removing the Horizontal Elm, more options may be available for the reuse of the property and building including the area located at the centre.

Ceres seek the following decision:

- a. **Remove** the Horizontal Elm (*Ulmus glabra Horizontalis*) tree located on 25 Peterborough Street (Significant Tree #274) from Appendix 9.4.7.1 Schedules of significant trees (Christchurch City and Banks Peninsula).
- b. **Remove** the Significant and other Trees overlay applied to 25 Peterborough Street and update Planning Map 32C and H10 accordingly.

PC14

Chapter 15 Commercial

Ceres **oppose** changes to the proposed Chapter 15 Commercial (as notified on 17 March 2023) for the following reasons.

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- Point 5. The height standards / overlay applicable to the 25 Peterborough Street and 87-93 Victoria Street, in conjunction with Standards 15.11.2.11, 15.11.2.12, 15.11.2.14, 15.11.2.15, and 15.11.2.16, are contrary to Policy 3 of the National Policy Statement on Urban Development 2020 (“NPS-UD”).
- Point 6. Policy 15.2.4.1.a.iii is contrary to Policy 3 of the NPS-UD

Point 4

With regards to building height standards applicable to 25 Peterborough Street, the following is noted.

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- Pursuant to Standard 15.11.2.12 of PC14, the maximum height of the road wall of any building on the property shall be ... for sites located on a street intersection, a maximum height of 28m for a maximum distance of 30m from the street corner.
 - 25 Peterborough Street comprises several unit titles with a Stratum in Freehold estate. In the case of strata titles, PC14 defines site as meaning the underlying certificate of title of the entire land immediately prior to subdivision. Considering this, 25 Peterborough Street is entirely located on a street intersection.
- As previously mentioned, 25 Peterborough Street is subject to the Central City Building Height 32m Overlay pursuant to PC14.

With regards to building height standards applicable to 87-93 Victoria Street, the following is noted.

- Pursuant to Standard 15.11.2.11.a.v of PC14, the maximum height of all buildings on the property (as its located within the Victoria Street Height Precinct) is 45m, and the maximum height of the building based is 28m.
- Pursuant to Standard 15.11.2.11.a.vi of PC14, the maximum height of all buildings in the Central City Heritage Qualifying Matter and Precinct is 28m.
- As previously mentioned, 87-93 Victoria Street is subject to the Central City Building Height 45m Overlay pursuant to PC14.

Notably, there is no link between Standards 15.11.2.11 and 15.11.2.12 of PC14 and the Central City Maximum Building Height Planning Map including its overlays.

Considering the above, the various height standards / overlays applicable to 25 Peterborough Street and 87-93 Victoria Street create confusion and will result in poor application due to the ambiguity.

Additionally, the various height standards / overlays are contrary to Policy 3 of the NPS-UD for the reasons detailed below. Specifically, the heights standards / overlays applicable to 25 Peterborough Street and 87-93 Victoria Street as notified do not maximise the benefits of intensification.

An appropriate maximum height of any building on 25 Peterborough Street and 87-93 Victoria Street would be 90m to enable an economical redevelopment of both properties and restoration of the heritage buildings therein.

Ceres seek the following decision:

- a. **Remove** the Central City Heritage Qualifying Matter and Precinct applied to 25 Peterborough Street and 87-93 Victoria Street and update the planning maps accordingly.
- b. **Remove** the Central City Building Height 32m Overlay from 25 Peterborough Street and update the Central City Maximum Building Height Planning Map accordingly.
- c. **Remove** the Central City Building Height 45m Overlay from 87-93 Victoria Street and update the Central City Maximum Building Height Planning Map accordingly.
- d. **Remove** 87-93 Victoria Street from the Victoria Street Height Precinct and update the planning maps accordingly.
- e. **Delete** Standard 15.11.2.12.
- f. **Add** an exemption to Standard 15.11.2.11 which states that clauses ii to vi of Standard 15.11.2.11.a do not apply to any site containing a significant heritage item.
- g. **Add** an exemption to Standard 15.11.2.12 which states that clause a of Standard 15.11.2.12 does not apply to any site containing a significant heritage item.
- h. **Add** an exemption to Standard 15.11.2.14 which states that clause a of Standard 15.11.2.14 does not apply to any site containing a significant heritage item.
- i. **Add** an exemption to Standard 15.11.2.15 which states that clause a of Standard 15.11.2.15 does not apply to any site containing a significant heritage item.
- j. **Add** an exemption to Standard 15.11.2.16 which states that clause a of Standard 15.11.2.16 does not apply to any site containing a significant heritage item.

Point 5

Policy 3 of the NPS-UD states “In relation to tier 1 urban environments, regional policy statements and district plans enable:

- a) in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; ...”

The various height standards of Standards 15.11.2.11 and 15.11.2.12 and building height overlays applicable to 25 Peterborough Street and 87-93 Victoria Street are detailed in Point 4 above.

With regards to density of urban form, the following standards of PC14 are relevant to both properties.

- Standard 15.11.2.1 (Building setback and continuity)
- Standard 15.11.2.3 (Sunlight and outlook for the street)
- Standard 15.11.2.9 (Sunlight and outlook at boundary with a residential zone)
- Standard 15.11.2.10 (Minimum setback from the boundary with a residential zone)
- Standard 15.11.2.14 (Building tower setbacks)
- Standard 15.11.2.15 (Maximum building tower dimension and building tower coverage)
- Standard 15.11.2.16 (Minimum building tower separation)

The tenets of the standards bullet pointed above will not be traversed. However, when these standards are applied to 25 Peterborough Street and 87-93 Victoria Street, in conjunction with the height standards and overlays, any redevelopment of these properties and buildings therein will be restricted and impeded in both its height and density options. Ceres engaged several experienced architectural firms to develop concept plans for 25 Peterborough Street to deliver a multi-storey apartment or hotel development. All proposed designs are considered to deliver high quality urban design outcomes, yet none of them would

comply with the 'podium and tower' typology which PC14 appears to seek and consider as being the only acceptable design solution.

Applying the height standards / overlays, in conjunction with the standards bullet pointed above to the redevelopment of small or unusually shaped land parcels (which are common through the city centre) will be extremely challenging.

Resultant of applying these standards / overlays, in most costs, the redevelopment of any city centre zone site (including 25 Peterborough Street and 87-93 Victoria Street) will result in a financial return significantly less than that achievable through the Operative Plan. Consequentially, it may be uneconomical to develop / redevelop many city centre sites including those occupied by significantly damaged buildings (which would be left in a state of disrepair / derelict) or those undeveloped and vacant.

Consequentially, Standards 15.11.2.1, 15.11.2.3, 15.11.2.9 to 15.11.2.12, and 15.11.2.14 to 15.11.2.16 and the building height overlays of PC14 do not maximise the benefits of intensification and, therefore, are contrary to Policy 3 of the NPS-UD.

Ceres seek the following decision:

- a. **Delete** Standards 15.11.2.11, 15.11.2.12, 15.11.2.14, 15.11.2.15, and 15.11.2.16

Point 6

Rule 15.11.1.1.c limits the permitted activities undertaken at 25 Peterborough Street to those detailed within Rules 15.11.1.1 (P13), (P14), and (P17) pursuant to PC14.

Rule 15.11.1.1 (P13) relates to residential activity with various activity specific standards.

Rule 15.11.1.1 (P14) relates to visitor accommodation with various activity specific standards.

Rule 15.11.1.1 (P17) states "the following activities in the Former Christchurch Teachers College building at 25 Peterborough Street:

- i. Retail activity
- ii. Commercial services
- iii. Entertainment activity
- iv. Gymnasium
- v. Education activity
- vi. Health care facility
- vii. Office
- viii. Art studios and workshops
- ix. Preschool"

Rule 15.11.1.1 (P17) of PC14 is a carryover from the Operative Plan, specifically Rule 15.10.1.1 (P17).

Rule 15.11.1.1 (P17) significantly impacts the redevelopment of 25 Peterborough Street and the building therein by limiting the land uses and associated scale that are permitted to operate from this property. As previously mentioned, repairing, reconstructing, and / or redeveloping 25 Peterborough Street and its significantly damaged heritage building will be at a great cost. This cost will be weighed against the long-term economic benefit of the work and, therefore, the use of 25 Peterborough Street needs to be maximised. This can be achieved by enabling appropriate land uses to operate from 25 Peterborough Street as permitted activities, without limiting their scale. Rules 15.11.1.1 (P1) to (P15) detail land uses anticipated within the City Centre Zone and Ceres consider these same uses and associated scales to be appropriate to operate from 25 Peterborough Street.

Rule 15.10.1.1 (P17) of the Operative Plan was largely proposed by Ceres in their submission on the Christchurch District Plan 2015. However, since the 2015 submission, Ceres have a greater awareness of the significant scope of works and associated cost to repair, restore, or reconstruct 25 Peterborough Street. To balance those costs, Ceres need to be able to maximise the built form and land use opportunities available for 25 Peterborough Street. The Section 32 Evaluation Report for the Commercial Sub-Chapters and supporting documentation does not provide any reasoning for the retention of Rule 15.11.1.1 (P17) of PC14. Therefore, it does not seem sensible to restrict the land uses or control land uses that operate from 25 Peterborough Street any differently to the wider City Centre Zone. Hence, Rule 15.11.1.1 (P17) of PC14 should be deleted as it does not foster the restoration / redevelopment of 25 Peterborough from an economical / financial perspective.

Ceres seek the following decision:

- a. **Delete** Rule 15.11.1.1.c
- b. **Delete** Rule 15.11.1.1 (P17)
- c. **Retain** activity specific standard b of Rules 15.11.1.1 (P13) and (P14).

Point 7

Policy 15.2.4.1 states:

- a. Provide for development of a significant scale and form massing that reinforces the City's distinctive sense of place and a legible urban form by: ...
 - iii. limiting building height along Victoria Street where taller buildings are inappropriate due to the potential impact on legibility of the city centre form and dominance impacts on adjoining residential neighbourhoods.

For the reasons detailed within point 5 above, tenet iii of Policy 15.2.4.1.a is contrary to Policy 3 of the NPS-UD as limiting building heights along Victoria Street does not maximise the benefit of intensification.

The scale and massing of development within the City Centre Zone is controlled through the standards. The various relevant standards ensure that building heights are limited to that appropriate for the wider city centre form and its legibility, as well as adjoining residential neighbourhoods. Therefore, tenet iii of Policy 15.2.4.1.a is unnecessary.

Ceres seek the following decision:

- a. **Delete** Rule 15.2.4.1.a.iii.

Summary

Ceres generally support PC13 and PC14 on the basis that the modifications detailed above are adopted.

Yours faithfully

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