

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 08/05/2023

**First name:** Sarah **Last name:** Smith

**On behalf of:**

**Postal address:** 372 Pettigrews Road, RD 3

**Suburb:**

**City:** Akaroa

**Country:** New Zealand

**Postcode:** 7583

**Daytime Phone:** 0211507993

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

Chapter 9 Natural and Cultural Heritage **Points:** 051.1

- 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***

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

**My submission is that**

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

Chapter 10 Designations and Heritage Orders **Points:** 051.2

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

**My submission is that**

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

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Attached Documents

File
No records to display.

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

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

**Postal address:** PO Box 13560  
**Suburb:**  
**City:** Christchurch  
**Country:** New Zealand  
**Postcode:** 8140

**Daytime Phone:** 0278483457

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

Chapter 9 Natural and Cultural Heritage **Points:** 052.1

- 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***

- 1- Clarify whether Medium or High Density Zone is applicable to 288 Oxford Terrace site and all associated lots.
- 2- That Chester Street East from Madras Street to Fitzgerald Avenue is included in the proposed Residential Heritage Area.
- 3- As the sentence stands at the moment, it reads that a High Density Zone would be the buffer. As this does not make any sense, we suspect that the wording needs clarification.  
That the Plan Change 13 defines a buffer for RHA's, and how a buffer would be given effect.
- 4- To publicly notify a resource consent for any development on 94-96 Chester Street East.

### My submission is that

### 1 Reference the interactive map for 288 Oxford Terrace

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

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

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

### 2 Chester Street East/Dawson Street Residential Heritage Area

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

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

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

### 3 Introduction of a buffer for Residential Heritage Areas

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

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

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

### 4 Properties of interest to Oxford Terrace Baptist Church

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

Our submission is: The possible development of this site, if not done sympathetically and in character with 98-



100 Chester Street East and the four other heritage buildings, will have a significant detrimental effect on the collective heritage and amenity values of this part of Chester Street East.

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

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Attached Documents

File
No records to display.

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 10/05/2023

**First name:** JONO **Last name:** DE WIT

**On behalf of:**

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**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:

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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

Chapter 14 Residential **Points:** 053.1

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

**My submission is that**

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

Attached Documents

File
No records to display.

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 10/05/2023

**First name:** Joanne **Last name:** Nikolaou

**On behalf of:**

**Postal address:** 50 Fairview Street

**Suburb:** Somerfield

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8024

**Daytime Phone:** 0274045981

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:

power point presentation if possible

### Consultation Document Submissions

Chapter 10 Designations and Heritage Orders **Points:** 054.1

- 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***

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

See supporting report for extent of area and supporting evidence.

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

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

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

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

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

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

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

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

#### **My submission is that**

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

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

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- B. Only 5% (or 4 Properties) contemporary homes without any heritage value.
- C. 1 extraordinary example of Art Deco Architecture.

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

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#### Attached Documents

File
Cashmere View Somerfield Character Area Report

# Cashmere View Somerfield Area 'CSA'

## Heritage and Character Assessment

Report April 2023

Ashgrove Terrace

Fairview Street

Cashmere View Street

Rose Street



## Contents

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

## Author

Joanne Nikolaou

Bachelor of Architectural Studies University of Auckland

Bachelor of Architecture University of Auckland

This report has not been peer reviewed

April 2023

## List of abbreviations

Cashmere View Somerfield Area: CSA

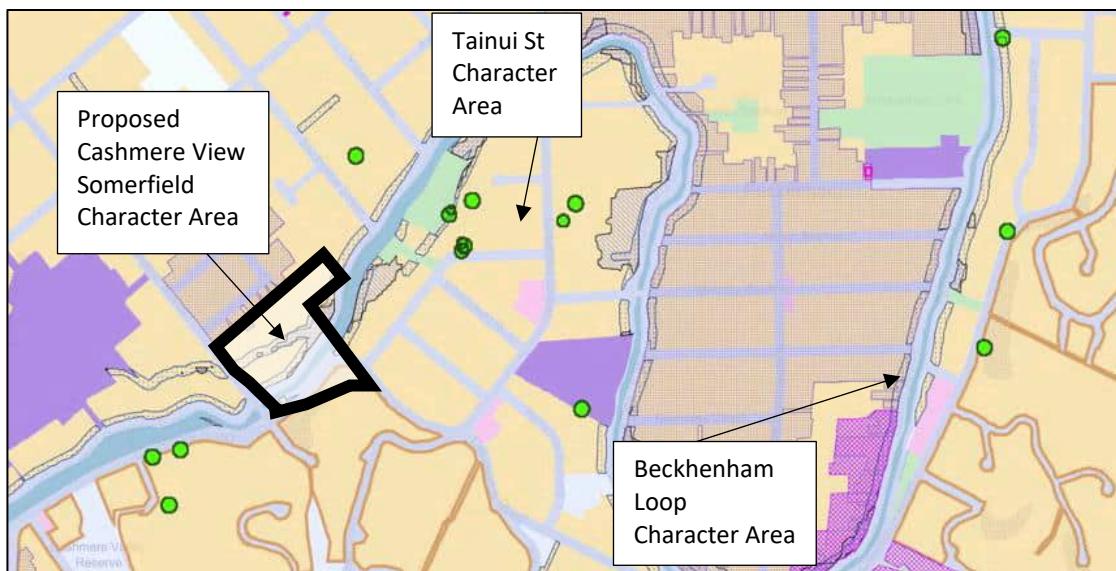
Christchurch City Council: CCC



## Executive Summary

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

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



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

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

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

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

## What is historic heritage?

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

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

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

## Character Areas and Historic values

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

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

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

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

## Desktop Analysis

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

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

## Character Elements

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

## On-Site Assessment

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

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



## Cashmere View Somerfield Area Description

### Streetscape

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

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

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

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

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



### Setback from Street

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

### Boundary Treatment – Planting / Fencing

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

### Landscape Characteristics

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

### Built Form Elements Dwelling Style / Era

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

### Relationship to Street / Visual Connectivity

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



## CSA Visual Inspection Heritage Examples



### 113 Ashgrove Terrace

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



### 10 Fairview Street

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



### 7 Fairview Street

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





#### 15 Fairview Street

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



#### Fairview Street Scape

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



#### 37 Fairview Street

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



#### 112 Rose Street

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





#### Cashmere View Street Scape

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



#### Cashmere View Street Bungalows

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



#### 14 Cashmere View Street

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



#### 20 Cashmere View Street

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



## CSA Categorisation of Properties



Map Legend Mapped as at April 2023

Dates are estimations based historical maps and architectural features

Street Scape Quality High

1925 - 1930 Bungalow (30%)

1930 - 1945 Bungalow (59%)

1950s + Art Deco (1%)

New Build Bungalow Features (5%)

New Build Contemporary (5%)

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

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

## Map and Archive Information

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

Press Issue 19104 13 September 1927

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### NAMES OF STREETS.

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#### CITY COUNCIL DISCUSSION.

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

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

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

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

The Mayor: It was done to oblige one man.

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

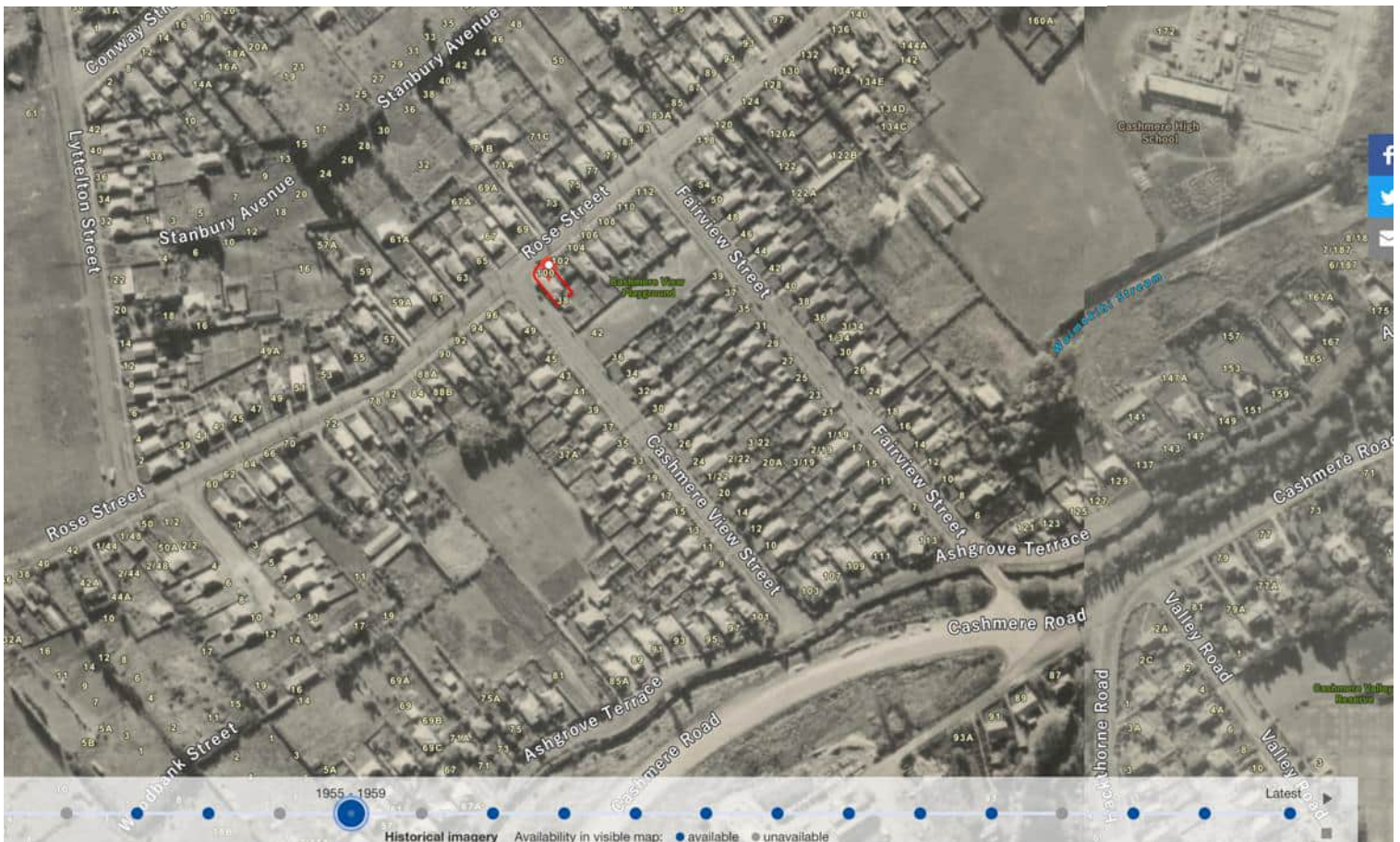
This course was agreed to.





Aerial Photograph 1927  
Canterbury Maps April 2023

Aerial Photograph 1955  
Canterbury Maps April 2023







Aerial Photograph 1958  
Canterbury Maps April 2023

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 11/05/2023

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

**Organisation:** The Rannerdale Trust

**On behalf of:**

**Postal address:** PO Box 35

**Suburb:**

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8140

**Daytime Phone:** 021 568 335

I could not

Gain an advantage in trade competition through this submission

I am not

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

a. adversely affects the environment, and

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

Note to person making submission:

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

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

Yes

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

### Attached Documents

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

**Form 5**  
**Submission on notified proposal for policy statement or**  
**plan, change or variation**

Clause 6 of Schedule 1, Resource Management Act 1991

To: **Christchurch City Council**

Name of Submitter: **The Rannerdale Trust**

**Introduction**

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

**Specific provisions of the plan change that this submission relates to**

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

**Submission**

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

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

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

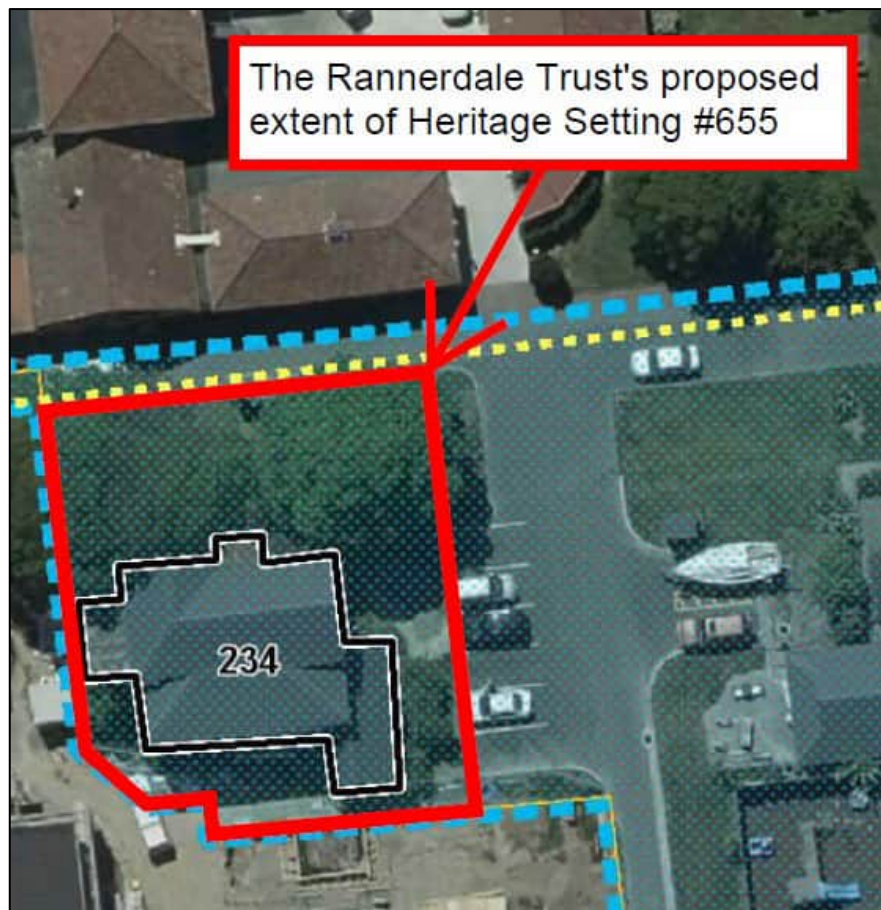
8. Amending PC13 as notified will:

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



### Relief Sought

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



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

### Other

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

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

**DATED** 10 May 2023

pp.  \_\_\_\_\_

The Rannerdale Trust

Encl: Attachment [A] Consent RMA20223600

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

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

# Attachment [A]

## Report / Decision on a Non-notified Subdivision Consent Application

Sections 95A / 95B and 104 and 104C

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

### The proposal

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

### Relevant rules and activity status

#### Christchurch District Plan

The site is zoned Residential Suburban

#### Land use rules

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

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

#### Subdivision rules

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

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

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

### National Environmental Standard

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

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

### Plan Change 14 Housing and Business Choice

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

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

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

<b>Effects on the environment and adversely affected persons [Sections 95D, 95E and 104(1)(a)]</b>
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### Subdivision

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

### Heritage

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

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

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

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



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

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

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

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

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

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

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



## Earthworks

Earthworks to create the rain garden and retaining wall were undertaken in 2017 after the District Plan rule requiring consent for earthworks within 5m of a scheduled heritage item came into effect (Sept 2016)<sup>1</sup>. No resource consent was obtained for the works. It is accepted that drainage issues on site needed to be addressed, however the present raingarden solution is incompatible with the heritage values of the house and setting. This has been addressed above. The earthworks will comply with all the other activity standards, including the volume and depth limitations. The raingarden is 0.55m deep based on the ECan consented design plans and substantially less than 20m<sup>3</sup> in volume.

The applicant has provided the following assessment:

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

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

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

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

## General Matters of Subdivision

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

## National Environmental Standard

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

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

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*The retaining wall included in the works is not classified as a building. It will be a maximum of approximately 0.5m high and 3m long (well less than 1.8m high and 6m<sup>2</sup> area), thereby meeting the retaining wall exemption in clause (f) in the exclusion list under the definition of building and no setback apply to the wall under the zoning rules.*

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

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

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

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

### **Conclusion**

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

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

### **Notification assessment [Sections 95A and 95B]**

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

#### **Public notification**

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

#### **Limited notification assessment**

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

#### **Conclusion on notification**

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

### **Other Section 104 matters**

The application is:

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



For completeness, I note that the District Plan gives effect to the relevant higher order planning documents referred to in s104(1)(b). The Plan was competently prepared and appropriately reflects the higher order provisions, so they do not need to be specifically addressed in this report<sup>2</sup>.

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

For completeness, I note that the District Plan gives effect to the relevant higher order planning documents referred to in s104(1)(b). The Plan was competently prepared and appropriately reflects the higher order provisions, so they do not need to be specifically addressed in this report<sup>3</sup>.

Taking guidance from the most recent case law<sup>4</sup>, the District Plan is considered to be the mechanism by which the purpose and principles of the Act are given effect to in the Christchurch District. It was competently prepared through an independent hearing and decision-making process in a manner that appropriately reflects the provisions of sections 5-8 of the Act. Proposed Plan Change 14 has commenced the implementation of the MDRS as required by the Act, and the objectives and policies proposed by the Plan Change and discussed above are intended to give effect to the National Policy Statement on Urban Development. As this site is within a qualifying matter area, the Plan change has signalled that intensification provisions of the MDRS are not considered appropriate on this site. The qualifying matter status is subject to challenge via submissions, but due to the early stage in the process I cannot give consideration to the MDRS in relation to this site.

## Section 106

### **s106 Consent authority may refuse subdivision consent in certain circumstances**

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

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

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

## Recommendations

### **LAND USE CONSENT**

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

<sup>2</sup> R J Davidson Family Trust v Marlborough District Council [2018] NZCA 316

<sup>3</sup> R J Davidson Family Trust v Marlborough District Council [2018] NZCA 316

<sup>4</sup> R J Davidson Family Trust v Marlborough District Council [2018] NZCA 316

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

### **SUBDIVISION CONSENT**

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

**1. Compliance with Application Information**

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

**2. Water Supply**

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

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

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

**3. Heritage**

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

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

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

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

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

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

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

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

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

#### 4. Earthworks

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

#### 5. Telecommunications and Energy Supply

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

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

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

#### 6. No Build Area

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

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

#### 7. Right of Way Easements (Private Ways)

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

#### 8. Service Easements

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

#### 8. Consent Notice

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

##### **No build area – Lot 3**

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

*Note: Council will prepare the Consent Notice.*

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

#### **Lapsing of this consent**

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

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

#### **Lapsing of s223 Certification**

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

### Your Rights of Objection

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

### Commencement of this consent

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

### Development Contributions

No development contributions are payable on this consent.

### Council Site Characteristics Information

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

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

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

### Right of Way

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

### Health of Land

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

### Heritage

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

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

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

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

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

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

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

**Date:** 30<sup>th</sup> March 2023

<b>Decision</b>
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That the above recommendations be adopted for the reasons outlined in the report.

**Delegated officer:**



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



Memorandum of Easement

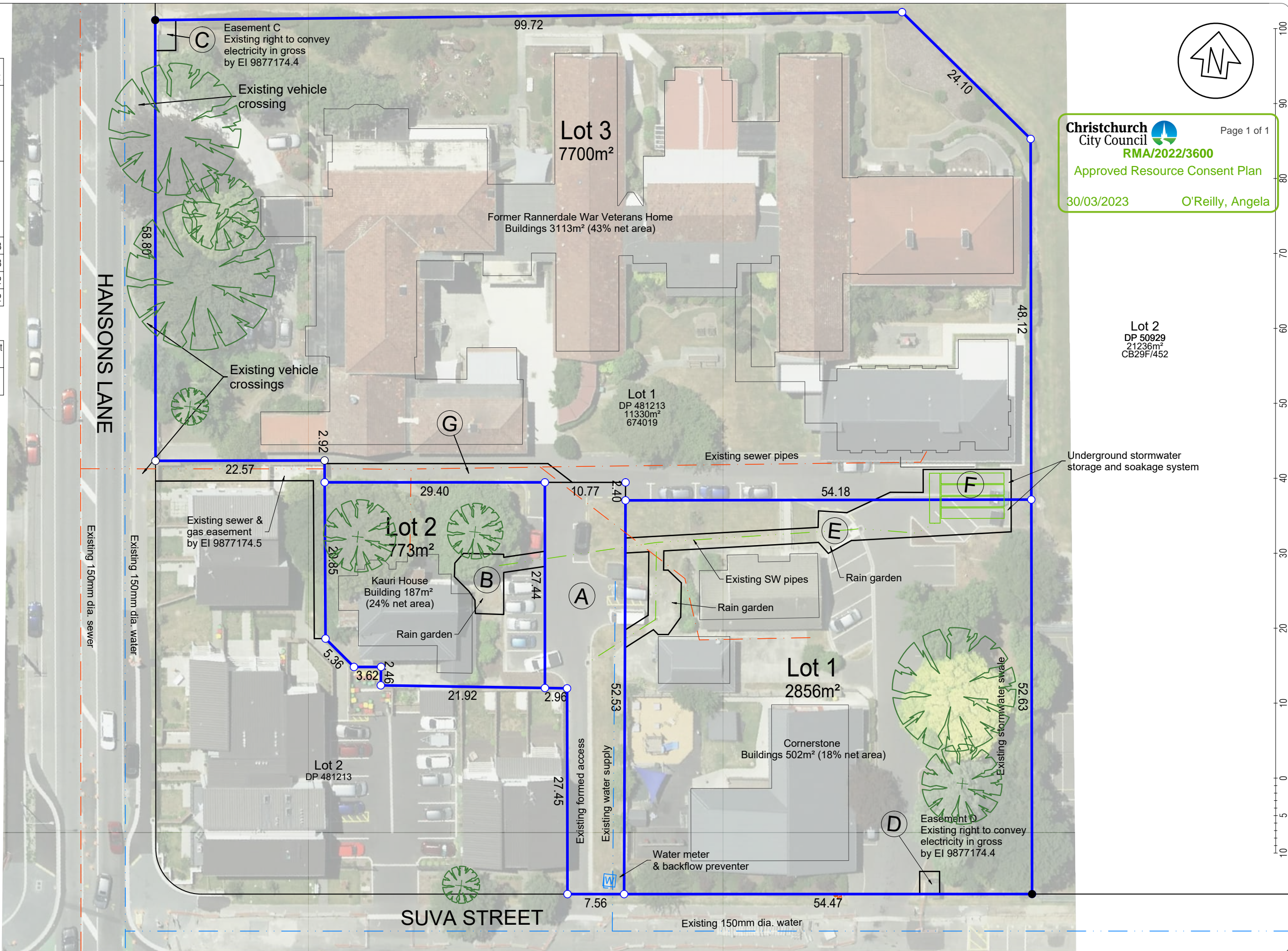
Nature	Servient Tenement		Dominant Tenement
	Lot	Shown As	
Right of way, Right to convey water, electric power & telecommunications, Right to drain water & sewage	Lot 3	A	Lot 2
Right to convey water, electric power & telecommunications, Right to drain water & sewage	Lot 3	A	Lot 1
Right to drain water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

Schedule of Existing Easements

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

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

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



Christchurch City Council  
 RMA/2022/3600  
 Approved Resource Consent Plan  
 30/03/2023 O'Reilly, Angela  
 Page 1 of 1

Lot 2  
 DP 50929  
 21236m²  
 CB29F/452

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

Notes:

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

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

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



## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 11/05/2023

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

**On behalf of:** Mitre Hotel Holdings Limited

**Postal address:** PO Box 35

**Suburb:**

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8140

**Daytime Phone:** 021 568 335

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

Mitre Hotel Plan Change 13 Submission - FINAL



**Form 5**  
**Submission on notified proposal for policy statement or**  
**plan, change or variation**  
 Clause 6 of Schedule 1, Resource Management Act 1991

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To: **Christchurch City Council**

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

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**Introduction**

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

**Specific provisions of the plan change that this submission relates to**

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

**Submission**

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

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

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

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


### Relief Sought

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

### Other

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

**DATED** 10 May 2023

pp.  \_\_\_\_\_

Mitre Hotel Holdings Limited

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

**Contact Person:** Anita Collie  
**Cell:** 021 568 335  
**E-mail:** [anita@townplanning.co.nz](mailto:anita@townplanning.co.nz)

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

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

**Postal address:** PO Box 73012, Orchard  
 Road  
**Suburb:**  
**City:** Christchurch  
**Country:** New Zealand  
**Postcode:** 8154

**Daytime Phone:** 03 9416203

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

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

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

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

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

Additional requirements for hearing:

### Consultation Document Submissions

Chapter 9 Natural and Cultural Heritage **Points:** 058.1

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

**My submission is that**

9.3.3 How to interpret and apply the rules

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

---

Chapter 13 Central City **Points:** 058.2

- 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***

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

**My submission is that**

App 13.2.6.1 and App 13.2.6.2

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

---

Chapter 15 Commercial **Points:** 058.3

- 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***

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

**My submission is that**

App 15.15.7 & 9.3.6.3 MOD

Incorrect name for Akaroa Design Panel

---

**Attached Documents**

File
No records to display.

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

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

**On behalf of:**

**Postal address:** 8 Aikmans Road  
**Suburb:** Merivale  
**City:** Christchurch  
**Country:** New Zealand  
**Postcode:** 8014

**Daytime Phone:** 64 27 215 0600

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:

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

### Consultation Document Submissions

Chapter 9 Natural and Cultural Heritage **Points:** 059.1

- 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**

Detailed submission in the attachment.

1. Retain the deletion of Heritage Item 453 from Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items as notified.

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

---

Planning Maps **Points:** 059.2

- 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*

**My submission is that**

3. Retain the deletion of Heritage Setting 183 from the Heritage Items and Settings Aerial Maps and Natural and Cultural Heritage Planning Map 30C as notified.

4. Amend Heritage Setting 684 as shown on the Heritage Items and Settings Aerial Maps and Natural and Cultural Heritage Planning Map 30C as shown in Figure 1 (attached).

5. Such further, alternative or consequential relief as may be necessary to fully give effect to this submission.

---

Attached Documents

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



## Form 5

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

*Clause 6 of Schedule 1, Resource Management Act 1991*

To the Christchurch City Council (“the Council”)

**Name of submitter:** Canterbury Jockey Club

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

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

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

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

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

**The Canterbury Jockey Club’s submission is:**

**Background: The Riccarton Park Racecourse and Canterbury Jockey Club**

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

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

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

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

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

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

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

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

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

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

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

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

### Statutory Context

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

### Canterbury Jockey Club’s submission

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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





*Photo 1: View looking north to the Tea House*



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



*Photo 3: The Tea House entrance*



*Photo 4: The Tea House view from front lawn*



*Photo 5: The Tea House view from front lawn*



*Photo 6: The Tea House view from front lawn*

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

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

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

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

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



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

**Date:** 12 May 2023

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

**Telephone:** +64 27 215 0600

**Postal address:** 8 Aikmans Road, Merivale, Christchurch 8014

**Contact person:** Ainsley McLeod

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 12/05/2023

**First name:** Elizabeth **Last name:** Harris

**On behalf of:**

**Postal address:** PO Box 35

**Suburb:**

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8140

**Daytime Phone:** 021 057 3762

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

I am not  
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 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

Wigram Lodge - Plan Change 13 Submission - FINAL



## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 12/05/2023

**First name:** Elizabeth **Last name:** Harris

**On behalf of:**

**Postal address:** PO Box 35

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:** 8140

**Daytime Phone:** 0210573762

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

### Attached Documents

File
Wigram Lodge - Plan Change 13 Submission - FINAL



**Form 5**  
**Submission on notified proposal for policy statement or**  
**plan, change or variation**

Clause 6 of Schedule 1, Resource Management Act 1991

---

To: **Christchurch City Council**

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

---

**Background**

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

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

### Introduction

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

### Specific provisions of the plan change that this submission relates to

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

### Submission

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

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

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

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

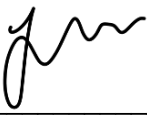
### Relief Sought

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

### Other

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

**DATED** 12 May 2023

pp.  \_\_\_\_\_

Elizabeth & John Harris

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

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

**Form 5**  
**Submission on notified proposal for policy statement or**  
**plan, change or variation**

Clause 6 of Schedule 1, Resource Management Act 1991

---

To: **Christchurch City Council**

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

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### Relief Sought

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  - (b) remove the Inner City West Residential Heritage Area overlay from the site and other sites on Cashel Street;
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### Other

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

**DATED** 12 May 2023

pp.  \_\_\_\_\_

Elizabeth & John Harris

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

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

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 12/05/2023

**First name:** Alice **Last name:** Burnett

**On behalf of:** Hughes Developments Limited

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Daytime Phone:** 379 0793

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

I am not  
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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.

Additional requirements for hearing:

### Consultation Document Submissions

Chapter 9 Natural and Cultural Heritage **Points:** 062.1

- 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 see attached*

**My submission is that**

see attached

---

Attached Documents

File
Submission to PC13 HDL



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

**TO:** Christchurch City Council  
[engagement@ccc.govt.nz](mailto:engagement@ccc.govt.nz)

**1. Submitter Details**

**Submitters name:** Hughes Developments Limited

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

**Contact person:** [alice.burnett@dls.co.nz](mailto:alice.burnett@dls.co.nz)

**Phone:** 03-379-0793

**2. Trade Competition:**

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

If Yes to above, then:

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

(a) adversely affects the environment; and

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

**3. Hearing options:**

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

Yes  No

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

Yes  No

#### 4. Submission Details

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

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

*Alice Burnett*

12 May 2023

Signature of person authorised to sign on behalf of submitter

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 12/05/2023

**First name:** Marie **Last name:** Byrne

**On behalf of:**

**Postal address:** 97A Olliviers Road

**Suburb:** Phillipstown

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8011

**Daytime Phone:** 0274716539

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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

Chapter 9 Natural and Cultural Heritage **Points:** 063.1

- 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***

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

**My submission is that**

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

---

## Attached Documents

File
No records to display.

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 12/05/2023

**First name:** Graham **Last name:** Robinson

**On behalf of:**

**Postal address:** 424 Selwyn Street

**Suburb:** Addington

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8024

**Daytime Phone:** 03 3793533

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 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

Chapter 9 Natural and Cultural Heritage **Points:** 065.1

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

**My submission is that**

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

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



Attached Documents

File
No records to display.

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 12/05/2023  
**First name:** Rachel **Last name:** Crawford  
**Organisation:** Richmond Residents and Business Association (We are Richmond)  
**On behalf of:** Richmond Residents and Business Association (We are Richmond)  
**Postal address:** PO Box 26097, North Avon  
**Suburb:**  
**City:** Christchurch  
**Country:** New Zealand  
**Postcode:** 8148  
  
**Daytime Phone:** 02102250944

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

Chapter 13 Central CityPoints: 066.1

- 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

**SUBMISSION FROM THE RICHMOND RESIDENTS' and BUSINESS ASSOCIATION, CHRISTCHURCH**

**Plan Change 13 – Proposed Heritage**

**Plan Change 14 – Housing and Business Choice**

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

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

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

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

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

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

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

---

#### Attached Documents

File
No records to display.

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 12/05/2023

**First name:** Catherine **Last name:** Elvidge

**On behalf of:**

**Postal address:** 11 Halton Street

**Suburb:** Strowan

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8052

**Daytime Phone:** 941-6463

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

Chapter 9 Natural and Cultural Heritage **Points:** 067.1

- 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***

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

Alternatively I seek that:

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



**My submission is that**

Refer attached submission

---

Chapter 9 Natural and Cultural Heritage **Points:** 067.2

- 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***

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

Alternatively I seek that:

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

**My submission is that**

Refer attached

---

Attached Documents

File
PC13 submission on Papanui War Memorial Avenues - C Elvidge

## Submission on Plan Change 13 – Heritage

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

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

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

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

### Trees

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

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

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

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

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

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

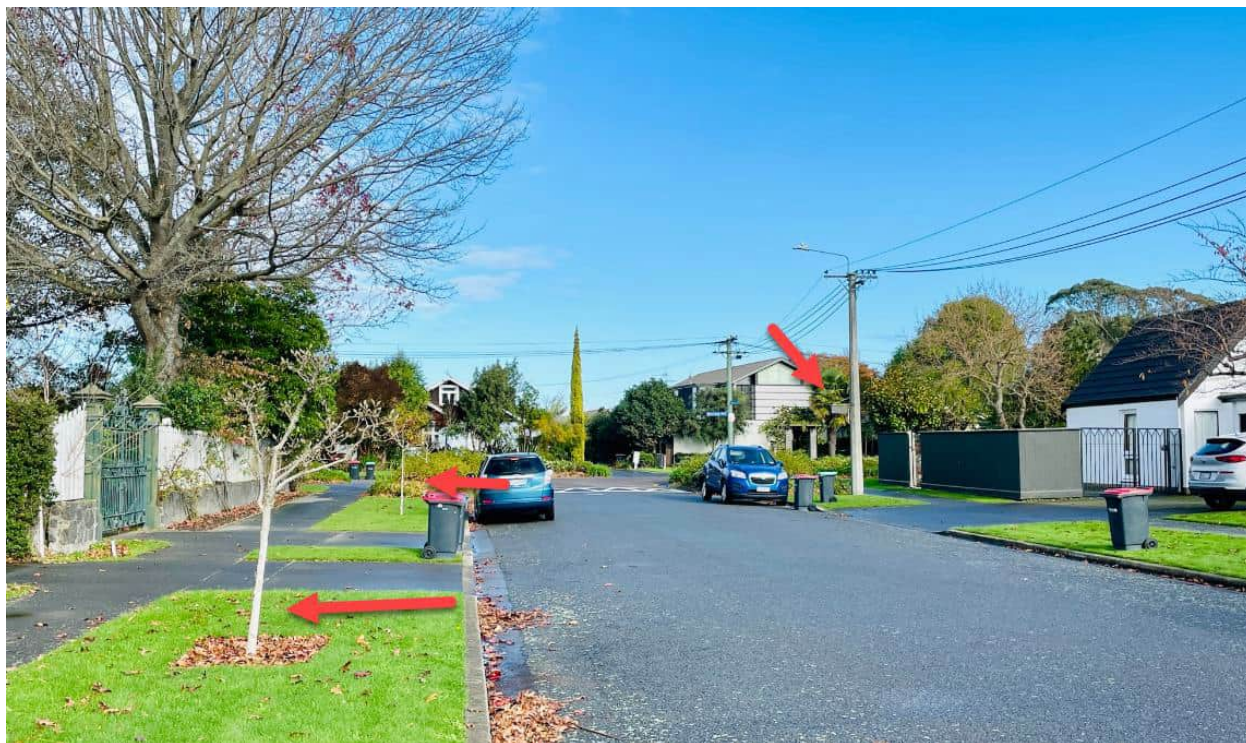


Existing streetscape – trees are difficult to see due to light conditions, but it shows that they are not a significant landscape feature within the streetscape.



### Plaques

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



Existing streetscape looking towards Harley Ave showing plaque and trees.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE  
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE  
HERITAGE ITEM NUMBER 1459  
PAPANUI WAR MEMORIAL AVENUES - ALPHA AVENUE,  
CLAREMONT AVENUE, CONDELL AVENUE, DORMER STREET,  
GAMBIA STREET, HALTON STREET, HARTLEY AVENUE, KENWYN  
AVENUE, LANSBURY AVENUE, NORFOLK STREET, PERRY STREET,  
SCOTSTON AVENUE, ST JAMES AVENUE, TILLMAN AVENUE,  
TOMES ROAD, WINDERMERE ROAD, CHRISTCHURCH**



Photo- Christchurch City Council heritage files

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

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

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

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



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

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

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

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

References – Christchurch City Council Heritage Files

REPORT DATED: 10 JUNE 2022

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 12/05/2023  
**First name:** Keri **Last name:** Whaitiri

**On behalf of:** Te Rito Trust & Malcolm  
 Hattaway

**Postal address:** 19 Exeter Street

**Suburb:**

**City:** Lyttelton

**Country:** New Zealand

**Postcode:** 8082

**Daytime Phone:** 0220152778

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

I am 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.

Additional requirements for hearing:

### Consultation Document Submissions

Chapter 9 Natural and Cultural Heritage **Points:** 069.1

- 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***

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

current provisions of the 'Residential Character Areas'.

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

#### **My submission is that**

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

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

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

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

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

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

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

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

---

#### Attached Documents

File
No records to display.

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 12/05/2023

**First name:** Danny **Last name:** Whiting

**On behalf of:**

**Postal address:** PO Box 365

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:** 8013

**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.

Additional requirements for hearing:

### Attached Documents

File
PC13 submission Danny Whiting

## Form 5

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

*Clause 6 of Schedule 1, Resource Management Act 1991*

**To** Christchurch City Council

**Name of submitter:** Danny Whiting (**D Whiting**)

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

**Signed** for and on behalf of Danny Whiting



---

pp. D Whiting  
12 May 2023

Address for service of submitter:

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



## ANNEXURE A

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

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

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

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

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

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 17/05/2023

**First name:** Richard **Last name:** Pebbles

**Organisation:** Pebbles Group Limited

**On behalf of:**

**Postal address:** PO Box 365

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:** 8013

**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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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

PC13 submission Pebbles Group Limited

## Form 5

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

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

**Signed** for and on behalf of Peebles Group Limited

---

pp. R Peebles  
12 May 2023

Address for service of submitter:

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

## ANNEXURE A

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

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

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

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



## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 17/05/2023

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

**On behalf of:** R & S Peeble

**Postal address:** PO Box 365

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:** 8013

#### 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.

Additional requirements for hearing:

#### Attached Documents

File
PC13 submission Richard and Suzanne Peebles

## Form 5

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

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

**Signed** for and on behalf of Richard and Suzanne Peebles

---

pp. R & S Peebles  
12 May 2023

Address for service of submitter:

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

## ANNEXURE A

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

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

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

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

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 12/05/2023  
**First name:** Richard **Last name:** Pebbles  
**Organisation:** 181 High Limited

**On behalf of:**

**Postal address:** PO Box 365

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:** 8013

**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.

Additional requirements for hearing:

### Attached Documents

File
PC13 submission 181 High Limited



## Form 5

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

*Clause 6 of Schedule 1, Resource Management Act 1991*

**To** Christchurch City Council

**Name of submitter:** 181 High Limited (**181 High**)

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

**Signed** for and on behalf of 181 High Limited



pp. R Peebles  
12 May 2023

Address for service of submitter:

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

## ANNEXURE A

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

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

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

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

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

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 12/05/2023

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

**On behalf of:**

**Postal address:** 120 governors bay teddington  
road

**Suburb:** Allandale

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8971

**Daytime Phone:** 0212068432

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

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

Note to person making submission:

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

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

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

### Attached Documents

File
Heather Bundy Email
Heritage Plan Change 13 Submission

**Jackson, Andrew**

---

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

Good Afternoon

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

Regards

David Bundy

Trustee Governors Bay Heritage Trust



Virus-free. [www.avg.com](http://www.avg.com)



Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

Gender:  Male  Female  Non-binary/another gender

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

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

\* Required information

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

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

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

Trade competition and adverse effects\* (select appropriate)

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

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

- (a) adversely affects the environment, and
- (b) does not relate to the trade competition or the effects of trade competition?  Yes  No

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

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

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

Joint submissions (Please tick this box if you agree)

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

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

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

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

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

Signature [Handwritten Signature]

Date 17<sup>th</sup> May 2023  
3:45 pm



Have your say

Heritage Plan Change 13

**Housing and Business Choice Plan Change 14**

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

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

Two heritage buildings to be scheduled in the district plan.

**My submission is that:\***

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

**I seek the following decision from the Council:\***

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

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

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

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

✗



## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 12/05/2023

**First name:** Diana **Last name:** Shand

**On behalf of:**

**Postal address:** PO Box 2306

**Suburb:**

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8140

**Daytime Phone:** 021471989

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

**Jackson, Andrew**

---

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

**Jackson, Andrew**

---

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

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

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

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

Diana

Diana Shand 021 471 989

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

Kia ora Diana,

Thanks for your feedback.

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

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

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

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

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

Ngā mihi,

**Aviva Cui**

**Engagement Assistant**


Communications and Engagement


Pronouns: she/her



03 941-6844 | 027 367 1828

 [Aviva.cui@ccc.govt.nz](mailto:Aviva.cui@ccc.govt.nz)

 Te Hononga Civic Offices, 53 Hereford Street, Christchurch

 PO Box 73016, Christchurch 8154

 [ccc.govt.nz](http://ccc.govt.nz)

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**Christchurch**  
City Council 



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

**Sent:** Friday, 12 May 2023 11:47 pm

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

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

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

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

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

**Christchurch**  
City Council 



Dinaa Shand  
Submission on Plan Change 13

I wish to be heard

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

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

### **I support the proposed Inner-City West Residential Heritage Area**

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

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

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

### **Alternatives to high rise and cramped-living densification:**

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

Strengthened heritage buildings that can be used for contemporary purposes.

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

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

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

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

### **There are other ways of increasing the housing supply**

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

### **Design controls are needed:**

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

### **Building heights**

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

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

### **Commercial drift undermines residential quality and the commercial district**

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

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

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

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

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

\*\*\*\*\*

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 12/05/2023

**First name:** Dorothy **Last name:** Lovell-Smith

**On behalf of:**

**Postal address:** 37 Amuri Street

**Suburb:** Hei Hei

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8042

**Daytime Phone:** 0210732114

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

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

Note to person making submission:

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

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

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

### Attached Documents

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



**Jackson, Andrew**

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

Hi

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

Thanks

Dot Lovell Smith

Personal details;

Name Dot Lovell-Smith

email;dotlsnz@gmail.com

daytime ph 03 9600545 or 0210732114

Address 37 Amuri St , Hei Hei, 8042

My submission;

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

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

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

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

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

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

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

future green space.

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

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

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

Increasing the population in Hornby is a no-brainer . We are lacking in many community facilites. It has taken 20 years of agitation to get the CCC to accept the idea of a need for a decent library and swimming pool to support the health and development of local children and start the build. Its still not finished and would probably prove to be inadequate for an increased population.

We dont have huge parks, and lots of sports fields, huge sports centres, convention and community centres, a university, art galleries, movie theatres, night clubs, restaurants or the sea close by. We don't have frequent bus services and train services that access work and education centres. We have streets full of cars and enormous trucks. Overloaded carparks. Crumbling narrow footpaths, (Or no footpaths, around the shopping centres and streets) Our public pathways have become carparks and are often strewn with rubbish from the many fast food and liquor outlets.

There are many examples of well planned housing developments around the world, where the health and well being of the residents is paramount. We need any development to be attractive and well designed. Suburbs that are built and work for happy healthy parents and children. We do not want suburban housing planned by private developers out to make a quick profit. Housing developments need to be well planned and built by governments works departments and community owned.

We definitely do not need to continue to be the suburb that is ignored until it can be a dumping ground for new problems.

12.5.2023

**Jackson, Andrew**

---

**From:** Dorothy Lovell-Smith <dotlsnz@gmail.com>  
**Sent:** Monday, 15 May 2023 8:50 pm  
**To:** Engagement  
**Subject:** Re: submission on Housing and business choice plan

Hi Aviva

Thank you for your email. You ask me to answer some questions but .. I do not understand what the questions are. I presume the first two questions could be about whether I gain advantage in my business or trade by putting my point of view.

I am in fact a retired person living on the pension in the 75-70yrs age bracket. I do not own a business or practise a trade. So I think the answer is [no.to](#) both questions.

The questions about whether I want to present my submission in person.

- 1.No I do not want to present in person
- 2 No I do not want to combine with someone else to present my submission,

Please please find someone who can write a submission form [that.is](#);- clear, simple.and not too "techie".but easy to use

-includes lots of space for personal opinion

-is not only asking for a point on a scale of agreement. (Sometimes I disagree with the whole basic premise)

-is realistic in the assessment of how long it will take to read the supporting information and write a submission. We should be able to save the form and return to it at a later time. OR If it can't be 'saved' we need to know that in the first paragraph so we can be encouraged to present our ideas by attaching a separate document..or copying and pasting from a saved document.into a designated space.

-includes the closing date.

Thank you  
 Dot Lovell-Smith



Virus-free. [www.avast.com](http://www.avast.com)

On Mon, 15 May 2023 at 07:39, Engagement <[engagement@ccc.govt.nz](mailto:engagement@ccc.govt.nz)> wrote:

Mōrena Dorothy,

Thanks for submitting your feedback on Proposed District Plan

I am so sorry to hear about your frustration. I can confirm that I will submit for you to the correct confirmation platform (as a normal submission instead of a late submission). Can you please answer the below questions?

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

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

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

1. Would you like to present your submission in person at a **hearing**? Yes or No.

2. If others, make a similar submission I will consider **presenting a joint case** with them at the hearing (do not tick if you would not consider a joint case). Yes or No.

Once again, we appreciate your time, and appreciate your feedback.

Ngā mihi,

## Aviva Cui

### Engagement Assistant

Communications and Engagement

Pronouns: she/her



03 941-6844 | 027 367 1828



[Aviva.cui@ccc.govt.nz](mailto:Aviva.cui@ccc.govt.nz)



Te Hononga Civic Offices, 53 Hereford Street, Christchurch



PO Box 73016, Christchurch 8154



[ccc.govt.nz](http://ccc.govt.nz)




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**From:** Dorothy Lovell-Smith <[dotlsnz@gmail.com](mailto:dotlsnz@gmail.com)>

**Sent:** Friday, 12 May 2023 4:05 pm

**To:** Engagement <[engagement@ccc.govt.nz](mailto:engagement@ccc.govt.nz)>

**Subject:** submission on Housing and business choice plan

Hi

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

Thanks

Dot Lovell Smith

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

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

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





## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 12/05/2023

**First name:** Callum **Last name:** Ward

**Organisation:** Waihoru Spreydon-Cashmere-  
Heathcote Community Board

**On behalf of:**

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Daytime Phone:** 027 556 2590

I could not

Gain an advantage in trade competition through this submission

I am not

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

a. adversely affects the environment, and

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

Note to person making submission:

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

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

Yes

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

Additional requirements for hearing:

### Consultation Document Submissions

Chapter 14 Residential **Points:** 077.1

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**

There are more feedback in this submission. Please see the attachment.

1. Residential Heritage Areas

The Board supports the creation of two Residential Heritage Areas in Waihoru Spreydon-Cashmere-Heathcote that merit inclusion as a Qualifying Matter, these being:

- MacMillan Ave (Cashmere)

Shelley/Forbes St (Sydenham)

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Attached Documents

File
PC13 WSCH Community Board

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## **Waihoru Spreydon-Cashmere-Heathcote Community Board**

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### **Submission on Christchurch City Council's Proposed Draft Heritage Plan Change (PC13)**

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The Waihoru Spreydon-Cashmere Community Board (The Board) appreciates the opportunity to make a submission to the Christchurch City Council on the Proposed Draft Heritage Plan Change (PC13), and thanks staff for the work done on this matter.

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

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

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

#### **1. Residential Heritage Areas**

The Board supports the creation of two Residential Heritage Areas in Waihoru Spreydon-Cashmere-Heathcote that merit inclusion as a Qualifying Matter, these being:

- MacMillan Ave (Cashmere)
- Shelley/Forbes St (Sydenham)

#### **2. Residential Character Areas**

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

#### **3. Heritage NZ List Entry of Cashmere Sanatorium Open Air Shelter**

The Board was pleased to learn of the additions to the Heritage schedule:

- The Tuberculosis Sanatorium Shelter Hut in Coronation Reserve, Huntsbury

- The modernist dwelling on Ford Rd, Opawa
- Sydenham Cemetery on Roker St, Somerfield
- Somerfield War Memorial Community Centre and Setting, on Studholme St, Somerfield
- 25 baches at Taylors Mistake and their settings

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

Yours sincerely,

A handwritten signature in black ink, appearing to read 'CW', is positioned below the text 'Yours sincerely,'.

**Callum Ward**

Chairperson, Waihoru Spreydon-Cashmere-Heathcote Community Board

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 12/05/2023

**First name:** Julie **Last name:** Villard

**On behalf of:**

**Postal address:** 21 Bridle Path

**Suburb:**

**City:** Lyttelton

**Country:** New Zealand

**Postcode:** 8082

**Daytime Phone:** 021771925

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:

### Attached Documents

File
Submission P13 Julie Villard



## Screen shots of my submission for P13

I tried 7 times to make a submission, and got extremely frustrated with the system, ending in a grey screen frozen after having hit the submit button.

You have now a copy of each page of my submission I would like acknowledged. Best regards Julie Villard

Our proposed Heritage Plan Cha × +

mission

If you consider there are compelling reasons why your contact details should be kept confidential, please contact our Statutory Administrator Adviser on 03 941 8999 or 0800 800 169 (Banks Peninsula).

[View the Christchurch City Council Privacy Statement 2020.](#)

Are you submitting as an individual or as an organisation?

Individual

Organisation

First name: \*

Last name: \*

On behalf of:

As part of your submission, you must provide an address we can use to contact you.

Email: *(preferred)*

Postal address: (or alternative method of service under section 352 of the Act)

21 Bridle Path, Lyttelton 8082

Daytime Phone:

1. Submitter Details

2. Submissions on Plan Change

3. Review my Submission Points

4. Supporting Documents

5. Submit

## Have your say

### Submission sessions time out after 45 minutes

Our feedback form works best if you're using Google Chrome. If you are using a different browser and you think you will need a little longer than this to make your submission, we advise cutting and pasting from a word document, to avoid losing any information.

If you have any questions, please contact the Engagement Advisor.

1. Submitter Details

2. Submissions on Plan Change

3. Review my Submission Points

4. Supporting Documents

5. Submit

Here is a table showing all the submission points that you have saved so far. If you would like to edit a point, simply click edit and save again. To delete a point, use the delete button provided in the table.

Plan Section	Support/Oppose	I seek the following decision from the Council <i>If seeking to make changes to a specific site or sites, please provide the address or identify the area</i>	My submission is that

Remove any yellow sites identified by Council as "neutral" (yellow) on the location map appendix 9.3.7.8.6 Lyttelton residential Heritage area.

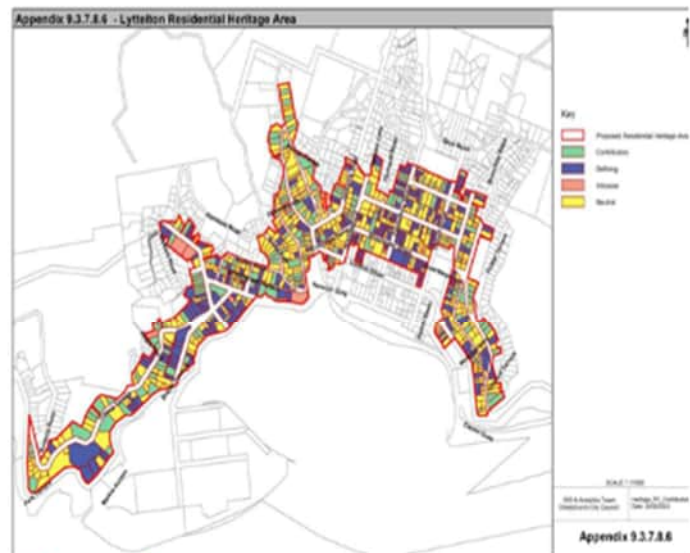
Remove entirely Lyttelton from the Heritage zoning.

I would like to advocate for people living in Lyttelton. Lyttelton is a village with more than 400 types of architecture according to Wikipedia it is a working port, and was at the epicentre of the 2011 earthquake. Lyttelton's fabric is constantly evolving, for the better and for the worse and that's why Lyttelton is well-known for: eclectic architecture. The new zoning called "heritage area", is a mistake, and Lyttelton will be locked in a cast iron "historical" image of the past, where every single move will be overseen and over restricted by the Council. Not to understand the need for a heritage area, that's why we have the character overlay area already in place. Well, even lately, it has been hugely controversial with 2 resource consents granted for the same in less than 2 years, the 2 approved by Council, and hugely rejected by the people of Lyttelton: 1 design is stuck in the past, the other one is modern. link here:

(<https://www.stuff.co.nz/national/126903301/planned-lyttelton-apartment-building-designed-by-firm-behind-landmark-building-in-wellington>)

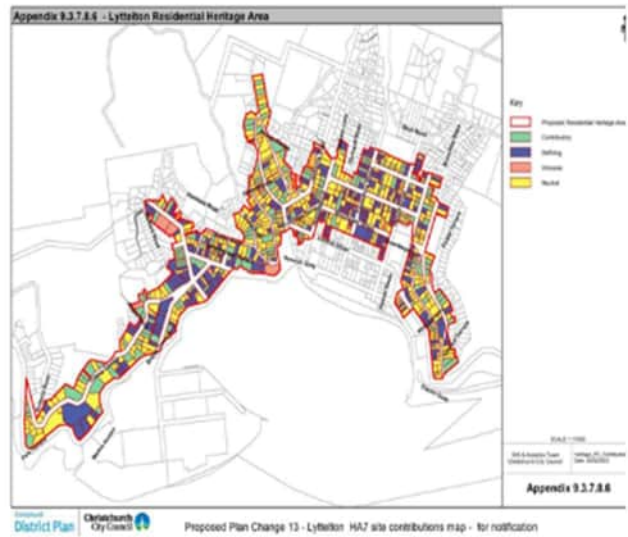
The Heritage zoning is once again too large and should be limited to sites directly identified as defining (blue) and contributory (green) the location map appendix 9.3.7.8.6 Lyttelton residential Heritage area

#### Location



Heritage  
zoning.

#### Location



Not more than that. As you can see on the map half of the sites of the proposed Lyttelton residential Heritage area are in yellow, meaning "neural" they do not have any architectural significance or historical values.

It is insane to me, to ask all these sites to be included in this new zoning. These sites do not deserve to be punished, or their current zoning reduced. One more thing: More RC for everyone is ridiculous, beautiful Lyttelton is also hatched from randomness, and Lyttelton is very much that.

1. Submitter Details

2. Submissions on Plan Change

3. Review my Submission Points

4. Supporting Documents

5. Submit

If you have any questions, please contact the Engagement Advisor.

1. Submitter Details

2. Submissions on Plan Change

3. Review my Submission Points

4. Supporting Documents

5. Submit

Please click the submit button to finalise your submission. Once you click submit, you will be sent a confirmation email from the Council.

\*

- I could  
 I could not

Gain an advantage in trade competition through this submission

- I am  
 I am not

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

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

Note to person making submission:

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

- 1991

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

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

Additional requirements for hearing:



The following questions are not part of your submission on the District Plan - you do not have to answer them. However, we would very much appreciate you telling us a little about yourself, as it helps us improve our engagement methods to reach people if we understand who we are hearing from.

Age:

- Under 18 years
- 18-24 years
- 25-34 years
- 35-49 years
- 50-64 years
- 65-79 years
- Over 80 years

Gender:

- Male
- Female
- Non-binary / another gender

Ethnicity:

- New Zealand European
- Maori
- Pacific Peoples
- Asian
- Middle Eastern/Latin American/African
- Other European
- Other

**Submit**

1. Submitter Details

2. Submissions on Plan Change

3. Review my Submission Points

4. Supporting Documents

5. Submit

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 12/05/2023

**First name:** Dr. Bruce **Last name:** Harding

**On behalf of:**

**Postal address:** 34 MacMillan Avenue

**Suburb:** Cashmere

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8022

**Daytime Phone:** 03/9426832

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

Dr Ann PC13

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 12/05/2023  
**First name:** Bruce **Last name:** Harding

**On behalf of:**

**Postal address:** 34 MacAdamia Lane

**Suburb:**

**City:** Waipapa

**Country:** New Zealand

**Postcode:** 0295

**Daytime Phone:** 039426832

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

Chapter 14 Residential **Points:** 079.1

- 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***

Clarity on the RHA 8 (Macmillan Avenue) boundary, as it was all covered in the Special Amenity Area (SaM 17 & 17A) provisions in the late 1990s City Plan. Why is one end of the street singled out and the home of John Macmillan Brown (35 Macmillan Ave) excluded? Do the former SaM17/17a character overlays still in place and continue to have effect? If not, why not? I would seek policy clarity in the finalized PC13 documentation by way of footnote or policy box for the better informing of citizens and ratepayers. The underlying heritage kaupapa/philosophy and criteria for character retention needs to be clearly affixed to planning documents/schemata.

**My submission is that**

I am speaking to Residential Heritage Area 8 (eastern Macmillan Avenue) and the need for the clear highlighting of historic properties in the CCC's digital & online files. I find it puzzling that collective character recognition (p.24) is not maintained throughout the whole of Macmillan Avenue but is focused rather clunkily on John Macmillan Brown's Lot DP sale of 1908. I would also wish to see an update on the delisting (if any) of Protected Trees in the Cashmere area within (or beyond) the RHA 8 zone, however it is defined.

My submission is that:

I would seek confirmation that homes/properties of iconic citizens (in all city RHAs) are clearly delineated in the revised City Plan—so for Cashmere, for example, "Rise Cottage" (Westenra Terrace), the Ngaio Marsh House (37 Valley Road), etc. My PDF re the Cashmere area outlines the names and addresses of a number of key cultural heritage sites/private properties (e.g. Cashmere Village Green, the Cashmere Presbyterian Church and 'Corrie', the Mackay family home in Macmillan Avenue) and urges that these are very clearly signaled. The same logic would pertain to all RHAs in Otautahi/Christchurch.

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#### Attached Documents

File
Bruce Harding

## Submission upon Dr Ann McEwen's PC 13 Report for Macmillan Avenue, Cashmere (1 February 2022).

As a long-standing resident and submitter to the 1995 City Plan revision hearings, and former Committee member of the now defunct Cashmere Residents' Association and SCAP Committee of the former Spreydon-Heathcote Community Board, I wish to make some constructive suggestions and also offer to appear *in personam* before a panel at a later stage of this consultation cycle. I hold various documents and files which I would be happy to supply and donate to the CCC Heritage stock (perhaps at Turanga), much of which relates to the Cashmere Village Green controversy of 1995-2000 which led to the happy outcome of the Cashmere Village Green Management Plan.

I am puzzled as to why CCC have removed the whole of Macmillan Avenue from the former Special Amenity Area 17 & 17A<sup>1</sup> in this new RHA, and why this document does not also identify a number of important cultural-architectural heritage properties (some outside the specific area of RH8 but sited in the wider Cashmere historic precinct) in something like a focus box.

I shall now send a running response commentary to various pages in Dr McEwan's excellent document:

- It seems odd/rather creaky or random to create Heritage Area 8 simply out of John Macmillan Brown's July 1908 subdivision zone east of Whisby Rd, when after his death in January 1935 at 35 Macmillan Avenue, 'his' end of 'his' street is excluded from the HA8 zone. Indeed, his 1915 Hurst Seager home ('Holmebank II') lies right outside that HA8 zone in a street named after him as an early land-owner and developer. Macmillan Avenue (often mis-spelt MacMillan on CCC documents) was first Macmillan Road at the east end to Whisby and the undeveloped western zone (i.e. west of Whisby Rd demarcation) was called Macmillan Track probably until after JMB's death. The reason for this cannot be a higher level of heritage intactness as Dr McEwan concedes that the 21 residential properties denote "a range of styles." There is a new Cymon Allfrey home at 18 (Clausius) and a completely modern replacement also at 16 Macmillan Ave on the site of the Mackay sisters' 'Corrie'. Homes designed by Hurst Seager and his pupil Cecil Wood (and other architects) can be found at the western end of the avenue, which escapes categorization.

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<sup>1</sup> See Special Amenity Area 17 & 17A: Hackthorne/MacMillan[sic]/Dyers Pass: Is your property in this Special Amenity Area?' Urban Design Team, City Solutions, CCC April 2001 (leaflet). Some of the properties highlighted in that document were demolished after the 2010-11 earthquake sequence.



- I would respectfully suggest that the [www.kahurumanu.co.nz/atlas](http://www.kahurumanu.co.nz/atlas) site of TRONT secures the view that the site of Pukeatua is not precisely delineated as a regional marker for Cashmere.
- A typo cites Heritage NZ as “Pouhere Toanga”--TAQNGA.
- When discussing biota, the consultant (p.3) elides 2 Whisby Road and 35 Macmillan Avenue in citing the late Thelma Strongman’s 1984 book to describe Professor Macmillan Brown’s garden varieties. Mrs Leggat (as she later became) intended to describe the ‘Holmebank’ garden which is now outside Heritage Area 8. There was little noted vegetation on Sue Kennett O’Brien’s family property at 2 Whisby (now owned by Oscar Alpers).
- I would suggest that the Bibliography also includes *The Memoirs of John Macmillan Brown* (edited by Mrs Viola Notariello). (Christchurch: University of Canterbury/Whitcombe & Tombs, 1974). [UC Publication # 19: General Editor A.N. Brooks. ISBN 900302 19 3 ]
- On page 3 there is a failure to credit the architect Robert J. Seward (Manson, Stanton & Seward) for designing both the extension and the tower for the Cashmere Hills Presbyterian Church in 1960-61.
- On page 5 reference is made to John Dyer. The land deeds for the zone across to Governor’s Bay called the Cashmere portion “Latters Spur Road”. This should be referenced for historical accuracy.
- On page 7 it would be useful to re-check Gordon Ogilvie’s 1977 book *The Port Hills of Christchurch* and name the Rev Isitt and Mayor Tommy Taylor, whose home at 63 Dyers Pass Road (‘Whareora’) sits opposite The Green. It may not be heritage-listed but should go in my info-box in this document.
- On page 8 vague reference is made to a “bus-stop” at the Dyers Pass-Macmillan junction. This community shelter was installed as bus services ceased. It is the positive outgrowth of a large community conflict with CCC and I paid for and installed a metal plaque inside it to record this. It was intended to be a small replica of the Sign of the Bellbird exterior but Stephen Grey and a CCC design team reconfigured it most sensitively to align visually with the design values of the Presbyterian Church Hall (and church).

- I think a Heritage Building summary-box graphic, supplemental to the HA8 report, should note the existence of older 'character' properties within or outside the HA zone, including JMB's Hurst Seager home (35 Macmillan); 'Corrie' (now demolished) for the Mackay sisters (16 Macmillan); the Ngaio Marsh House at 37 Valley Road (with Sherwood Lane access); Ursula Bethell's 'Rise Cottage' in Westenra Terrace, Dean Harper's home 'Cloudsley' at 39 Macmillan, along with Norman and Enid Hardie's A-frame at 15A and doubtless others not identified by me. The Ngaio Marsh House (1906) is subject to a CCC Covenant (1999) and was originally designed by Samuel Hurst Seager and amended by the architectural practices of Guy Cotterill and Don Donnithorne. Properties at 14, 25 (Miles Warren & Maurice Mahoney), 29, 34 (Cecil Wood and later Collins, Hunt, Loveridge), 40, 43, 44 and 46 (Alan Brassington's) also seem to possess SaM-like heritage values and character 'intactness'. (I have doubtless missed some others.)
- I am not arguing for any particular outcome—merely raising a flag for the commissioner/s to cross-check why these properties were actually removed from coverage—i.e. why eastern Macmillan Avenue has been so strictly delimited in zoning Heritage Area 8 for PC13. Does any of the old SaM coverage still apply, at a lower level of protection, for properties which are sited west of the Whisby Road subdivision line of 1908? Is the logic for this new delimitation, under Plan Change 13, a policy view that character retention eastwards of the Whisby boundary line is essential as properties sited there represent the oldest Macmillan Avenue building stock? That makes sense but, if so, it needs to be better emphasized in any final document, for the better understanding of Macmillan Avenue residents.
- I notify the Council that I hereby reserve the right to appear briefly on any substantive issues arising out of the PC13 when 'in person' hearings ensue. I would send in advance and also bring with me any actual change or modification submission at that point.

Yours faithfully

**(Dr) Bruce Harding**  
**'Harwood'**  
**34 Macmillan Avenue**  
**Cashmere**  
**Christchurch 8022**

03/942-6832 or [beharding83@gmail.com](mailto:beharding83@gmail.com)

Save time and do it online

ccc.govt.nz/haveyoursay

Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

Gender:  Male  Female  Non-binary/another gender

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

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

\* Required information

Name\*

BRUCE HARDING

Address\*

34 Macmillan Avenue

Postcode\*

8022

Email

bharding83@gmail.com

Phone no.

03/9426832

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

Organisation's name

NAA.

Your role

Trade competition and adverse effects\* (select appropriate)

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

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

(a) adversely affects the environment, and

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

 Yes No

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

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

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

Joint submissions (Please tick this box if you agree)

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

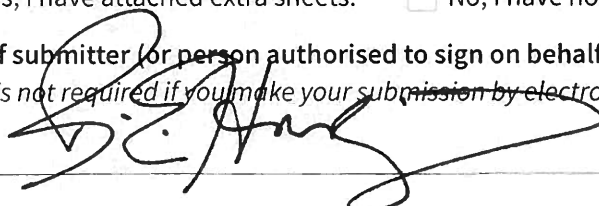
If you have used extra sheets for this submission, please attach them to this form and indicate below\*

 Yes, I have attached extra sheets.  No, I have not attached extra sheets.I have emailed  
in PDF to Jane  
West

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

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

Signature



Date

11 May 2023

Have your say  
Heritage Plan Change 13

cf. My PDF Submission,  
sent to Jane  
West as it  
would not upload onto your site.

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

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

Residential Heritage Area 8 (eastern Macmillan Avenue) and the clear highlighting of historic properties in the CC's digital & online files. It is puzzling that collective character recognition (p. 24) is not maintained throughout the whole of Macmillan Avenue.

My submission is that:\*

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

I would seek confirmation that ~~sets~~ homes/properties of iconic citizens are clearly delineated in the City Plan. My PDF re the Cashmere area outlines the names and addresses of key Cashmere cultural heritage sites/properties (e.g. the Ngāio Marsh house and the Cashmere Village Green) are clearly signaled.

I seek the following decision from the Council:\*

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

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

Clarity on the RAA 8 (Macmillan Avenue) — why is one end of the street singled out? Do the old SAM 17 & 17a / Character Area overlays continue to have effect? (i.e., as per the 1996 at-seq. City Plan overlays)

I would plan to speak to the Submission forwarded electronically to Mrs West.



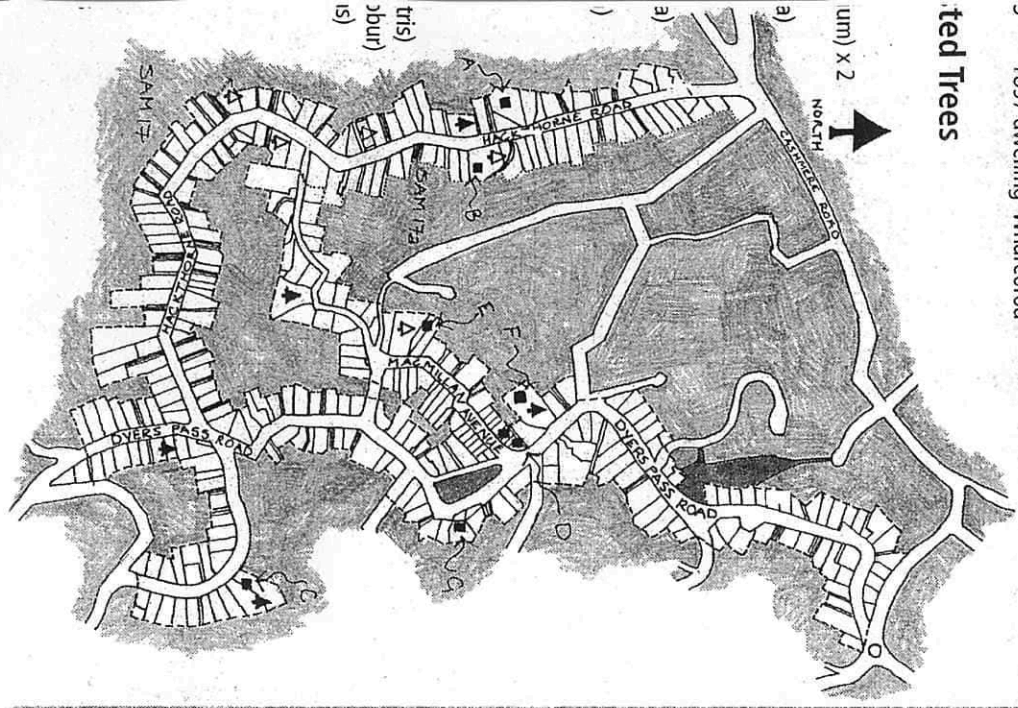
**6** Hackthorne/MacMillan/Dyers Pass

**Buildings**

- 0 1910 two storey dwelling
- 7 1915 English Domestic Revival style dwelling
- 11 1928 two storey wooden residence
- 1929 Cashmere Hills Presbyterian Church
- 8 1918 wooden dwelling
- 4 1896 two storeyed English Domestic Revival residence
- 3 1897 dwelling 'Whareoroa'

**Planting**

10m x 2

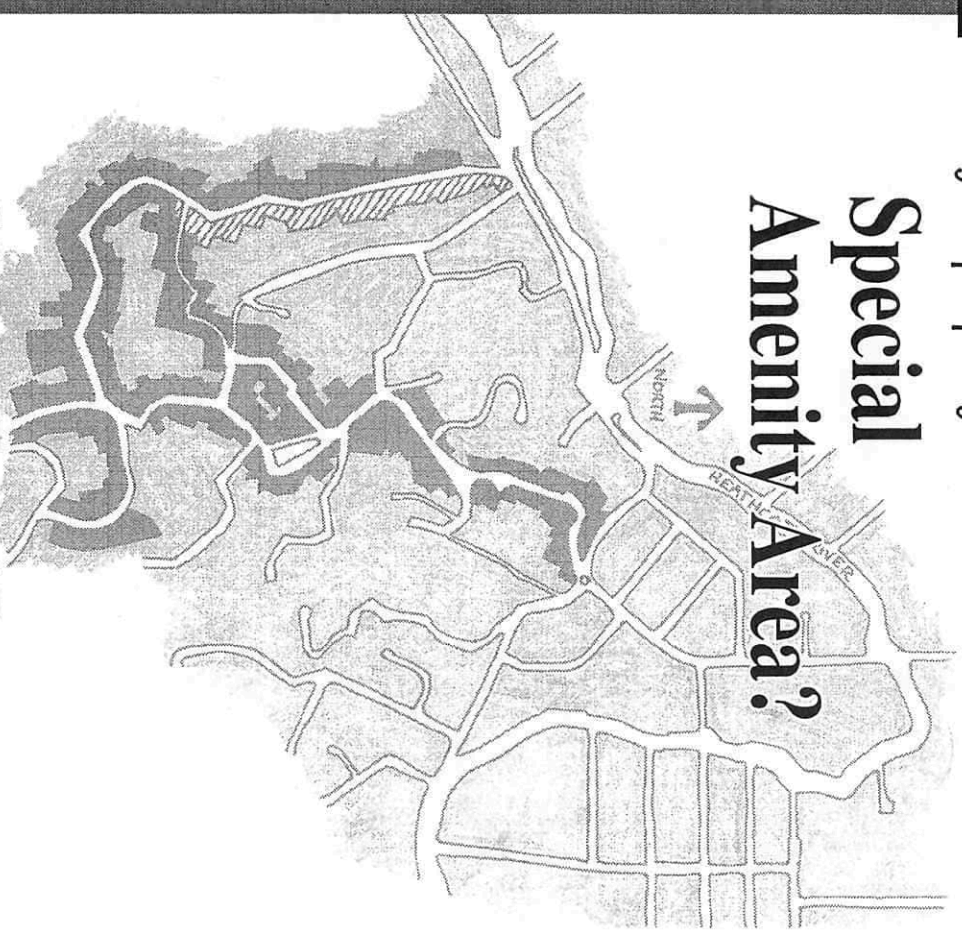


**17**

**special amenity area**

Is your property in this

**Special Amenity Area?**



**SAM 17 & 17a**  
Hackthorne/MacMillan/Dyers Pass

Urban Design Team, City Solutions

**CHRISTCHURCH**





## What is a SAM?

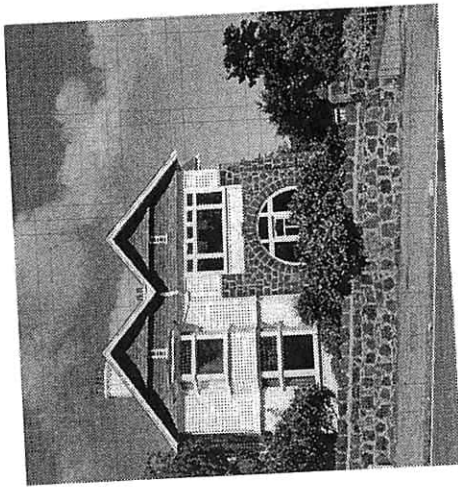
A SAM is a Special Amenity Area. These are areas within the living zones of Christchurch City that are in some way distinctive from the surrounding neighbourhoods and are considered to have a character worth retaining. Neighbours and communities need to rely on each other to help maintain this character effectively, in combination with Council initiatives.

## The Character of SAM 17 & SAM 17a

SAM 17 is located in Cashmere and includes the lower reaches of some of the better known roads on Cashmere hill such as Dyers Pass Road and Hackthorne Road. SAM 17a follows the eastern side of Hackthorne Road from MacMillan Avenue to Cashmere Road.

The SAMs have a mix of housing, the majority of which was built prior to 1920. The most predominant style of housing is the English Domestic Revivalist style, characterised by the steep pitch gable main roofs, with small dormers or secondary roofs, all of which tend to be tiled. They also have weatherboard exteriors with large windows, and porches facing the street. These features are more predominant in SAM 17a than SAM 17, resulting in stronger City Plan controls in the latter SAM.

The area is also notable for the rock and stone walls and well vegetated sites, incorporating both large trees and shrub planting. Fences and hedges tend to be of a medium height, and are common. The special quality of this area is that all these elements result in an interesting landscape and streetscape with glimpses into properties and planting spilling into the street, drawn together by the common architectural elements.



choose the materials and height of the fence carefully in combination with boundary planting, so that it is in keeping with the existing qualities of the street. Stone retaining walls are very much a part of the character of these older hillside suburbs and may be considered a first choice if a fence or wall is needed. Also consider alternatives to fencing and walls such as hedges, as a way to link planting with the street. 'Thinking about Fencing' – a guide to fencing alternatives, is available free from the Christchurch City Council.

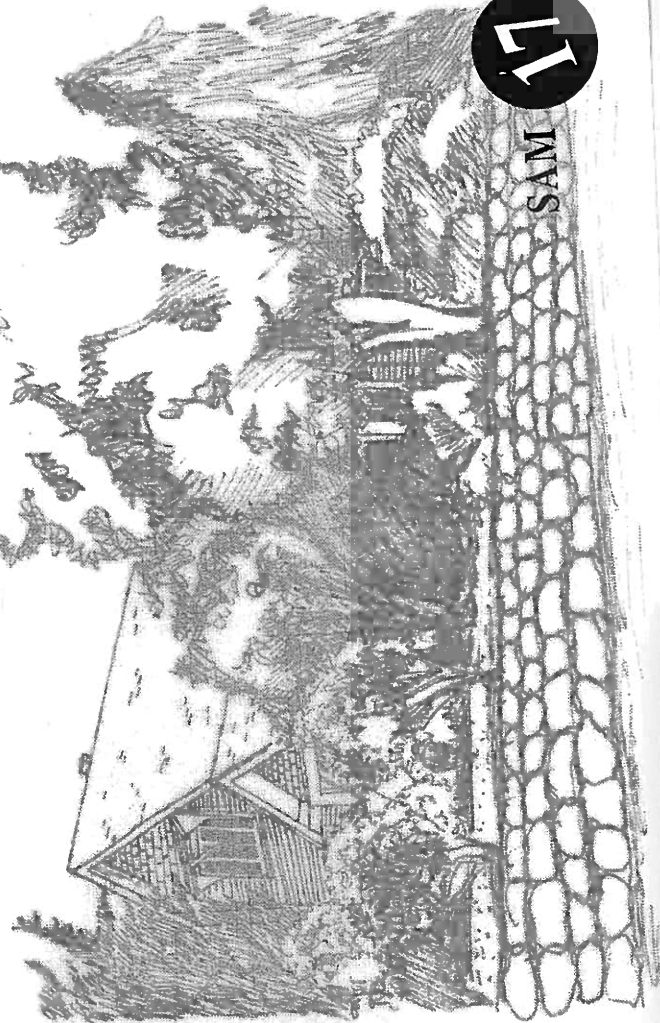
Additionally, the placement of garages in the front yard can be visually detrimental and is best avoided.

## City Plan Rules

SAM 17 and SAM 17a are in the Living Hills zone in the Christchurch City Plan. The Plan contains a set of rules that regulate the way sites can be developed. There is an additional rule to the standard Living Hills rules that applies to SAM 17 and SAM 17a, which acknowledges the areas as having special qualities that should be retained. The rule below applies to both SAM 17 and SAM 17a. It is:

- **Road Setback (Streetscene)**  
Road setback is the distance that a building must be set back from the front boundary. Buildings are required to be set back at least 4.5m because of the visual impact that the relationship between the buildings and their proximity to the street has on the overall character of the street.  
A further rule applies to 17a only. It is:
  - **External Appearance**  
Resource Consent is required when an alteration to the external appearance of an existing building, or a new building, is proposed in SAM 17a, that can be seen from a public place such as the street.

If you are considering altering the external appearance of a building in SAM 17 or 17a, or building anew, and you need a Resource Consent it is recommended that you seek advice from the Urban Design Team in City Solutions of the Christchurch City Council, before submitting your application.



## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 12/05/2023  
**First name:** Jo **Last name:** Appleyard  
**Organisation:** Lyttelton Port Company Limited

**On behalf of:**

**Postal address:** 60 Cashel Street

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:** 8041

**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.

Additional requirements for hearing:

### Attached Documents

File
LPC submission on PC13 (002)

## Form 5

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

*Clause 6 of Schedule 1, Resource Management Act 1991*

**To** Christchurch City Council

Name of submitter: Lyttelton Port Company Limited (*LPC*)

- 1 This is a submission on the proposed Heritage Plan Change to the Christchurch District Plan (*PC13*).
- 2 *LPC* could not gain an advantage in trade competition through this submission.
- 3 The specific provisions of *PC13* that *LPC*'s submission relates to and the general and specific reasons for *LPC*'s submission are set out in **Appendix 1**.
- 4 *LPC* seeks the following decisions from the Hearings Panel on behalf of Christchurch City Council:
  - 4.1 Grant the relief as set out in **Appendix 1**; and
  - 4.2 Grant any other similar or consequential relief that would address *LPC*'s concerns set out in this submission.
- 5 *LPC* wishes to be heard in support of the submission.
- 6 If others make a similar submission, *LPC* will consider presenting a joint case with them at a hearing.

**Signed** for and on behalf of Lyttelton Port Company Limited by its solicitors and authorised agents Chapman Tripp



---

Jo Appleyard  
Partner  
12 May 2023

Address for service of submitter:

Lyttelton Port Company Limited  
c/- Annabelle Lee  
Chapman Tripp  
Level 5, PwC Centre

60 Cashel Street  
PO Box 2510  
Christchurch 8140  
Email address: [annabelle.lee@chapmantripp.com](mailto:annabelle.lee@chapmantripp.com)



**APPENDIX 1: LPC SUBMISSION ON PC13**

- 1 Lyttelton Port Company Limited (*LPC*) welcomes the opportunity to submit on the proposed Heritage Plan Change to the Christchurch District Plan (*PC13*).
- 2 LPC also notes and appreciates the consultation undertaken by Christchurch City Council (*CCC*) in its preparation of PC13.
- 3 Lyttelton Port of Christchurch (*Lyttelton Port*) is the South Island's major deep-water Port and is New Zealand's third largest container terminal by volume, after Port of Tauranga and Ports of Auckland.
- 4 Lyttelton Port is the primary international gateway for the South Island, with Christchurch being the major distribution centre for inbound goods. Export customers include a wide variety of dairy, meat, forestry, horticultural, and manufacturing businesses, as well as coal which is an important export for the west coast region.
- 5 Of relevance to PC13, the whole of Lyttelton township is identified as containing heritage values through the Lyttelton Residential Heritage Area (*LRHA*).<sup>1</sup> LPC supports the spatial extent of the LRHA as notified.
- 6 It is noted that the LRHA explicitly excludes Lyttelton Port and non-residential land. LPC supports this exclusion given existing Port infrastructure is largely modern in nature. Furthermore, there is a functional and operational need for certain structures in certain locations and LPC must be able to operate, maintain and upgrade Port infrastructure, as nationally significant infrastructure. It would be inappropriate for such infrastructure to be subject to the planning framework applicable to heritage items.

---

<sup>1</sup> As identified in the proposed Appendices 9.3.7.7.6, 9.3.7.8.6 and 9.3.7.9.6.

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 12/05/2023  
**First name:** Mike **Last name:** Percasky  
**Organisation:** Duncans Lane Limited

**On behalf of:**

**Postal address:** PO Box 365

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:** 8013

**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.

Additional requirements for hearing:

### Attached Documents

File
PC13 submission Duncans Lane Limited

## Form 5

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

*Clause 6 of Schedule 1, Resource Management Act 1991*

**To** Christchurch City Council

**Name of submitter:** Duncans Lane Limited (**DLL**)

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

**Signed** for and on behalf of Duncans Lane Limited



---

*pp.* M Percasky  
12 May 2023

Address for service of submitter:

Duncans Lane Limited  
c/- Novo Group Limited  
Attention: J Phillips  
PO Box 365  
Christchurch 8013  
Email: [jeremy@novogroup.co.nz](mailto:jeremy@novogroup.co.nz)

## ANNEXURE A

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

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

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

No.	Provision	Position	Submission	Relief Sought
1.	Heritage items and settings aerial map  (Aerial map reference 693, Heritage item number 1432, heritage setting number 604)	Oppose	The submitter opposes the increased spatial extent of the heritage item and setting proposed (for the Duncan’s Buildings) on Aerial map reference 693 for heritage item number 1432 and heritage setting number 604. Among other reasons, the submitter is concerned at the increased costs and regulation imposed by the change relative to the benefits of the change.	Retain the existing spatial extent of the heritage item and setting for the Duncan’s Buildings as shown on Aerial map reference 693, Heritage item number 1432, heritage setting number 604.
2.	Revisions to historic heritage rules generally	Oppose	<p>The submitter is opposed to PC13 to the extent that it proposes to amend the historic heritage rules in the Plan in such a way that will be less enabling and/or will result in greater regulation or resource consent requirements for development requirements.</p> <p>The submitter is particularly concerned with proposed amendments to definitions, policies, rules, and assessment matters where such amendments will be inconsistent with:</p> <ul style="list-style-type: none"> <li>• strategic objective 3.3.1 to ‘foster investment certainty’; and,</li> </ul>	Delete/reject proposed amendments to definitions, policies, rules and assessment matters in PC13 and retain the status quo in respect of these provisions.

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



## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 12/05/2023

**First name:** Christian **Last name:** Jordan

**On behalf of:**

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Daytime Phone:**

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:

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

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

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

### Attached Documents

File
submission to council (003)

## PC13 Submission CCC

### Historic Heritage:

1. This *Plan* review should not be used to remove any Historic Sites from the register even if the site is damaged or destroyed.
2. A qualifying matter requiring an assessment of the heritage value for any pre 1940 building intended for demolition should be created.
3. The *qualifying matter* should require options for retention and reuse of any pre 1940 building (either in situ or via relocation within the site or immediate local area) to be considered prior to granting demolition consent. Consent for demolition should only be granted if the building does not contribute to the character of the area. This should apply across the entire city and not just in *Heritage* areas.

### Heritage Areas:

Further heritage areas need to be assessed and created across the city to protect Christchurch's remaining built history. Further thorough examination of the city needs to be undertaken to achieve this, however a requirement for all pre 1940 homes to be assessed prior to demolition consent being granted would counteract the urgency in identifying the appropriate areas needing protection.

Built history tells the story of the city and after a period of such great loss following the Christchurch earthquakes, far greater effort needs to be made to preserve the best of what remains.

### Rationale:

Heritage tells the story of our past. It is also a gift from *past generations* to *our* future.

Memories of place are important for a sense of belonging and community.

Actively discouraging developers who do not value heritage buildings by requiring them to do additional assessment before demolition consent is granted (irrespective of a buildings heritage status), will create opportunities for other buyers to develop and restore these buildings in a way that respects their heritage values.

Often it is only a marginal decision whether a building can be saved or demolished and encouraging development of later (and now often dilapidated) 'tract' or 'housing company' 1950s and 60s homes sitting on large sites but still within close proximity of suburban centres is a better outcome for the city.

High quality houses with heritage value often sit on slightly larger sections which in a rapidly rising market through late 2020 to early 2022, led to decisions to demolish being made purely on the economics at *that moment in time*, rather than on the long view of the intrinsic value that a heritage building may have.

As these are irreversible losses, and the value of workmanship on these buildings generally well exceeds the current market value of the improvements, real care is needed to ensure potential value for future generations is not being discarded on the basis artificial economics.

**Artificially constraining zonings outside areas of pre 1940 homes while liberalising zoning in areas containing significant numbers of pre 1940 homes, creates artificial economic rationale for heritage demolition.**

The solutions for the city should also be read in context of my submission on PC14.

**Christian Jordan** May 2023

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 09/05/2023

**First name:** Claire **Last name:** Coveney

**On behalf of:**

**Postal address:** 13 Earl Street

**Suburb:** Hillsborough

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8022

**Daytime Phone:** 0274901234

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

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

Note to person making submission:

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

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

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

### Attached Documents

File
Claire Coveney PC13

Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

Gender:  Male  Female  Non-binary/another gender

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

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

\* Required information

Name\* Claire Coveney  
Address\* 13 Earl Street Opawa Postcode\* 8022  
Email clairecoveneyis@gmail.com Phone no. 0274901234

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

Organisation's name \_\_\_\_\_

Your role \_\_\_\_\_

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

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

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

(a) adversely affects the environment, and

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

Yes  No

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

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

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

Joint submissions (Please tick this box if you agree)

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

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

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

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

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

Signature Clare Coveney Date 9.5.23  
5.9.23



Have your say

## Housing and Business Choice Plan Change 14

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

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

Trees.

You cannot mitigate loss of large canopy trees with money.  
Tree felling loses an carbon sink!  
Increases heating, flooding  
↓ Reduces biodiversity

My submission is that:\*

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

There is a lack of commitment to protect well established older trees in our suburban areas, the older areas, especially.

There is a lack of commitment to protect our future food supply by having community gardens established & supported in every community.

I do not agree with 20% contribution fund in lieu of removing all trees. Poorer areas will suffer more heating & flooding. There is no guarantee trees can be planted from funds. Ecosystems & wildlife will disappear.

I seek the following decision from the Council:\*

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

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

Older established trees, that are healthy and not blocking a housing area to be protected. Especially native trees. / shrubs.

Trees, especially native trees, shade trees are to be planted and maintained by council (developers are renowned for forgetting) on every development.

no pay outs!      no mitigation \$.

Developers are wealthy enough

## Have your say

### Heritage Plan Change 13

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

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

Trees

**My submission is that:\***

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

We have run out of time to wait for trees to grow. Well established trees provide a great carbon sink. The council lets wealthy developers to remove trees by 20% financial contribution fund. How will the council be held accountable for each contribution, that it will go to plant trees, where they have been removed.

**I seek the following decision from the Council:\***

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

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

no financial contribution fund.  
Onus on developers to retain bushes & trees on the parameters of properties.  
Roadside tree plantings are not viable in some of the areas undergoing medium to high density housing.



Kōrero mai

# Have your say on the District Plan changes:

## Housing and Business Choice

(Plan Change 14)

## Heritage

(Plan Change 13)

Consultation document

Consultation closes 3 May 2023

[ccc.govt.nz/haveyoursay](https://ccc.govt.nz/haveyoursay)

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 03/05/2023

**First name:** Anton **Last name:** Casutt

**On behalf of:**

**Postal address:** 9 Johnson Street

**Suburb:** Sydenham

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8023

**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.

Additional requirements for hearing:

will consider a joint case.

### Attached Documents

File

Anton Casutt submission PC13 Redaction please

Save time and do it online

ccc.govt.nz/haveyoursay

Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

Gender:  Male  Female  Non-binary/another gender

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

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

\* Required information

Name\* Anton Casutt  
Address\* 9 Johnson St, Sydenham Postcode\* 8023  
Email \_\_\_\_\_ Phone no. \_\_\_\_\_

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

Organisation's name \_\_\_\_\_  
Your role \_\_\_\_\_

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

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

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

- (a) adversely affects the environment, and  
(b) does not relate to the trade competition or the effects of trade competition?  Yes  No

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

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

- I wish to speak in support of my submission on Plan Change 13 - *don't want to speak on this*  
 I wish to speak in support of my submission on Plan Change 14  
 I do not wish to speak.

**Joint submissions** (Please tick this box if you agree)

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

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

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

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

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

Signature Anton Casutt Date 03/05/2023



## Have your say

### Heritage Plan Change 13

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

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

Adding Scott St Sydenham  
to a Heritage or character  
area

~~intended~~

My submission is that:\*

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

There are a lot of 1850's workers cottages in Scott St. There is one new cottage that was built about three years ago in the same style as the old cottages. There is also another cottage that was built about fifteen years ago in the same style as the old cottages.

Keep some of our history and building design.

I seek the following decision from the Council:\*

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

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

Adding Scott St Sydenham  
as a Heritage or Character area.

Kōrero mai

# Have your say on the District Plan changes:

## Housing and Business Choice

(Plan Change 14)

## Heritage

(Plan Change 13)

Consultation document

Consultation closes 3 May 2023

[ccc.govt.nz/haveyoursay](https://ccc.govt.nz/haveyoursay)

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 12/05/2023

**First name:** Ross **Last name:** Gray

**Organisation:** Christchurch Civic Trust

**On behalf of:**

**Postal address:**

**Suburb:**

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8052

**Daytime Phone:** 0212063620

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.

Additional requirements for hearing:

### Attached Documents

File
Christchurch Civic Trust - Email
Christchurch Civic Trust submission on PC 13 May 12 2023
Extract from 1 March 2023 CCT Deputation to CCC on PC 13 Heritage
Extract from 1 March 2023 CCT Deputation to CCC on PC 13 Heritage

**Mulder, Andrea**

---

**From:** Ross and Lorraine Gray <rosslogray@xtra.co.nz>  
**Sent:** Friday, 12 May 2023 1:45 pm  
**To:** Engagement  
**Subject:** CCT Submission on PC 13  
**Attachments:** Christchurch Civic Trust submission on PC 13 May 12 2023.pdf; Extract from 1 March 2023 CCT Deputation to CCC on PC 13 Heritage.pdf; Re-Use and Recycle to Reduce Carbon-2019-Historic England.pdf

Dear Engagement Officer,

Please find attached a submission on **PC13** from Christchurch Civic Trust. My details, as per the Consultation document, are as follows:

Name **Ross Gray**

Address **52A Jeffreys Rd Christchurch** Postcode **8052**

Email [rosslogray@xtra.co.nz](mailto:rosslogray@xtra.co.nz) Phone no. **021 206 3620**

**Responding for Christchurch Civic Trust**

Role **Chair**

I could **not** gain an advantage in trade competition through this submission

**I wish to speak in support of my submission on Plan Change 13**

**Please see PDF attachment**

Ross Gray 12 May 2023





The Christchurch Civic Trust Inc. PO Box 2632, Christchurch 8140, New Zealand

## CHRISTCHURCH CIVIC TRUST SUBMISSION ON CCC PLAN CHANGE 13

May 12<sup>th</sup> 2023

**Christchurch Civic Trust ('CCT')** appreciates the opportunity to contribute further to the achievement of a sustainable, equitable and efficient resolution for Christchurch of the issues arising from the Government-imposed housing intensification directives requiring Plan Changes 13 and 14 that will be considered by the Independent Hearings Panel.

### INTRODUCTION

**Christchurch Civic Trust (founded in 1965) Mission Statement:**

***“The role of Christchurch Civic Trust is to promote civic pride in Christchurch and surrounds by its ongoing public advocacy for good urban design and architecture, and by raising public awareness of the importance of the city’s natural and built heritage.”***

By way of example, CCT has mounted many successful campaigns to this end, which included *inter alia* opposing the 2004 Museum redevelopment proposal and the 2010 Arts Centre Music School proposal; leading campaigns to save and restore Mona Vale and McLean’s Mansion; and ensuring that the Mt Vernon block became a much-loved restorative and recreational haven for all city dwellers. CCT has strongly supported the reinstatement of Christ Church Cathedral. CCT has advocated tirelessly for Hagley Park, the city’s premier – and arguably the nation’s most significant – central city recreational open space and cultural heritage site.



## 1. Our Heritage Our Taonga

from the 2022 CCC pre-engagement draft PC 13 document:

**“ISSUE 3 – Further buildings and items justify protection in the Schedule of Significant Historic Heritage”** “...The Canterbury earthquakes resulted in large scale loss of heritage buildings in the District, particularly in the central city. The Council’s Heritage Strategy “Our Heritage Our Taonga” (2019) notes that feedback from the community is that our remaining built heritage is seen as even more precious and valuable ...”

This point was made strongly by CCT and Historic Places Canterbury, (‘HPC’) during development of the Heritage Strategy. In fact, both groups requested that a reference and link to the heritage groups’ Weebly website documenting the enormous post-earthquake losses be included in the strategy document. This was not done.

[www.canterburyearthquakedemolist.weebly.com](http://www.canterburyearthquakedemolist.weebly.com)

## 2. CCT response to Plan Change 13 material in Christchurch City Council (‘CCC’) Have Your Say ‘full consultation document’, May 2023.

*NOTE:* public response to the ‘full consultation document (PDF, 4.1MB)’ may have been more readily facilitated if links to (key) detailed planning documents had been inserted into the consultation document itself.

p18 **Heritage buildings and items and RHAs:** an instance where a link to the detail of the proposed ‘buffers’ would have been helpful.

p19 **Residential Character Areas:** CCT fully supports proposed measures.

**Trees** The marked decrease in Christchurch canopy cover is an outrage which must be reversed. In contrast to nearly all the other Tier I cities, Christchurch’s planar topography requires relatively more trees (including large ones), not fewer – and that is just for social and aesthetic reasons, let alone providing green lungs to mitigate global heating. CCC should aspire to promoting Christchurch as ‘the City of Trees’!

Para 2: an example or two of ‘other non-regulatory ways’ would have been helpful.

Para 3: a thoughtful proposal, but takes little or no account of the amenity value tree planting provides when it is in close proximity to where residents live, rather than in far-flung pockets.

Para 4: CCT fully supports the proposal that the Schedule of Significant and Other Trees becomes a Qualifying Matter. CCT is concerned at an apparent lack of ready reference to penalties for destruction of such trees; penalties should be commensurate with the loss to the city's natural and cultural infrastructure. A deterrent bespoke replacement tree growth variable cost formula should be established and widely publicised.

Paras 6, 7 are positive with outcomes of public response to the Urban Forest Plan awaited with high interest.

p24 **Heritage Plan Change (PC 13) Residential Heritage Areas:** CCT has already offered support for proposed CDP protection for 11 new RHAs as a Qualifying Matter. The continued threat to the Scheduled Highly Significant Englefield Lodge, at the core of the Englefield Avonville RHA, greatly concerns CCT, HPC, the Englefield Residents' Association and many other residents of Christchurch. This is the site of the city's oldest substantial heritage residence with an enormously important historical connection to the founding of the city. It should be noted that this RHA is the eastern-most in the city.

p25 **PC13 Changes include:**  
bullet point 1 CCT (and HPC) strongly advocated for the 44 additions to the CDP Schedule of Significant Historic Heritage. Presentation was made by CCT to CCC (May 2022 and 1 March CCC PC Notification meeting) for inclusion / retention of: Upper Riccarton War Memorial Library, Englefield Lodge; Princess Margaret Hospital buildings, Daresbury. In the pre-engagement round CCT advocated for the inclusion of the remaining Barnett Avenue Pensioner Cottages.

bps 2 and 3 are fully supported by CCT. Clear guidelines as to possible changes to buildings without a resource consent will be required; link to details would have been helpful.

p27 **Next steps for our plan changes:**  
**glaring error** in penultimate sentence of para 3 (rh column) which should say '... be March / April **2024.**'

**potential confusion** between final sentence 'All heritage-related controls ...immediate legal effect upon notification ...' and in Decision-making process step 6 'By April 2024 ... and Heritage Plan Change become operative'

Decision-making process: there is also a need to clarify step 5 – the Minister for the Environment does not make the final decision for disputed PC 13 heritage matters.

### 3. Specific Heritage Items /Sites of concern to CCT

- **Hagley Park ('HP')**: The encroachment on HP values by the 2021 Resource Consent for the Ryman Healthcare development on Park Tce and adjacent streets was of considerable concern to CCT, ICON and others. Objections were made to the exceedance of height limits of buildings facing HP. Such concerns continue, despite there being no sign of building on that site. CCT urges that height exceedances, which in this case were allowed in the extreme by the Commissioners under the operative CDP, do not occur under PC 14 with the potential for deleterious outcomes also impacting on PC 13 Heritage. Given the significance of the Government-imposed building height increases, there must be no room for further height creep.

**For further discussion refer to Appendix A**

- **Upper Riccarton War Memorial Library ('URWML')**: its future remains an open question with CCT and HPC awaiting a staff report following the groups' September 2022 submission on future adaptive reuse. We urge that inclusion of URWML in the Schedule of Heritage buildings is made as soon as is practicable.

- **The Princess Margaret Hospital buildings and site ('PMH')**: it was hoped by CCT that PMH would also be included in the Schedule. It has been stated by the Heritage Team that this can be considered at a future date. CCT urges that this does happen as soon as practicable. Apart from its being one of the few mid-later 20C major buildings to survive post-quake demolition (which deprived the city of the former Millers building and the former Christchurch Railway Station), PMH is an integral part of the area's and city's historical psyche and offers vast potential for adaptive reuse. Equally, if not more importantly, it is an enormous store of embodied energy. If demolished, it will be a huge source of CO2 emissions, including as a result of replacement buildings on the site. CCT urges that the buildings, with 4 hectares (40,000m<sup>2</sup>) of floor space, are retained.

**For further discussion refer to Appendix B**

- **Daresbury House ('Daresbury')**: alarmingly, the owner of Daresbury in Fendalton is seeking its removal from the Heritage Schedule. This is one of the nation's great domestic buildings, a Hurst Seager masterpiece, residence of the Governor-General (1940 -1950). Daresbury received the Christchurch Civic Trust Supreme Award for restoration and refurbishment in November 2010. If it is removed from the Schedule, this heritage taonga will be completely open to demolition, with no protection whatsoever because a resource consent to demolish will not be required. Furthermore, although it

was built after 1900, its potential protection under an archaeological authority, which may pertain to the site, gives no guarantee of protection for the building itself. **CCT considers it essential that Daresbury remains as a Highly Significant building on the CCC Heritage Schedule.**

(Refer to separate PDF: extract from 1 March 2023 CCT Deputation to CCC on PC 13, Daresbury and Englefield)

- **Englefield Lodge:** it is greatly appreciated that Englefield Avonville historic area has been notified as a Residential Heritage Area. As noted earlier, along with many others, CCT despairs at the continuing ‘demolition by neglect’ of Englefield Lodge, a Highly Significant building on the CCC Heritage Schedule. Recipient In 1973 of an undertaking by Prime Minister Norman Kirk to ensure its continued existence, this residence is the city’s oldest remaining substantial heritage dwelling (1855-6, 280 m<sup>2</sup>). It should form the core of a vibrant Englefield Avonville Residential Heritage Area. **Retention of this key scheduled building could involve a PPP between council and eg Box 112 who are ‘... investors, developers, constructors ...’ and Christchurch City Council.**

(Refer to separate PDF: extract from 1 March 2023 CCT Deputation to CCC on PC 13, Englefield and Daresbury)

- **Barnett Avenue Pensioner Cottages:** CCT is disappointed that Christchurch’s (and the nation’s) very first city council-provided pensioners’ rental accommodation complex, the Barnett Ave Pensioner Cottages, is not on the revised Schedule. CCT had earlier argued that it should be and continues to believe that the ‘conserve and upcycle’ concept for buildings – good for heritage and good for the environment – could be applied. Appropriate earthquake strengthening of the remaining buildings (which survived the quakes relatively well and were rated at approximately 41% NBS in 2014), retrofitting of double glazing, installation of efficient heating systems and so on, along with appropriate internal remodelling, could well be competitive with demolition and new-build financial and environmental costs. An opportunity to celebrate the uniqueness of this building complex is in danger of being totally lost.

#### **4. The provisions of the CDP in relation to heritage in a climate change (global heating) emergency.**

- In 2022 CCT and HPC contested a resource consent application by Canterbury Jockey Club for demolition of the Grand National Stand at Riccarton Park. Many ideas for adaptive reuse were offered. However, in our view, the Commissioner (and Council Heritage staff) placed undue emphasis on just **one** of five heritage criteria: ‘**iii. whether the costs to retain the heritage item (particularly as a result of damage) would be unreasonable.**’ In

fact, the costs to repair damage were relatively modest. The high seismic strengthening costs which were cited by the applicant were by far the major 'problem'. No consideration at all was given to the effects of demolition on the wider environment and climate change (global heating).

- CCT considers it imperative that an energy consumption and emissions 'whole of life' audit be undertaken for building projects to establish costs to the environment of energy consumption and CO2 emissions. Such audits should automatically accompany claimed QR costs of new buildings; and demolition costs should be included in an assessment of the financial costs of any project. In the GNS case, CCT and HPC had to request that such a figure be provided. An 'estimate' only of the cost of demolition was eventually provided by the applicant

## 5. Appendices

### Appendix A Hagley Park

#### Comment about Hagley Park (CCC Scheduled Highly Significant heritage item) in relation to PC 13 Heritage

**The Hagley Park Management Plan 2007 clearly states:**

From P3

Under the heading '**STRATEGIC OBJECTIVES**', one of the stated objectives is:

- *To investigate the potential provision in the City of Christchurch City Plan of a special conservation zone around Hagley Park to protect the integrity of the visual landscape character of the park.*

From P22

Under the heading '**Part A: Hagley Park Landscape Character Analysis**' and under the subheading '**Expressions**':

*(ii) Open Space*

*... A wide skyline is an important element of the experience one has in the larger open space areas within the Park. Therefore, it is desirable, on landscape grounds, that this is not further intruded into on the perimeter of the Park by tall buildings on adjacent land.*

---

## **PART II POLICIES**

From P78



## 2.0 OPEN SPACE COMPONENT

**OBJECTIVE 2:** *To protect the open spaces of Hagley Park and the visual amenity of the road users. To promote Hagley Park as a major feature of the open space system of the inner city.*

**POLICY:** *2.3 A study shall be carried out in conjunction with neighbourhood studies to identify opportunities and develop proposals to reinforce the linkages that exist between Hagley Park and the city. Comment: The Avon River and roading network offers considerable opportunity to extend the features of the Park into the surrounding city.*

*2.4 Roadway design and construction in the vicinity of Hagley Park shall take the character of the Park into consideration and reinforce the Park boundary. Comment: For example, trees are a major feature of Hagley Park that can be incorporated into the surrounding roadways.*

- **Since the HP Management Plan was written in 2007, much has happened to interrupt the proposed study (under Policy: 2.3 above) and the expected review of The Plan 10 years after its commencement. However, what has been achieved post-earthquakes is the 2015 inclusion of Hagley Park on the CCC Schedule as a Highly Significant item. This makes the case for careful control of intensified housing in the Hagley Park (near) environs all the more important, notwithstanding the approval in 2021 of the Ryman Healthcare development on its Bishopspark and Peterborough sites. Note that heights approved by the two Commissioners were considerably above permitted Christchurch District Plan limits: Bishopspark site from 14 m to 19.5 m a 39.25% exceedance.**

**CCT calls for a defined Hagley Park buffer to be established in PC 13; and recommends that Hagley Park be included in PC 14 as a Qualifying Matter.**

## Appendix B Princess Margaret Hospital

**Housing intensification in a Climate Change (Global Heating) Emergency and the need to ‘recycle’ buildings: Princess Margaret Hospital buildings, a case in point.**

- **The Princess Margaret Hospital: although earthquake damaged, is the city’s only major surviving building complex of the period / style and is of great significance locally and more widely. Retention of this building complex is very important in cultural and environmental terms.**

- Second only to transport, construction and demolition (C&D) is the nation's largest producer of CO<sub>2</sub>: manufacture of materials: concrete, steel, glass – heavy energy consumption and CO<sub>2</sub> emissions; heavy freight transportation (non-renewable energy consumption, CO<sub>2</sub> emissions). This stage is often preceded by demolition of existing structures (a part of the cycle which is also heavy in energy consumption, high CO<sub>2</sub> production). These structures have already been in part responsible for creating first-stage emissions as already outlined. Note that the CO<sub>2</sub> produced during the building of a structure 50 years ago and even up to 100 years ago is still present in the atmosphere.
- As well as the above, C&D accounts for approximately 40% of hard fill waste disposal in New Zealand refuse stations.
- What is needed in the rush to intensify housing is careful research and analysis into the environmental costs of precipitate demolition of existing buildings – dwellings, multi-block structures and public, commercial and Industrial buildings – which, with suitable remediation, are capable of meeting housing needs. Clear financial benefits can also occur with such existing buildings, which are often situated in or near the centre of the city. With suitable seismic strengthening and adaptive design work, there exists considerable capacity for the housing of individuals, families, communities. In comparison with a new build this can result in: significant reduction in emissions / energy use / landfill discharge; the achieving of a clear nett cost saving in dollar terms – not to mention retention of community and cultural capital.
- The Princess Margaret Hospital has a total floor space of 40,000m<sup>2</sup>, ie 4 hectares (10 acres). This historic (if not yet heritage) structure, although earthquake damaged, would be capable of remediation and re-purposing for the housing of a significantly-sized community, while fulfilling a 'centre of local community' need. It is a long-established icon of the lower Cashmere environs and could continue in a mixed-use residential, commercial, health, cultural and social role with perfect access to Cashmere High School, Pioneer Stadium and numerous easily accessible outdoor recreation and pursuits opportunities.
- CCT offers the suggestion that Ngāi Tahu, as tangata whenua, be invited to explore the idea of establishing a new marae on this site, possibly even within the building. This could also greatly enrich the community itself.
- Efficient existing public transport servicing and plentiful on-site parking are also attractive components of this adaptive reuse proposition.

- The demolition of PMH would result in an enormous loss of embodied energy and, given its reinforced concrete brick-clad construction, extremely high demolition costs (\$ cost and climate change cost). To then build housing structures of at least three storeys on the site would increase these various costs greatly.
- Using CDP data (minimum of 30 households / hectare) it would appear that retention, strengthening and re-purposing of the Princess Margaret Hospital building complex could result in accommodation for at least 120 households on this site – approximately 400 residents. The environmental cost to achieve this would be low (energy consumption and emissions) and the financial cost could be below that of demolition and rebuild for the equivalent housing numbers and provision of community facilities.

(Refer to separate PDF, 'There's No Place Like Old Homes; Re-use and Recycle to Reduce Carbon' kindly supplied by Nigel Gilkison, Chair Timaru Civic Trust)



Extract from 1 March 2023 CCT Deputation to CCC on PC 13 Heritage: Englefield and Daresbury

1973 *The Press, Saturday March 15, 1980 p3* promise may save Englefield



By FELICITY PRICE Thomson, who brought it to our attention this week.

A promise made by the Christchurch City Council seven years ago may save the historic Englefield home-stead in Avonside, from demolition.

In July 1973, "The Press" printed a picture of fourth-form pupils of Avonside Girls' High School standing in front of Englefield, with a caption saying that the girls had "saved the old house from being demolished to make way for a motorway."

"The girls sent a petition to the Prime Minister (Mr Kirk) which resulted in a promise by the Christchurch City Council to preserve the historic property, which was built in 1856 by one of the founders of the Canterbury settlement, William Guise Brittan."

When first spoken to yesterday about the 1973 undertaking the Mayor (Mr H. G. Hay), said he had never heard of it. He was not the only one. Although the original story about the schoolgirls' petition and the council's consequent promise was originally recorded in "The Press", it was a Cashmere reader, Mr A. D.

Thomson, who brought it to our attention this week.

In response to a feature story in "The Press" last Wednesday about Englefield and the possibility that it may still be demolished to make way for the Avonside-Woodham expressway, Mr Thomson wrote in to give a few more details about the history of the house. He mentioned the 1973 picture at the end of his letter.

After Mr Hay had obtained a copy of the 1973 picture and caption, he said that so far as he was concerned he would support preservation of Englefield.

"If the council of 1973 made an undertaking that the building would be preserved, then preserved it must be," he said. "I believe that if the promise was made then we've got to honour it."

Mr Hay said he was only the Mayor and not the whole council: the final decision would have to be made by the full council and not himself alone.

It did not matter that the pledge to save the building had been made by a Labour council.

"It was a decision made by the whole council and, as such, it should be binding."

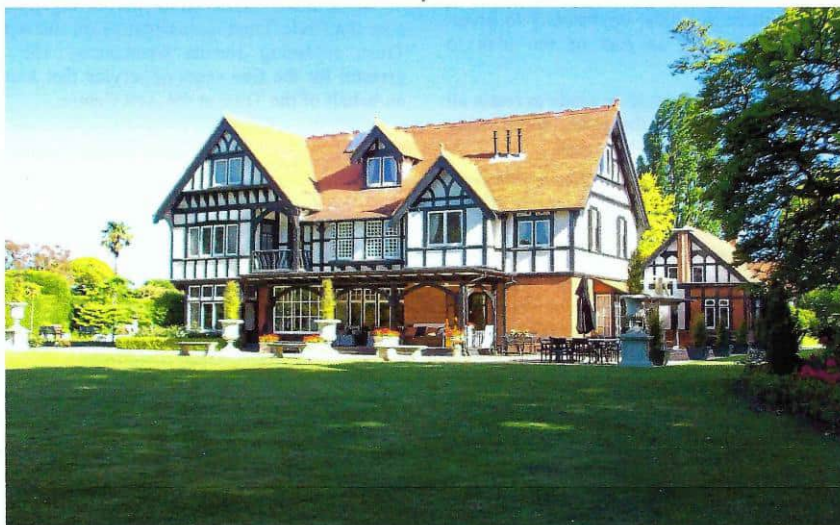
The petitioners from Avonside Girls' High School outside Englefield in 1973.



# Newsletter

NOVEMBER 2010

## CIVIC TRUST AWARDS



Daresbury, 67 Fendalton Rd - Awarded a Supreme Award



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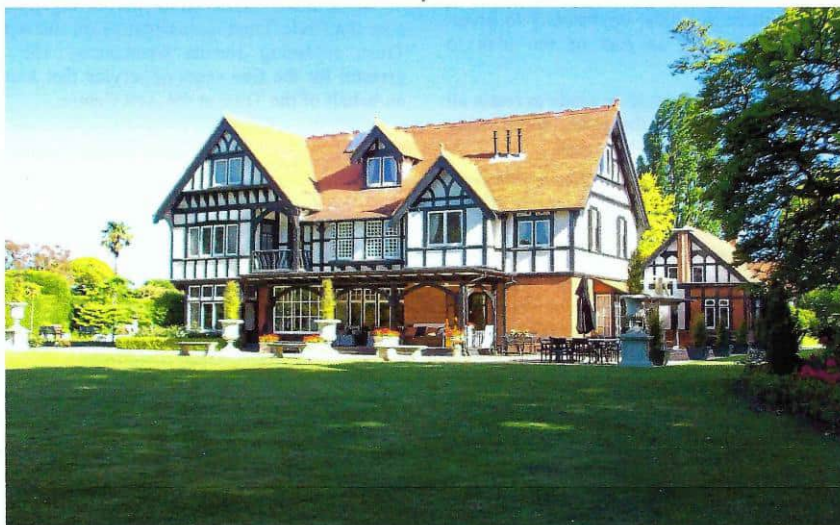
The petitioners from Avonside Girls' High School outside Englefield in 1973.



# Newsletter

NOVEMBER 2010

## CIVIC TRUST AWARDS



Daresbury, 67 Fendalton Rd - Awarded a Supreme Award



## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 12/05/2023

**First name:** Helen **Last name:** Broughton

**Organisation:** Waipuna Halswell-Hornby-  
Riccarton Community Board

**On behalf of:** Waipuna Halswell-Hornby-  
Riccarton Community Board

**Postal address:**

**Suburb:**

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8154

**Daytime Phone:** 0276404935

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
Waipuna Halswell-Hornby Riccarton Community Board PC13- email
Final - Draft Heritage Plan Change 13 Submission

**Mulder, Andrea**

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**From:** Collins, Faye  
**Sent:** Friday, 12 May 2023 4:17 pm  
**To:** Engagement  
**Cc:** Broughton, Helen  
**Subject:** WAIPUNA HALSWELL HORNBY RICcarton SUBMISSION ON PLAN CHANGE 13  
**Attachments:** Final - Draft Heritage Plan Change 13 Submission.pdf

Good afternoon,

Please find attached the community Board's submission on Plan Change 13 -Heritage.

## Faye Collins

### Community Board Adviser

Comm. Governance Team (Hal-Hor-Ric)



03 941 5108



[faye.collins@ccc.govt.nz](mailto:faye.collins@ccc.govt.nz)



Rārākau: Riccarton Centre, 199 Clarence Street



PO Box 73022, Christchurch 8154



[ccc.govt.nz](http://ccc.govt.nz)

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**Christchurch**  
City Council 

## Proposed Heritage Plan Change (PC13)

### Waipuna Halswell Hornby Riccarton Community Board

#### **1 Introduction**

- 1.1. The Board recognises that the proposed Heritage Plan Change (PC13) (“the Plan”) is notified alongside the Housing and Business Choice Plan Change (PC14) that aims to address population growth, housing issues, including affordability, and climate change and to bring the District Plan in line with government direction given via the National Policy Statement-Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (“the Act”) to enable more development in the city’s existing urban footprint by allowing higher height limits within and around the city centre and suburban commercial centres.
- 1.2. The Board notes that Plan Change 13 Heritage identifies eleven proposed Residential Heritage Areas with buildings and features that are collectively significant to the city’s heritage and identity and also introduces a buffer for Residential Heritage Areas that have a high-density border, to better protect their edges. It is also proposed to add around 60 heritage buildings or items and building interiors to the Schedule of Significant Historic Heritage protected under the District Plan. As with existing scheduled buildings and items, these will require a resource consent for significant changes such as building alterations, relocation, or demolition. Both Residential Heritage Areas and additional buildings and items being added to the schedule for protection are proposed to be Qualifying Matters.

#### **2 Submission**

The Submission covers the following four aspects regarding Plan Change 13:

1. The Board is supportive of the proposal to protect residential character and heritage areas identified in the Plan, but considers there are other examples of areas with similar character to the areas proposed that should be identified in the Plan including areas of Hornby, South Hornby, Sockburn, Hei Hei, Islington, and Broomfield.
2. Support the proposed buffer between Residential Heritage Areas, bordering high density areas, but argues that a buffer is equally needed between the individual heritage buildings and items that are to be permitted in either high or medium density residential zones. The Board considers that developments of this scale could well detract from the value of these individual heritage buildings. The Board advocates for a buffer between individual heritage properties and higher or medium density developments.
3. Heritage settings need to be defined as meeting the significance threshold. The Council’s policy on heritage does not regard significant heritage settings as meeting the threshold. The Board understands other Councils do include heritage settings as being worthy of protection. (The Board will provide policies from other Councils at the hearing).

The Board considers that one example of a significant heritage setting is the foundation borough of Christchurch, Riccarton:

- The original cottage on the site is the first cottage of European settlement in Canterbury.
- Ngai Tuahiwi had a pa in the area before the Europeans arrived.
- Riccarton Bush Is of National importance, as it is the only remaining example left of the indigenous forests of the plains- it is over 600 years old.
- Riccarton House is highly significant and retains its heritage interior.
- The original farm buildings.
- The historic Kahu Road bridge.
- Christchurch Boys' High School and war memorial.

In the Board's opinion a larger area could be included from Mona Vale, to the Britten stables (possible heritage) to the war memorial at Jane Deans Close (see below). In the attached Residential Heritage Area template this area meets 11 of the possible 13 criteria for a Residential Heritage area. The Board fails to understand why critical heritage settings are not seen as significant.

4. It is important to acknowledge that if this is not done the above collection of historic items and other historic settings may be engulfed by inappropriate development. WSP, (the consultancy engaged by Council) provided a drawing of three story and six story development (to be provided at a later date).

The Board recommends that significant heritage settings should be defined as meeting the significance threshold. The only suggestion the Board makes regarding preserving a heritage setting is that the zoning for housing around the setting remain at current levels, either residential suburban or residential suburban transitional density.

### **3 Request for an additional heritage item to be added to the list**

- 3.1 The Board recommends inclusion of a war memorial, sited in Jane Deans Close, in honour of those who died in the 20th Battalion in World War 2. The 20th Battalion left from this area and served in Greece, Crete and North Africa from 1940 to 1945. A well-attended Anzac service is held at the memorial every year.
- 3.2 Jane Deans Close is named after the early Riccarton settlor and community leader, Jane Deans, who lived in Riccarton Cottage and Riccarton House with her son after the untimely death of her husband. The war memorial was erected soon after the street was formed around 1997 replacing the original 1948 memorial.
- 3.3 The Board notes that there is proposed to be a buffer between the Residential Heritage Areas bordering high-density areas. The Board agrees that a buffer for Residential Heritage Areas is needed, but argues that a buffer is equally needed between the individual heritage buildings or items and any bordering developments that are to be permitted in either high or medium residential zones. The Board considers that developments of this scale on neighbouring properties could well detrimentally impact and detract from the value of these individual heritage buildings. Therefore the Board considers that a buffer is also required between these properties and neighbouring higher or medium density developments.

#### 4 Conclusion

4.1 The Board requests that the matters set out above in relation to Plan change 13 be taken into consideration.

The Board would like to speak to its submission.



Helen Broughton

CHAIRPERSON Waipuna Halswell-Hornby-Riccarton Community Board

Dated 12 May 2023.



**Potential RHA Review Template**

Area Name -

Potential RHA's review criteria	Y/N	Notes
Moderate to high degree of authenticity and integrity		
Group of inter-related historic heritage places, buildings, structures and/or sites within a geographical area with clear boundaries that together address the interconnectedness of people, place and activities.	✓	
A comprehensive, collective and integrated place with coherent heritage fabric (not fragmented).		
Contains a majority of sites/building that are of defining or contributory importance to the RHA	✓	
Predominantly developed more than 30 years ago	✓	
Associated primarily but not necessarily exclusively with residential use		
Meets the minimum size for areas (one street block, one side of street/ minimum of approx. 15 properties)	✓	
Represents and embodies at least one of the heritage values in Appendix 9.3.7.1 at a significant or highly significant level: <ul style="list-style-type: none"> <li>• Historical and Social Significance</li> <li>• Cultural and Spiritual Significance</li> <li>• Aesthetic and Architectural Significance</li> <li>• Technological and Craftsmanship Significance</li> <li>• Contextual Significance</li> <li>• Archaeological and Scientific Significance</li> </ul>	✓	
Conveys/represents important aspects of the Christchurch District's cultural and historical themes and activities	✓	
Makes a significant contribution to the Christchurch District's sense of place and identity, and an understanding of its history and cultures.	✓	
Of heritage significance to the Christchurch District (and may also be of significance nationally or internationally)	✓	

## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 12/05/2023

**First name:** Rosie **Last name:** Linterman

**On behalf of:**

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Daytime Phone:**

I could not  
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I am not  
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 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:

Also happy to speak if someone else made the similar submissions.

### Attached Documents

File

Rosie Linterman

From: Rosie Linterman rosie.linterman@gmail.com

Date: 12/05/2023 at 11:43:18 AM

To: rosielinterman@gmail.com

Sent from my iPad

We have lived in Beverley Street for over 40 years having purchased a very rundown property at number 36. We have continually renovated and maintained the buildings and gardens (including appearing before the urban design panel to ensure we have maintained a sympathetic style in keeping with the council intentions)

Beverley Street, owners and residents have all very proudly maintained the character of the street in their renovations and repairs as they appreciate the special characteristics of the street.

There are outstanding examples of Christchurch's best early 20th century architecture, and most houses are constructed in the same materials and style, creating a distinctive character.

The properties have garages and off street parking which is a major asset in a very narrow street.

It would be a backward step to lose the opportunity to retain a collection of houses of character, and very established gardens of an era by allowing the character overlay to be lifted and possible multi storey developments to occur. Despite its location in St Albans the street does not flood, assisted no doubt by the high foundations and considerable planting. Flooding could become a concern with multi story building and effectively no gardens.

Christchurch is concerned to retain its image as a garden city and stop the loss of greenery for health and aesthetic reasons. The retention of the character overlay would ensure that the established trees and extensive planting in Beverley Street would continue to contribute to this aim.

We request that Beverley Street be designated as a residential heritage area to protect its special characteristics, as has been the purpose under its designation as a characteristic character over the area. (previously known as a SAM)





## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 22/05/2023  
**First name:** Wynn **Last name:** Williams  
**Organisation:** Mark Pee Limited  
**On behalf of:** Mark Pee Limited

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Daytime Phone:** 033797622

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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:

happy to present with others who made the similar submissions.

### Attached Documents

File
Lee Pee Limited 1
Lee Pee limited 2

22 May 2023

Mark Stevenson  
Christchurch City Council  
C/- Engagement Team  
Email: [engagement@ccc.govt.nz](mailto:engagement@ccc.govt.nz)  
Cc: [mark.stevenson@ccc.govt.nz](mailto:mark.stevenson@ccc.govt.nz);  
[megan.pearce@ccc.govt.nz](mailto:megan.pearce@ccc.govt.nz)

Dear Mark,

### Submission on Plan Change 13 to the Christchurch District Plan

1. We act for Lee Pee Limited (**Lee Pee**). Please find **attached** to this letter a submission on Plan Change 13 to the Christchurch District Plan made by Lee Pee.
2. Our client contact is overseas based and regrettably this submission is being made late due to only having instructions to prepare and file this submission confirmed late last week.
3. Lee Pee respectfully requests that the Council exercise its powers under section 37 of the Resource Management Act 1991 to accept the submission outside of the statutory time period for filing the submission.
4. Given that the summary of decisions requested has not yet been notified (and according to the Council's website this will only occur "around June-July 2023") there is no prejudice to any party in accepting this late submission as the submission will be able to be summarised and notified with the summary of submissions in the usual manner.
5. Please contact me if you have any questions in relation to the above.

Yours faithfully  
**Wynn Williams**



**Lucy de Latour**

**Partner**

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**SUBMISSION ON A NOTIFIED PROPOSAL FOR A POLICY STATEMENT OR PLAN,  
CHANGE OR VARIATION CLAUSE 6 OF SCHEDULE 1 OF THE RESOURCE  
MANAGEMENT ACT 1991**

**SUBMISSION ON HERITAGE PLAN CHANGE 13**

**Name of Submitter:** Lee Pee Limited (**LPL**)

**Introduction and Summary**

1. This is a submission on the Christchurch District Council (the Council's) Proposed Heritage Plan Change 13 (**PC13** or the **Plan Change**) to the Christchurch District Plan.
2. LPL could not gain an advantage in trade competition through this submission.
3. LPL **opposes** the listing of 137 Cambridge Terrace (Harley Chambers) in **Appendix 9.3.7.2** 'Schedule of Significant Historic Heritage' and seeks **deletion** of 137 Cambridge Terrace (Harley Chambers) from the Appendix.
4. The basis for opposition is that the respective Statement of Significance for Harley Chambers bears no reality to:
  - a. the condition of the building,
  - b. its seismic risk, and that
  - c. any endeavours to provide any purpose or function would be both financially unsupportable and result in the removal of residual heritage fabric to the extent that the building would not warrant scheduling.
5. Accordingly, the retention of 137 Cambridge Terrace within **Appendix 9.3.7.2** is not the most appropriate way to achieve **Objective 9.3.2.1.1** and **Policy 9.3.2.2.1**, and in particular **Policy 9.3.2.2.1(c)(i)** and **(ii)** as these relate to significance, integrity, engineering and financial reasonableness.

**Relief Sought**

6. LPL seeks to:
  - a. **Delete** within **Appendix 9.3.7.2** 'Schedule of Significant Historic Heritage' reference to the Heritage Listing (Building and Setting) for 137 Cambridge Terrace 'Commercial Building and Setting, Harley Chambers' Item No 78 and Setting No 309.
  - b. **Delete** changes to Rule 9.3.4.1.1 (P9) and proposed deletion of P11 and P12 and Matter of Discretion 9.3.6.1 proposed by PC13.
  - c. **Consequential amendments** to the planning maps to delete the notation for Heritage Listing and Setting as above from 137 Cambridge Terrace.
7. The specific relief is provided in **Attachment A**.

8. The reasons for the submission are that unless the relief sought in this submission is granted, then PC13, with respect to the Building and Setting at 137 Cambridge Terrace, will:
  - a. Not comply with the Council's obligations under the Resource Management Act 1991 (**RMA**);
  - b. Not promote the sustainable management of natural and physical resources;
  - c. Not be the most appropriate provision in terms of the protection of historic heritage from inappropriate subdivision, use and development in accordance with section 6(f) and section 5 of the RMA;
  - d. Not amount to the and promote the efficient use and development of resources;
  - e. Be inappropriate in terms of section 32 RMA.

### **Background and reasons**

9. Harley Chambers, 137 Cambridge Terrace is a three-level character building, with the northern portion originally dating from 1929, and the southern from 1934.
10. Until the 2011 earthquakes, the building was used for numerous small to medium size offices, primarily for medical and dental practice rooms.
11. The Canterbury earthquake sequence rendered the seismic compliance rating of the building at around 15% NBS.
12. The building has been unoccupied since February 2011, apart from a high level of vagrant and antisocial behaviour despite ongoing security efforts by the owner.
13. The building is notated as Significant in the Christchurch District Plan (Heritage notation 78 and setting 309) in the Christchurch District Plan.
14. LPL have owned Harley Chambers since 2001. LPL did not submit against the listing of Harley Chambers within the Christchurch District Plan as included as within the Stage 3 Proposal to the Christchurch District Plan.
15. LPL lodged a comprehensive resource consent to the Christchurch City Council in 2017 seeking to demolish Harley Chambers (and in connection with a partial retention of the adjoining Worcester Chambers) to facilitate a five-star Hotel complex. The application was withdrawn in 2018 given challenging world economic conditions, and the (then) staggered pace of Christchurch's recovery efforts.
16. The site location is shown on **Figure 1**. The southern elevation as taken from Worcester Boulevard is shown on **Figure 2**.

Figure 1: 137 Cambridge Terrace



Figure 2: Harley Chambers, Southern elevation. Photo facing north – Worcester Boulevard



17. Detailed assessments provided to the Council, associated with the 2017 Resource Consent application, identify the following:
 

*Structural integrity*
18. The building has been assessed to have a seismic strength of 15% NBS, and is accordingly considered to be earthquake prone having a seismic strength of less than 34% NBS.
19. Critical structural weaknesses include:
  - Unreinforced brick parapets;
  - Unreinforced brick lift shaft above second floor level (partially deconstructed)
  - Unreinforced brick and bell block exterior walls.



- Severely damaged column at the north-eastern corner.

#### *Historic Heritage*

20. Whilst there is no dispute of the pre-2011 heritage recognition of the building, overall, Harley Chambers is now only of “Some” and limited significance, given the combination of considerable alterations undertaken within the fabric of the building since its construction, the damage caused by Canterbury earthquake sequence, and also subsequent damage caused by squatters despite the considerable efforts by the building owners to exclude access.

#### *Engineering*

21. Works to ensure a robust seismic rating of 66% NBS or above are feasible in terms of engineering solutions. However, these solutions as identified are extremely invasive upon existing residual heritage fabric.

#### *MBIE - Earthquake Prone Register*

22. In December 2017 MBIE added Harley Chambers to the register of Earthquake Prone Buildings (**EPB Register**) with a recorded earthquake rating of 0% to less than 20%. The deadline for completing seismic work on the notice is 14 June 2025.

#### *Costs of Repair (2017)*

23. The costs of the structural repair of Harley Chambers to increase its seismic rating are estimated as follows: to 34% of the required New Building Standard (NBS) \$12.8 million; to 67% of NBS, \$17.070 million; and to 100% of NBS \$18.790 million.
24. In this context it is important to note that the Independent Hearings Panel on the Christchurch District Plan raised concerns with the Council’s approach to the Statements of Significance and associated listings in **Appendix 9.3.7.2**.
25. In Decision 45 which resolved the Heritage Provisions of the Christchurch District Plan, the Independent Hearings Panel (**IHP**) raised issues as to the Council’s notified provisions associated with protection of Historic Heritage<sup>1</sup>. In particular, concern was raised as to the manner in which the notified objectives and policies did not take proper regard of the *“the impacts of the Canterbury earthquake sequence, the financial costs of repair and reconstruction of heritage items, and related to that, the engineering complexity of repair, reconstruction and seismic strengthening.”*
26. The IHP also released a Minute leading up to Decision 45<sup>2</sup>. The relevant consideration to this issue is:

*[17] In addition, the Council’s s32 evaluation did not involve any structured or formal evaluation, in consultation with landowners, or engineering feasibility and / or financial or economic viability issues. As we shortly address, the evidence we have heard on those matters for various submitters has informed our view that several listings should be deleted or modified. However, we have only had insight into a small sample of listings brought to our attention by submitters. Given the various considerations we have noted, this significant weakness in the listings in the Notified Proposal needs to be addressed in both policies and rules so as to ensure all landowners (whether or not submitters) will have a fair capacity for relief. We return to this matter shortly.*

<sup>1</sup> IHP Decision 45 – Paragraph 32.

<sup>2</sup> Hearing Panel Minute Regarding Topics 9.1 – 9.5, 22 February 2016.

[18] *Those problems have their consequences for the Notified Proposal. One consequence concerns the reliability or otherwise of the heritage list in the Notified Proposal, given the quality control matters we have identified...*

27. Decision 45 then states:

[63] *We have also included express acknowledgement that in some situations demolition of heritage items is appropriate. This is now expressly recognised in the provisions through recognition of financial and engineering factors and is consistent with our findings to s6(f), discussed at [10] – [15] above.*

[99] *We find that there is no statutory presumption that ‘demolition’ will be inappropriate, or that it requires avoidance in an absolute sense. In the Christchurch recovery context, there is a need for overall flexibility in the appropriate management of historic heritage. Policy 9.3.2.9 does not sit alone. It is one of the matters that sits under Policy 9.3.2.4. We find that the list of matters in Policy 9.3.2.9, are relevant considerations for ensuring whether demolition is appropriate. On the evidence we find the listing of these matters is particularly important for the proper consideration of applications for complex restoration or rebuilding projects involving historic heritage. As we discuss below in the context of Christchurch Cathedral, demolition can take a number of forms. It does not always mean the loss of an entire building to make way for a new and modern building. There are a range of factors that affect how much demolition is required. All of those matters are recognised in the Final Revised Version. However, we find that the policy still inappropriately framed these factors as ‘exceptions’, notwithstanding the Council’s movement away from the phrase ‘exceptional circumstances’. In the Christchurch context, we find that there should be no presumption that ‘demolition’ is inappropriate or that it must be avoided, or only allowed in limited circumstances.*

28. The relevance of these matters to this submission is that whilst LPL did not ‘test’ the listings during the Proposed District Plan process by lodging a submission then, LPL with the analysis gained through its 2017 resource consent application considers that the Statement of Significance for 137 Cambridge Terrace is fundamentally flawed and cannot be justified. The inclusion of the Building on the MBIE EPB Register with seismic works or demolition to be completed by June 2025 would result in the further loss of residual heritage fabric of significance, and require an extensive and costly resource consent application. Accordingly, retaining Harley Chambers within **Appendix 9.3.7.2** cannot be considered as the more appropriate provision in terms of achieving the purpose of the RMA.
29. Accordingly, Plan Change 13 which is broadly set in terms of Historic Heritage, including the listing and delisting of a number of buildings from **Appendix 9.3.7.2** provides an appropriate mechanism whereby the Christchurch City Council, as informed by the 2017 assessment should have reconsidered and updated the technical inputs into the Schedule of Significance for 137 Cambridge Terrace, with the resultant delisting of the building and setting.
30. The purpose of this submission is to engage in the formal process to seek that delisting.
31. LPL also wishes to reserve its position to make further representations either by way of Further Submissions or should the provisions of PC13 alter or evolve through the course of the plan change process.
32. LPL wishes to be heard in support of this submission.
33. If others make a similar submission, LPL would consider presenting a joint case with them at the hearing.

**DATED** at Christchurch this 22nd day of May 2023



.....

Signature of person authorised to sign on behalf of Lee Pee Limited

Address for service of submitter:

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Wynn Williams  
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## Attachment A

ID	Section of Plan	Support/ Support in Part/Oppo se	Reasons	Relief Sought								
<b>Chapter 9 - Appendix 9.3.7.2.</b>												
1.	<b>Appendix 9.3.7.2.</b>  <b>Schedule of Significant Historic Heritage</b>	Oppose	As set out above. The Statement of Significance is fatally flawed and does not allow for damage and loss of function as a consequence of the Canterbury Earthquake sequence.	<table border="1" data-bbox="1099 644 2175 735"> <tr> <td data-bbox="1099 644 1155 735">137</td> <td data-bbox="1155 644 1272 735">Cambridge Terrace</td> <td data-bbox="1272 644 1435 735">Central City</td> <td data-bbox="1435 644 1749 735">Commercial Building and Setting, Harley Chambers</td> <td data-bbox="1749 644 1850 735">78</td> <td data-bbox="1850 644 1955 735">309</td> <td data-bbox="1955 644 2085 735">Significant</td> <td data-bbox="2085 644 2175 735">3111 Catego 2</td> </tr> </table>	137	Cambridge Terrace	Central City	Commercial Building and Setting, Harley Chambers	78	309	Significant	3111 Catego 2
137	Cambridge Terrace	Central City	Commercial Building and Setting, Harley Chambers	78	309	Significant	3111 Catego 2					
2.	<b>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</b>	Oppose	There are several heritage buildings within Christchurch which remain significantly damaged and vacant because of the various Canterbury earthquakes. The Operative Christchurch District Plan ("Operative Plan") specifically provided Rules and Matters of Discretion relating to the upgrade, replacement, reconstruction, restoration, alteration, and relocation of a heritage item.	<b>Delete</b> the PC13 proposed changes to Rule 9.3.4.1.1 (P9) and proposed deletion of P11 and P12 and Matter of Discretion 9.3.6.1.								

ID	Section of Plan	Support/ Support in Part/Oppo se	Reasons	Relief Sought
			<p>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.</p>	
3.	<b>Plan Maps</b>	Oppose	<p>Consequential amendments to Heritage notations removing the listing from <b>Appendix 9.3.7.2.</b></p>	<p><b>Delete</b> the notation of a Heritage Listing and Setting from the Planning Maps for 137 Cambridge Terrace.</p>