

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

## Submitter Details

**Submission Date:** 03/05/2023

**First name:** Amanda **Last name:** Parfitt

**Preferred method of contact** Email

**Postal address:** 70 Rowley Avenue

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**Country:** New Zealand

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

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

Note to person making submission:

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 01.1

- Support
- Oppose
- Seek Amendment

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

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

Please change the Qualifying Matter for Sunshine Access in all medium (and lower) density residential zones to ensure sunlight access to ground floor for all 12 months of the year. If Sunlight Access is going to be less than this, I request that this require a resource consent which requires permission from the owners and occupiers of the neighbouring properties.

**My submission is that**

I appreciate that CCC have considered the different sun angle in a Christchurch winter as well as our colder climate compared to

Auckland and created a Sunlight Access Qualifying Matter. However, I don't think that the Qualifying Matter goes far enough. I believe that in medium density residential zones, sunlight access should be assured to ground floor all 12 months of the year.

In not ensuring ground floor sunlight access in these zones, you are denying disabled and elderly people (who can generally only live on the ground floor or single level building) from a natural source of light and heating. It is well known that a lack of exposure to sunlight in winter months can contribute to depression, to which these groups are already vulnerable. You are also increasing their heating costs, of which they often already struggle to pay for.

Additionally, even less vulnerable people who have purchased a home which has had sun on the ground (or only) floor should also expect to be able to keep this level of sunshine in their home if their neighbours choose to intensify their property. They should not have to sell their property and purchase another one in order to maintain sun levels in their homes and yards (on decks for example). People who are renting often have even less choices in these situations!

Winter sunshine is so important to the wellbeing of the people who live in Otautahi!

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#### Attached Documents

File
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No records to display.

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

## Submitter Details

**Submission Date:** 03/05/2023

**First name:** TREVOR **Last name:** WILSON

**Preferred method of contact** Email

**Postal address:** PO Box 22264

**Suburb:**

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8140

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**Daytime Phone:** 021905400

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

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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.

Additional requirements for hearing:

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 02.1

- Support
- Oppose
- Seek Amendment

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

I request the proposed MRZ be extended to incorporate parts of Hollis & Bowenvale Aves. and Lansdowne Tce. including Roseneath Place that are within walking distance, or 1km, of Centaurus Rd. and access to the Orbiter bus route.

**My submission is that**

The writers of PC14 have been inconsistent with their proposed change to Medium Residential Zone (MRZ) and in particular to the lower slopes of Cashmere Hills. The proposed planning map shows areas around Hollis & Bowenvale Aves and Lansdowne Tce remain zoned Residential Hills (RH) because of apparent limited availability to public transport, when areas around Dyers Pass Rd. have the same, if not greater, public transport limits but are being re-zoned MRZ.

## Attached Documents

File
No records to display.

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

## Submitter Details

**Submission Date:** 03/05/2023

**First name:** Steve **Last name:** Petty

**Preferred method of contact** Email

**Postal address:** 58 McBeath Avenue

**Suburb:** Hoon Hay

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8025

**Email:** stephen.t.petty@outlook.com

**Daytime Phone:** 0210601215

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

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Yes

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## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 03.1

- 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***

A better sol'n is:

In the rebuild in town you can PLAN this sort of housing.

In the new housing areas on the outskirts of town the same.

And stop allowing people to carve up rural land into 10 acre, 20 acre, etc life style blocks.

**My submission is that**

Given someone will be able to build a 3 storey multi residential block next door:

It will reduce my sun, especially in winter. Leading to a colder, wetter house and section. It will be depressing, lead to poor well being, and simply not a nice place to live. It will drop the value of my property. This comes on top of earthquakes, fights with EQC and insurance companies for many. Also comes on top of the fact that the council cannot/will not fix the flooding issues, which will deteriorate as climate change gets worse.

It will reduce privacy.

Increase noise from people, dogs, cars.

Increase in cats knocking off our bird life.

Less green space, less trees & bushes, not good for climate change.

Streets full of cars because there will not be enough off street parking on those redeveloped sections.

People living on top of one another, end up stuck inside. People need space, green space.

It is retrospective legislation that people did not buy into in the first place.

Gov't has not talked to the people first, but are simply dictating to us, and hand the councils the dirty job of implementing.

Of course I will not be voting for Labour nor National in the coming elections. (I understand they are the parties responsible).

People are getting tired of dictatorial Gov't, Public Services, councils. Falling public engagement. 1 in 4 don't vote at national elections, 1 in 5 didn't fill in the census, less than 50% vote at local body elections.

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Attached Documents

File
No records to display.

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

## Submitter Details

**Submission Date:** 03/05/2023

**First name:** David **Last name:** Hawke

**Preferred method of contact** Email

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** secretary.HRA@gmail.com

**Daytime Phone:** 02108540215

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

Additional requirements for hearing:

No additional requirements

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 04.1

- 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. Prioritise intensification in the central city and on former industrial land along the rail corridor
2. Mandate rainwater harvesting with all developments under this plan change

**My submission is that**

1. The Plan Change needs to prioritise intensification in the central city so it happens before the suburbs.
  - a. Revitalising the central city is a stated objective of the plan change (Objective 3.3.9).
  - b. Even though the 2010/2011 earthquakes were a decade ago, substantial undeveloped areas remain in the central city.
  - c. Given the importance of the central city as an employment, cultural and recreational hub for Christchurch, it makes sense to have as much residential development as possible there.
  - d. As well as earthquake sites, there are extensive undeveloped areas in the central city. These include the bus depot at Fitzgerald/Ferry/Moorhouse, the former Christchurch Women's Hospital site, and areas along the rail corridor. As well as this, further land will become available as Te Pūkenga sells off land close to its Madras Campus.
  - e. In a recent conversation with our MPs, we asked if central government might promote this prioritisation. In response, Megan Woods MP said that local government has the levers and it is up to local government to use them. We ask you to do exactly this.
2. The Plan change needs to mandate rainwater harvesting, to minimise impact on the stormwater network.
  - a. At a staff briefing for Spreydon-Cashmere-Heathcote Community Board, council staff noted the impact on stormwater volumes and that systematic upgrading of the stormwater system will be needed. This programme will be both expensive and long-running.
  - b. To minimise this impact (and to make better use of our water resources), the Plan Change needs to mandate on-site rainwater harvesting.

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Attached Documents

File
No records to display.



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## Submitter Details

**Submission Date:** 03/05/2023

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

**Preferred method of contact** Email

**Postal address:** 21 Church Square

**Suburb:** Addington

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8024

**Email:** addingtonhistory@xtra.co.nz

**Daytime Phone:** 0273793532

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Additional requirements for hearing:

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 05.1

- 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*

Put the above in place.

**My submission is that**

Available Infrastructure might not always support intensification and intensification should be restricted until required infrastructure is in place.

Subdivisions should have at least one compulsory car park on each development for deliveries, tradesmen and emergency services .

Areas of higher density should provide residents with access to public green spaces within a distance of no more than one kilometer.

**Original Submitter:****Original Point:**

**Points:** 05.2

- 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**

Natural hazards must be allowed for, or the CCC could face legal redress for allowing higher density in the wrong places.

**Original Submitter:****Original Point:**

**Points:** 05.3

- 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*

Put the above measures in place as Qualifying Matters.

**My submission is that**

Qualifying matters are needed to protect existing residents from losing their sunlight and warmth.

Putting 2 & 3 story buildings next to some existing properties with solar panels could negate the usefulness of said panels through shading.

Accessory buildings should not be allowed to be built on or near property boundary line, if maintenance of such buildings would necessitate the owner going on to next door property to facilitate such repairs.

As well as tree canopy cover rules, something should be done to prevent developers from clearing every tree on a site before they apply for a building consent. Often, the established trees removed by the developer are not replaced with trees that will eventually grow to the same size.

**Original Submitter:****Original Point:**

**Points:** 05.4

- Support
- Oppose
- Seek Amendment

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

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

Properties along the Brougham Street Expressway andnbsp; ( between Waltham Road and Barrington Street ) should be restricted from higher density, as there are already problems with traffic entering and exiting this main traffic corridor from the properties opening on to it.- and traffic is expected to increase over the next 20 years.

**My submission is that**

The Spine and other traffic corridors need to have restrictions on the amount of intensification along it, if the result will be that more traffic will flow from properties along it, on to an already overloaded transport route.

**Original Submitter:**

**Original Point:**

**Points:** 05.5

- Support
- Oppose
- Seek Amendment

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

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

Put in a clause which allows the Council to add additional Qualifying Matters in the future, should something come up later , which has not yet been thought of.

**My submission is that**

Heritage needs protecting, or it will be lost forever.

**Original Submitter:**

**Original Point:**

**Points:** 05.6

- Support
- Oppose
- Seek Amendment

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

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

Please consider the potential loss of amenity for existing house owners.

**My submission is that**

Existing amenity should be protected at the same time as intensification is encouraged.

Loss of sunlight and warmth from the sun on a property, through being overshadowed by a larger building being built next door, is akin to a seat being reclined by the passenger in front of you on a plane. There is a sense of loss of something you believed you were entitled to have.

With a long term plan, people will know to consider the intensification potential of their neighbours' properties when they buy a property, They can vote with their feet, by buying in an area which has the right sunlight availability for them

Attached Documents

File
No records to display.

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

## Submitter Details

**Submission Date:** 03/05/2023

**First name:** Emma **Last name:** Wheeler

**Preferred method of contact** Email

**Postal address:** 64 Windermere Road

**Suburb:** Papanui

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8053

**Email:** emma.bell@xtra.co.nz

**Daytime Phone:** 021523504

I could not  
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Yes

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## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 06.1

- Support
- Oppose
- Seek Amendment

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

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

Make both St James Avnue and Windermere Road category 1 Streets, protecting both the plaques, trees and the people the already enjoy and use these streets. Removing both streets from the intensification plan.

**My submission is that**

I would like both St James Avenue and Windermere Road to be removed from the housing intensification plan.

With the recent rebuild and extension of the Budda Rest Home and the expansion of Te Ora Hou Otautahi, traffic has significantly increased and parking has decrease.

It also needs to be taken into account that many parents park at the beginning of Windermere Road and St James Avenue at the beginning (8:15am – 8:40am) and the end (2:45pm-3:30pm) of the school day, children walk and scooter along Windermere Road both to and from school.

The planned housing intensification would only increase the traffic flow eve more and could make the streets a hazard.

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

## Submitter Details

**Submission Date:** 03/05/2023

**First name:** Emma **Last name:** Wheeler

**Preferred method of contact** Email

**Postal address:** 64 Windermere Road

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**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8053

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Yes

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## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 06.2

- 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***

Make both St James Avnue and Windermere Road category 1 Streets, protecting both the plaques, trees and the people the already enjoy and use these streets. Removing both streets from the intensification plan.

**My submission is that**

We support the protection of the war memorial streets. New Zealand men and women sacrificed their lives to defend Aotearoa.

Freedom and stability in this region are a luxury Kiwis have enjoyed for some time, but let's not kid ourselves, it has come at a cost which cannot be measured and certainly should not be forgotten.

It would be all too easy to rezone our war memorial streets to suit the current fashion of urban intensification, this we understand, but in the rush to reinvent the wheel should we pause and genuinely reflect the price of freedom we have today?

Respect for the fallen should not be taken lightly nor be politicised. These are war memorial streets which belong to proud Cantabrian's who remember.

Lest we forget.

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#### Attached Documents

File
No records to display.

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

## Submitter Details

**Submission Date:** 03/05/2023

**First name:** Mitchell **Last name:** Cocking

**Preferred method of contact** Email

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** mitchell.cocking@outlook.com

**Daytime Phone:**

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## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 07.1

- Support
- Oppose
- Seek Amendment

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

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

Reject the plan changes forced upon Christchurch by Wellington politicians. As a ratepayer I would rather you stood up to them and said no and let them appoint someone to ruin the city if that's what they want.

**My submission is that**

I don't support the plan changes as the increased intensification outside the inner city is unnecessary and



unwarranted. There are significant inevitable negative impacts of this policy including:

- Loss of sunlight and privacy to neighboring properties.
- Loss of tree cover
- Loss of heritage character.
- It allows develop which is not conducive to family living and will force families out of the city.
- Some communities will be impacted worse than others.
- There are not enough rules around good development that ensures it will produce outcomes that are good for people living in the high intensity housing. Development is currently profit driven leading to poor outcomes.

There is no evidence to suggest this level of intenisty is required in Christchurch but rather it has been and ideologically and politically driven change from Wellington politicians that do not understand Christchurch.

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#### Attached Documents

File
No records to display.

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

## Submitter Details

**Submission Date:** 03/05/2023

**First name:** Amie **Last name:** Cocking

**Preferred method of contact** Email

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** amie.cocking@gmail.com

**Daytime Phone:**

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## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 08.1

- 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***

Reject the rule changes that allow for higher intensity residential development

**My submission is that**

I oppose any changes that will make it easier to increase residential intensity outside of the inner city (four avenues).

There are significant inevitable negative impacts of this policy including:

- Loss of sunlight and privacy to neighboring properties.
- Loss of tree cover
- Loss of heritage character.
- It allows develop which is not conducive to family living and will force families out of the city.
- Some communities will be impacted worse than others.
- There are not enough rules around good development that ensures it will produce outcomes that are good for people living in the high intensity housing. Development is currently profit driven leading to poor outcomes.

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

## Submitter Details

**Submission Date:** 03/05/2023

**First name:** Lauren **Last name:** Roberts

**Preferred method of contact** Email

**Postal address:** 6 Neave Place

**Suburb:** Hillmorton

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8025

**Email:** kowhai1989@gmail.com

**Daytime Phone:** 0273190763

I could not  
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Additional requirements for hearing:

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 09.1

- Support
- Oppose
- Seek Amendment

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

6 Neave Place, Hillmorton

**My submission is that**

I support the proposed changes especially

## 8.2.2.2

bi) a variety of allotment sizes to cater for different housing types and affordability;

I am 34 years old, a professional on a good salary, am actively involved in my community and currently going through a separation. I would like to stay within my community but there are limited housing options available for single people who wish to own their own home. Many of my friends who have not been able to find partners are penalised because they are single as they do not have the financial means to buy a home. Although I will have a good deposit on a new house if we sell the current house, this will still not be enough due to cost of housing these days. Me and my ex-partner would like the opportunity to stay within our community (where we have been for 6 years). I feel that single people are often overlooked when planning for housing needs and that we are part of the variety that these changes will help cater for.

It is good to see that there could be more flexibility on allotment size as there is lost potential to infilling. Currently our 1970's house sits on 800m<sup>2</sup> section and the back garden is large but is only grass. Grass that needs to be mowed (which contributes to emissions) and does not support biodiversity or a resilient environment. I would like the opportunity to build on the back of the section (with my ex-partner keeping the original house) so we both can stay in the community that we love. However, my understanding is that the back of the section does not meet the current requirements and is short 20m<sup>2</sup>. I think that infilling should be considerate to the community, the rules should be more flexible on a case by case basis and also be accessible to normal people who are committed to the community and not just big developers. If I was able to build that would be my home, so I would invest in careful design. I know that even as I am at a disadvantage, I am still better off than others and come from a place of privilege even being able to afford a home in the first place. But security and having a home is a crucial need and there needs to be more diverse housing stock available, which this change will help with.

This plan is a step in the right direction because it recognises the diversity of people in a range of circumstances (not just families) and builds towards a more sustainable land use. People of my generation are concerned about climate change and I have taught students who are also very aware and concerned about the effects of climate. It is frustrating to see land-use development that has gone counter to sustainable design, such as hinterland development on good quality farm land where there are large houses on small sections which increases run-off, increases flood risk, contributes to heat island effects and our reliance of private transport/ cars. This is a positive step to having more affordable housing in the city, where there is access to amenities and diverse communities. I would like to have the opportunity to stay within my community, not be penalized for being single and have a chance to have a home where I can live a more sustainable life. For me this could be a chance for a home and to remain in the community that I love.

## Attached Documents

File
No records to display.

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

## Submitter Details

**Submission Date:** 04/05/2023

**First name:** Victor **Last name:** Ong

**Preferred method of contact** Email

**Postal address:** 565 Yaldhurst Road

**Suburb:** Yaldhurst

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 7676

**Email:** victor@yyx.com.sg

**Daytime Phone:** +65 9679 2545

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 10.1

- Support
- Oppose
- Seek Amendment

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

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

I seek the following decision from the Council

1. to rezone Rural Urban Fringe area in the vicinity of 565 Yaldhurst Rd and its surrounding to Residential Medium Density Zone and

2. extension of the Air Noise Boundary Zone in the vicinity of 565 Yaldhurst Road.

Thank you.

(Address: 565 Yaldhurst Road, Christchurch 7671)

**My submission is that**

Dear Sir/Mdm,

Propose for rezoning and Extension of Air Noise Boundary Zone in the vicinity of 565 Yaldhurst Rd.

I writing to Christchurch City Council to propose the following;

1. Rezoning Rural Urban Fringe area in the vicinity of 565 Yaldhurst Rd and its surrounding to Residential Medium Density Zone

We understand that Christchurch City is currently expanding primarily towards the west, from Yaldhurst Road towards West Coast Road. In light of this, I would like to propose a change in zoning from Rural Urban Fringe to Residential Medium Density/Residential Suburban in the Yaldhurst area. The following reasons support this proposal:

1. By converting more land to residential use, we can help alleviate the density in Christchurch City Centre, leading to a potential reduction in traffic congestion.
2. Releasing land for residential development can contribute to slowing down and stabilizing property prices. Increasing the housing supply can potentially meet the growing demand, reducing the risk of housing price fluctuations and making homeownership more accessible to a broader range of residents.
3. The construction of new housing in this area would enhance the quality of living for residents. New builds often feature improved insulation for better heat and sound insulation, as well as enhanced structural bracing, ensuring increased comfort and safety for occupants.

2. Extension of Air Noise Boundary

We are aware that certain areas around the Christchurch Airport are currently impacted by the Airport Air Noise Boundary, making them unsuitable for residential development according to the current CCC district plan. I would like to propose an extension of the Air Noise Boundary to 60dBA, taking into consideration the following reasons:

1. Both Auckland and Wellington City currently permit the construction of houses within Air Noise Boundaries exceeding 65dBA. This indicates that a slightly lower boundary of 60dBA is reasonable and practical for housing development. Please refer to the attached
2. Studies have shown that areas with an Air Noise Boundary of 65dBA can still be habitable for residential purposes. Therefore, a lower boundary of 60dBA should be acceptable for residential development without significant adverse effects on the well-being of residents.
3. The existing Air Noise Boundary drawn by CCC was established several decades ago, when airplane engines were generally noisier. However, modern aircraft now feature more advanced engines that produce considerably less noise. Updating the Air Noise Boundary would reflect this technological advancement and allow for appropriate residential development.
4. Current housing designs incorporate improved sound insulation, enabling them to better accommodate noise levels. With advancements in construction techniques and materials, houses are now better equipped to mitigate noise disturbances, providing residents with a comfortable living environment even within areas affected by moderate noise levels.

I hope that the CCC will thoroughly consider my proposal, as it has the potential to greatly benefit both the development of the city and the surrounding community. Your thoughtful consideration and approval would be highly appreciated.

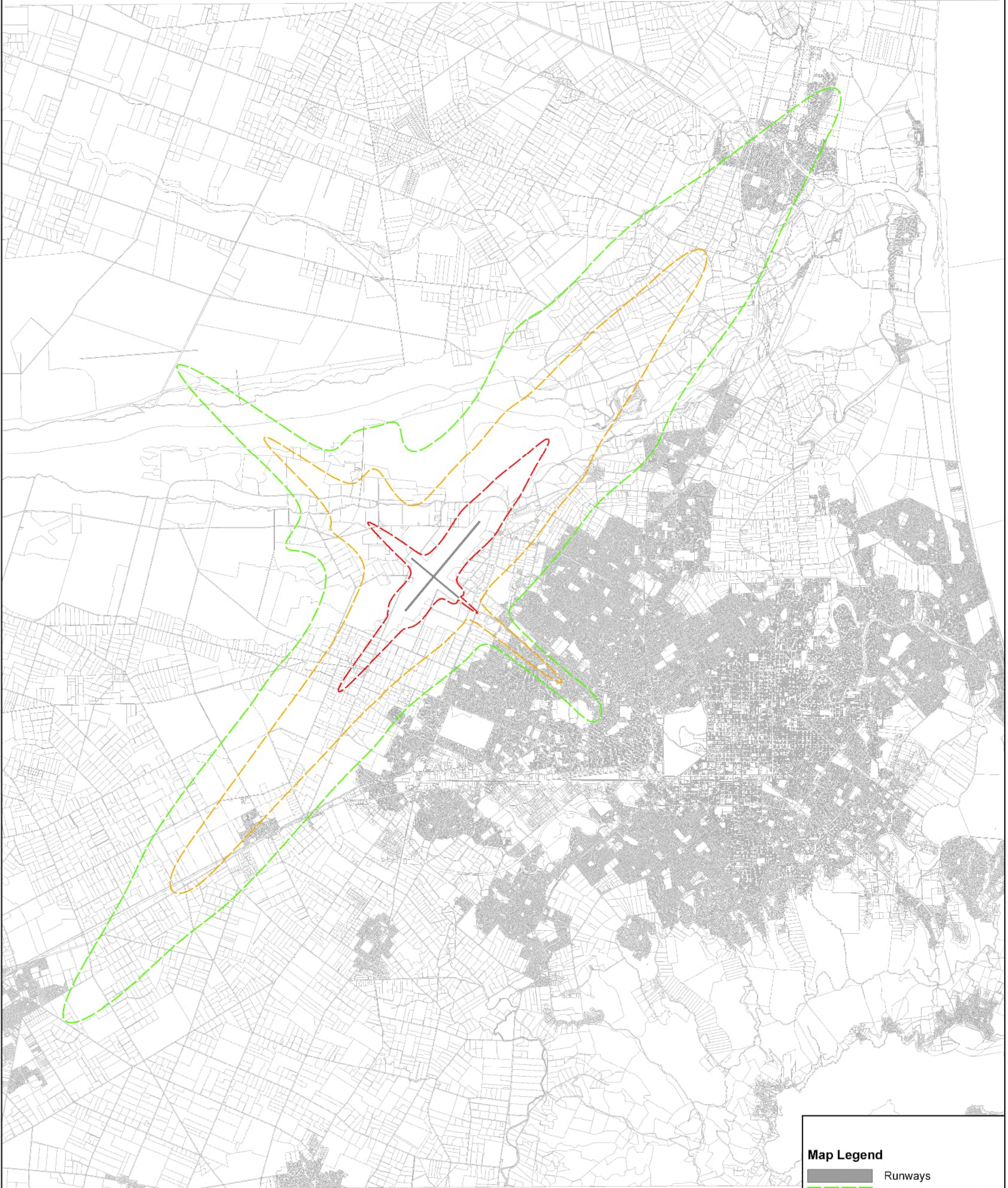
Thank you,  
Best regards,  
Victor Ong Eng Hong

Attached Documents

File
christchurch-airport-noise-contour-map

File
Auckland Airport 2018 Annual Noise Report (dragged)
wellington airport east site appendixacoustic assessment





**Map Legend**

-  Runways
-  District Plan 50 dB Ldn
-  District Plan 55 dB Ldn
-  District Plan 65 dB Ldn
-  Cadastral

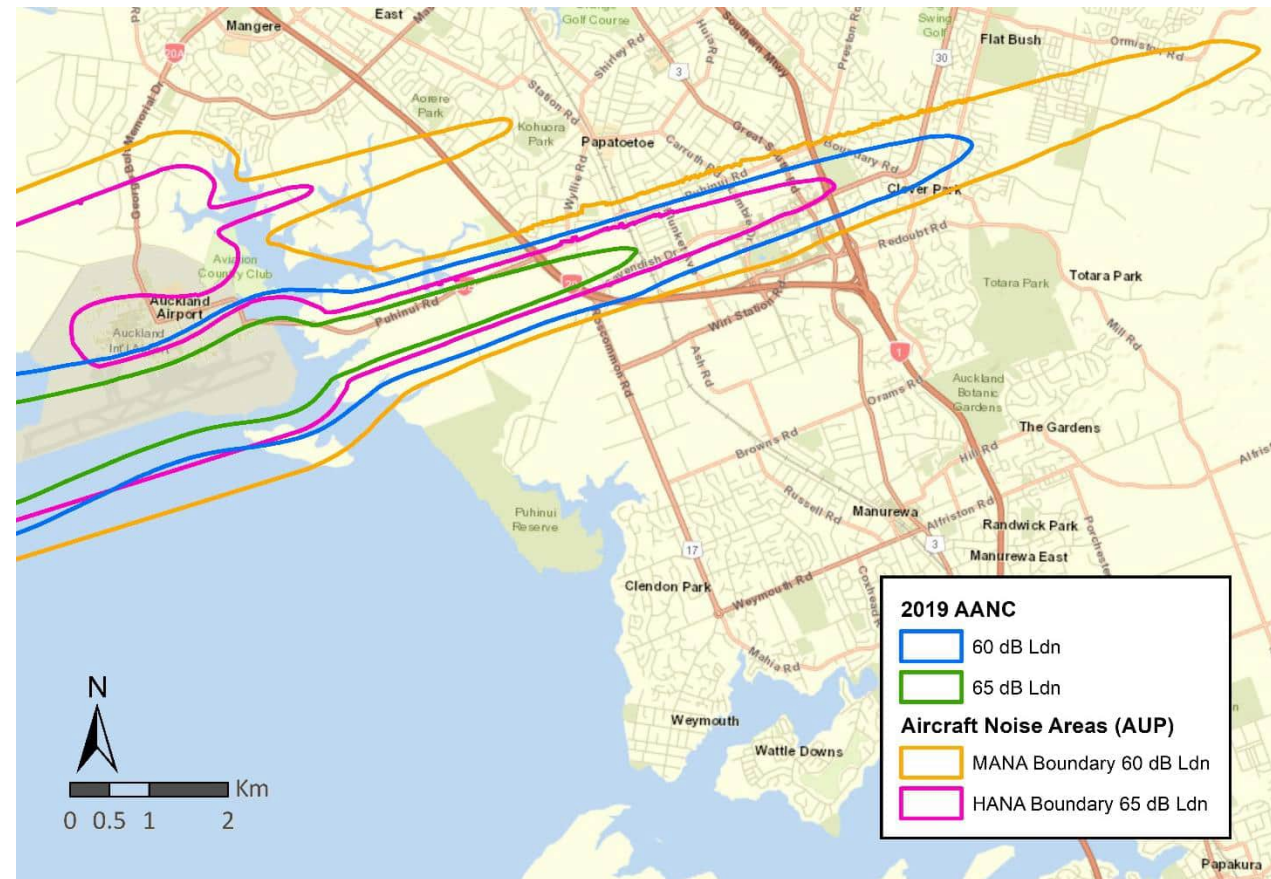
Path: I:\JOBS\2014\2014180A\06 Drawings\Internal\GIS\GIS001 2014180A RNP\GIS001 2014180A RNP.aprx



**6.0 2019 ANNUAL AIRCRAFT NOISE CONTOUR (PROJECTED ACTIVITY) - AANC**

The Annual Aircraft Noise Contours (2019 AANC) will be published in October 2018 and represent noise from aircraft activity predicted to occur in the coming year. The purpose of these noise contours is to identify which properties are eligible to receive an offer for noise mitigation treatment. Figure 7 shows the published 2019 AANC contours compared to the HANA and MANA boundaries proposed to be altered through the Notice of Requirement. Appendix D shows the 2019 AANC contours compared to the operative HANA and MANA boundaries contained in Designation 1100.

**Figure 7: 2019 Annual Aircraft Noise Contour (AANC)**



Appendix E shows the 2018 AANC compared to the 2019 AANC. The 2019 AANC are slightly larger than the 2018 AANC. This is likely due to the growth forecast for FY19.

Table 5 lists the predicted noise levels at the monitoring sites for the 2018 AANC and 2019 AANC. The noise levels in the 2019 AANC are slightly higher than the 2018 AANC.

**Table 5: 2019 AANC Calculated Noise Levels (Projected Activity)**

Monitor Location	2018 AANC L <sub>dn</sub> (dBA)	2019 AANC L <sub>dn</sub> (dBA)	Difference
Puhinui School	61.6	61.8	+0.2
Velodrome	61.8	61.9	+0.1
Prices Road	63.4	63.7	+0.3

As noted above, the 2019 AANC are slightly larger than the 2018 AANC therefore some new offers are required to be made at this year.

**7.0 ENGINE TESTING**

Engine testing noise emissions are limited to 55 dB L<sub>dn</sub> (7 day rolling average) and 75 dB L<sub>max</sub> (10pm – 7am) received in the “Identified Area” shown in Figure 5 of Designation 1100. Noise emissions from engine testing activities are calculated and assessed for compliance monthly at three key locations in the Identified Area (Res1, Res2, Res3). The calculations are based on records of engine testing activity provided by the airport users and established noise levels relating to each type of test.

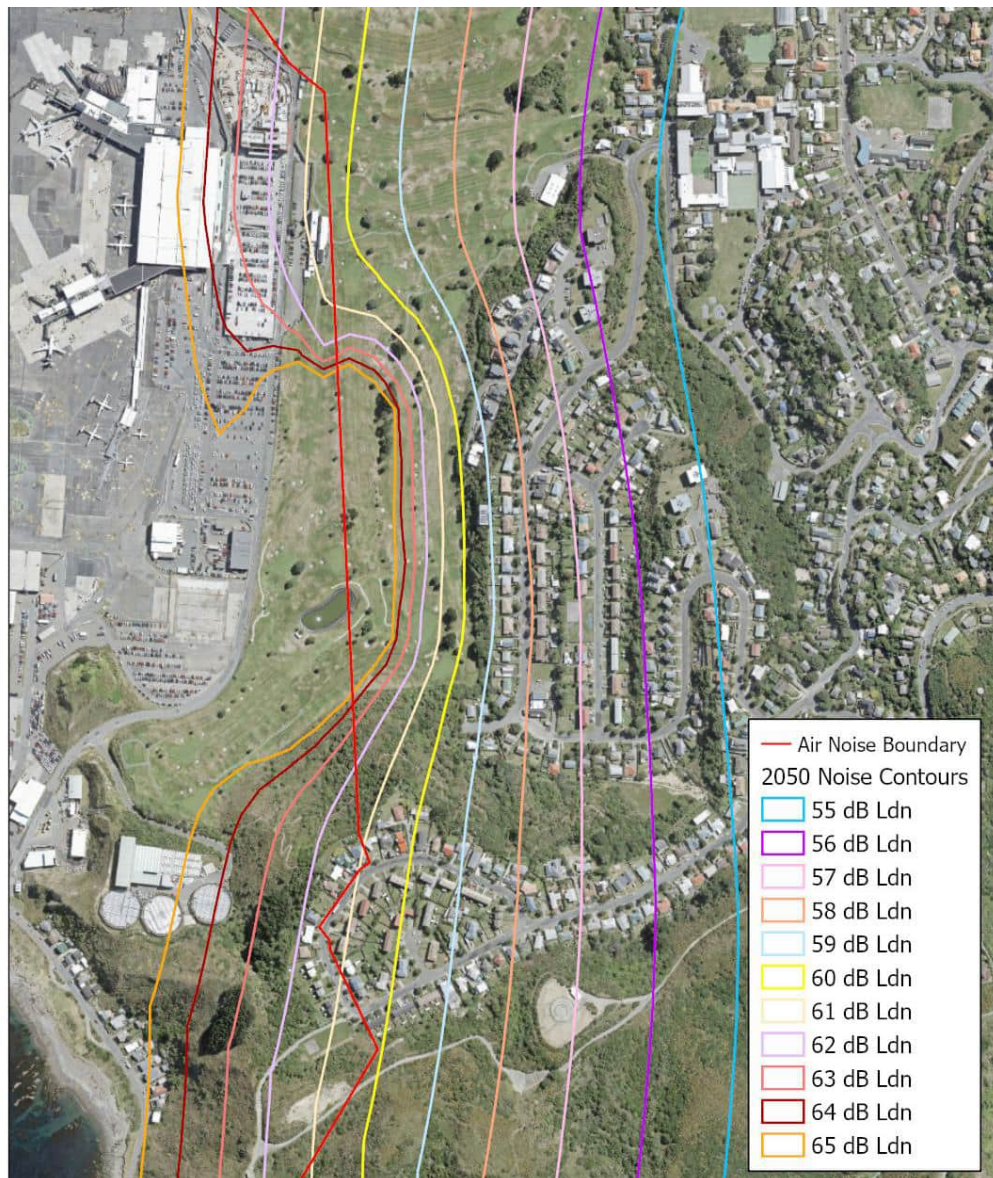
Figure 8 shows the lowest, highest and average 7 day rolling L<sub>dn</sub> noise level at each of the three measurement locations for FY18. The highest L<sub>dn</sub> calculated was between 42 and 44 at the three measurement locations, this is 11-13 decibels below the noise limit.

**Figure 8: FY18 Engine Testing Monitoring Summary**



Figure 9 shows a graph of the 7-day rolling L<sub>dn</sub> noise level at the three measurement locations for each day. Generally, the noise levels were below 40 dB L<sub>dn</sub>.

The purpose of the L<sub>max</sub> limit is to control the maximum noise level during engine testing at night to protect against sleep disturbance. The L<sub>max</sub> level during a test depends on the aircraft type, power setting and propagation conditions but is not affected by the duration of testing. We have previously ascertained that all aircraft undergoing engine testing at Auckland Airport comply with the 75 dB L<sub>max</sub> limit at the three assessment locations for all power settings.

**Figure 8: 2050 Aircraft Operations Noise Contours**


The  $L_{dn}$  noise contours describe the overall noise exposure from aircraft noise events averaged over 3 months in accordance with NZ Standard NZS 6805 and the District Plan. Residents would also notice a change in individual noise events due to aircraft taxiing closer to their homes than they currently do. We have predicted the single event levels from aircraft on the proposed taxiways received at the closest houses on Raukawa Street based on measurements of aircraft taxiing.

The single event levels from a wide body aircraft<sup>12</sup> on the eastern-most taxiway are predicted to be approximately 95 dB  $L_{AE}$  and 83 dB  $L_{Amax}$  at the Raukawa Street houses<sup>13</sup>. For taxiing narrow body aircraft, noise levels would be approximately 84 dB  $L_{AE}$  and 75 dB  $L_{Amax}$ . The 2050 operating scenario includes 12 wide body and 12 narrow body jet aircraft movements per day (7am – 10pm) on the taxiways within the ESA.

<sup>12</sup> Based on Boeing 777-200

<sup>13</sup> Based on measurements at 47 m

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

## Submitter Details

**Submission Date:** 04/05/2023

**First name:** Pauline **Last name:** McEwen

**Preferred method of contact** Email

### Postal address:

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** pmcewen@xtra.co.nz

### Daytime Phone:

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

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

Note to person making submission:

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

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 11.1

- Support
- Oppose
- Seek Amendment

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

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

What do we want the Council to do

1. Change the current Residential Medium Density (RMD) zone at the eastern end of Rugby Street to the new Medium

Density Residential (MRZ) zone, rather than the proposed change to the new High Density Residential (HRZ) zone.

2. Retain an 11m height limit for this new Medium Density Residential (MRZ) zone, as per the limit in the current RMD zone.

### **My submission is that**

We strongly object to the proposed increased height limits on the current Residential Medium Density Zone (RMD) in Merivale - in particular the increased residential development height limit of 14m in the proposed (Local Centre Intensification Precinct areas). While we understand that there is a need for more housing in our community, we believe that this plan will have a negative impact on our community in several ways.

#### Shading

Firstly, the increased height of the buildings will result in significant shading and loss of sun heating for surrounding properties. This will have a detrimental effect on the liveability of the area and negatively impact the quality of life for residents.

To illustrate the impact of the proposed changes we have modelled the shading that would result from the development of three 4 story (14m high) residential buildings on the currently vacant section at 122 Rugby Street, which is 40m east of our two story family home at 112 Rugby Street.

This modelling has shown that the increased height limit from the current 11m limit to the proposed 14m for this development would have the following shading impacts on our property;

- ●Cause significant shading at 8am to occur for 191 consecutive days of the year, from 15 March until 21 September. This is an increase of 48 days or 33% longer compared with the potential shading under the current height limit
- ●Cause significant shading at 9am to occur for 125 consecutive days of the year, an increase of 33 days or 33% longer compared with shading under the current height limit
- ●This significant shading would continue to occur after 9am and through until at least 9:30am for 98 consecutive days of the year, compared with 51 days of shading after 9am under the current height limit

See attached chart illustrating the increased duration of significant shading at different times of the morning throughout the year.

Obviously this significant shading impact would be even worse for properties located any closer to a new 4 story development of this nature.

#### Parking & Wastewater

Secondly, we are concerned that there is not enough consideration being given to the provision of adequate car parking for residents of such high density developments. Merivale is already facing significant parking pressures and increasing the number of residents without adequate parking provision will exacerbate this issue.

Similarly, we are concerned that there has been insufficient in-depth analysis and stress testing of the waste water system capacity in the Merivale area to cope with the level of additional residential development that would be possible under the proposed High Density Residential Zone.

## Character and Aesthetics

Furthermore, four-story buildings are not inline with the character of the Merivale community. This will result in a negative visual impact on the area and detract from the community's overall aesthetic.

In conclusion, we strongly object to the proposed increased height limits on the residential medium density zone in Merivale. We urge the Christchurch City Council to reconsider this plan and take into account the concerns of local residents.

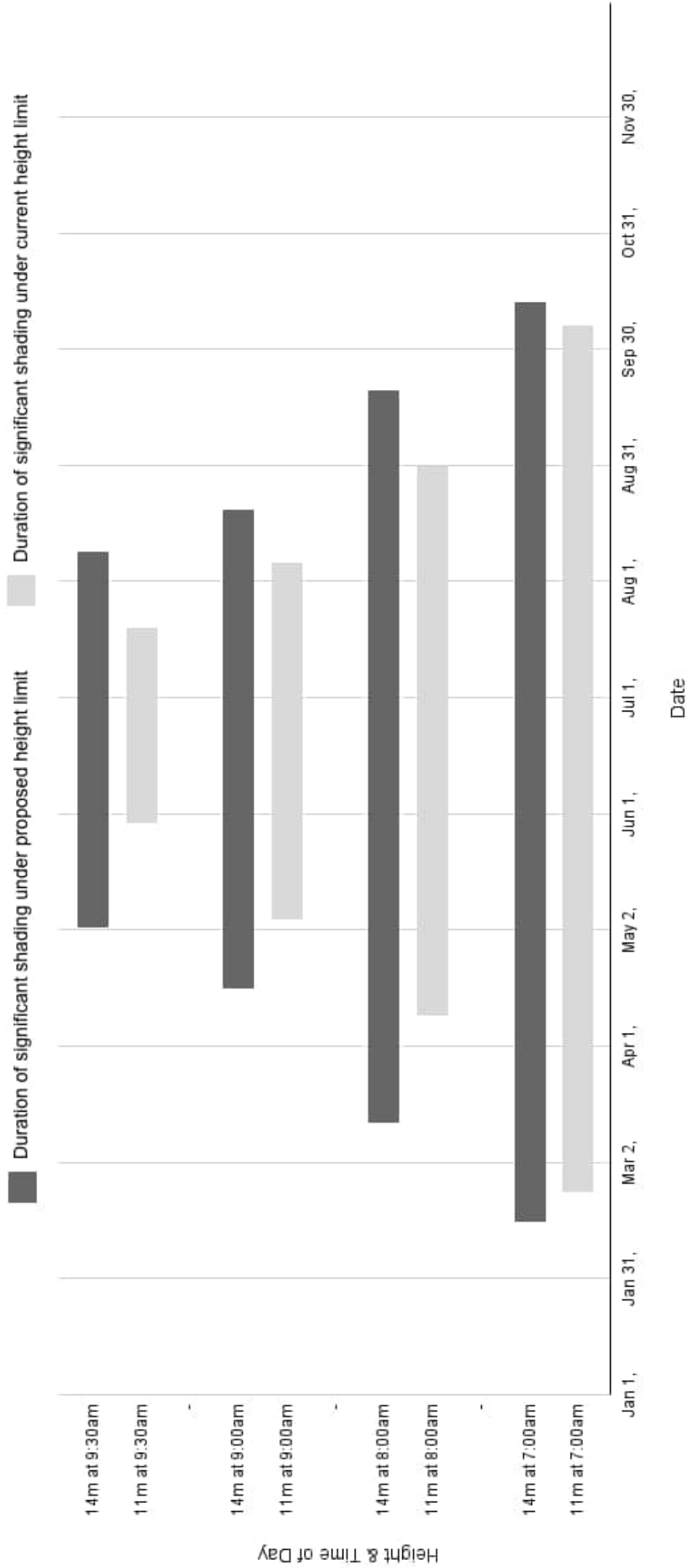
Thank you for your time and consideration.

Sincerely,

---

### Attached Documents

File
CCC District Plan PC14 submission - 112 Rugby (1)
Shading chart 112 Rugby Street



## 112 Rugby Street

We strongly object to the proposed increased height limits on the current Residential Medium Density Zone (RMD) in Merivale - in particular the increased residential development height limit of 14m in the proposed (Local Centre Intensification Precinct areas). While we understand that there is a need for more housing in our community, we believe that this plan will have a negative impact on our community in several ways.

### Shading

Firstly, the increased height of the buildings will result in significant shading and loss of sun heating for surrounding properties. This will have a detrimental effect on the liveability of the area and negatively impact the quality of life for residents.

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Secondly, we are concerned that there is not enough consideration being given to the provision of adequate car parking for residents of such high density developments. Merivale is already facing significant parking pressures and increasing the number of residents without adequate parking provision will exacerbate this issue.



Similarly, we are concerned that there has been insufficient in-depth analysis and stress testing of the waste water system capacity in the Merivale area to cope with the level of additional residential development that would be possible under the proposed High Density Residential Zone.

### **Character and Aesthetics**

Furthermore, four-story buildings are not inline with the character of the Merivale community. This will result in a negative visual impact on the area and detract from the community's overall aesthetic.

In conclusion, we strongly object to the proposed increased height limits on the residential medium density zone in Merivale. We urge the Christchurch City Council to reconsider this plan and take into account the concerns of local residents.

Thank you for your time and consideration.  
Sincerely,

---

### **What do we want the Council to do**

1. Change the current Residential Medium Density (RMD) zone at the eastern end of Rugby Street to the new Medium Density Residential (MRZ) zone, rather than the proposed change to the new High Density Residential (HRZ) zone.
  2. Retain an 11m height limit for this new Medium Density Residential (MRZ) zone, as per the limit in the current RMD zone.
-

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

## Submitter Details

**Submission Date:** 04/05/2023

**First name:** Jarrod **Last name:** Dixon

**Preferred method of contact** Email

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** jarrod.dixon@4sight.co.nz

**Daytime Phone:** 021 948 073

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 12.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

My submission is that

Please see the detailed submission attached.

---

Attached Documents

File
Jarrold Dixon-Fuel Companies Submission_PC14 of the Christchurch District Plan

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

## Submitter Details

**Submission Date:** 04/05/2023

**First name:** Jarrod **Last name:** Dixon

**Preferred method of contact** Email

**Postal address:**

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**Country:** New Zealand

**Postcode:**

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

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

Additional requirements for hearing:

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 12.2

- 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**

Please see submission attached.

---

Attached Documents

File
Jarrold Dixon-Fuel Companies Submission_PC14 of the Christchurch District Plan

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

## Submitter Details

**Submission Date:** 04/05/2023

**First name:** Jarrod **Last name:** Dixon

**Preferred method of contact** Email

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** jarrod.dixon@4sight.co.nz

**Daytime Phone:** 021 948 073

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

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

Additional requirements for hearing:

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 12.3

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

**My submission is that**

Submit on behalf of BP Oil Limited, Z Energy Limited, and Mobil Oil Limited. Please see the attachment.

---

Attached Documents

File
Jarrold Dixon-Fuel Companies Submission_PC14 of the Christchurch District Plan
Jarrold Dixon-email

**SUBMISSION ON PROPOSED PLAN CHANGE 14 TO THE CHRISTCHURCH DISTRICT PLAN  
PURSUANT TO CLAUSE 6 OF THE FIRST SCHEDULE OF THE RESOURCE MANAGEMENT ACT  
1991**

**To:** Christchurch City Council  
PO Box 73012  
Christchurch 8154

Via email: [engagement@ccc.govt.nz](mailto:engagement@ccc.govt.nz)

**Submitter:** bp Oil New Zealand Limited  
PO Box 99 873  
Auckland 1149

Mobil Oil New Zealand Limited  
PO Box 1709  
Auckland 1140

Z Energy Limited  
PO Box 2091  
Wellington 6140

*Hereafter referred to as The Fuel Companies*

**Address for Service:** 4Sight Consulting Limited  
201 Victoria Street West  
Auckland Central  
Auckland 1010

Attention: Jarrod Dixon  
Phone: 021 948 073  
Email: [jarrod.dixon@4sight.co.nz](mailto:jarrod.dixon@4sight.co.nz)



## A. INTRODUCTION

Christchurch City Council (*Council*) is a Tier 1 authority and required to implement the intensification policies of the National Policy Statement for Urban Development (*NPS:UD*) and Medium Density Residential Standards (*MDRS*) to enable greater housing choice throughout Christchurch's urban environments (*the district*). Council has notified Proposed Plan Change 14 to its district plan (*PC14*) in response to these requirements.

bp Oil New Zealand Limited, Mobil Oil New Zealand Limited, and Z Energy Limited (*the Fuel Companies*) receive, store, and distribute refined petroleum products around New Zealand. In Christchurch, the Fuel Companies' business includes retail fuel outlets, namely service stations and truck stops, and supply to commercial facilities. The Fuel Companies also have aviation facilities and bulk fuel storage facilities (*terminals*) and associated pipelines. The terminals are recognised in the Christchurch District Plan (*District Plan*) as critical and strategic infrastructure.

These existing activities include the storage and use of hazardous substances (typically petrol, diesel, and LPG), the refuelling of vehicles, and often other vehicle services (air pump, car wash, etc.), and retail activities. Fuel deliveries are undertaken via tankers which occur infrequently but often without restriction in terms of frequency or times. All sites have established vehicle crossings for access and exit, buildings, and signage (often illuminated). Pump stations are located beneath a forecourt canopy which is usually lit via under canopy lighting. Hours of operation vary and are not infrequently 24/7. These sites are required to comply with permitted noise limits of the district plan or limits otherwise included as conditions in an approved land use consent. The Fuel Companies' sites operate in accordance with Emergency Management Plans detailing procedures in case of emergency, including spills of hazardous substances.

These retail fuel activities are located in a variety of zones, including at the edge of zones, and it is not unusual for these sites to immediately adjoin boundaries with residential zones (often where those residential activities are of lower density than anticipated by the NPS:UD and MDRS) or residential activities. While retail fuel activities can and do occur appropriately in a range of environments/zones, the perceived acceptability of potential adverse effects can be influenced by the intensity and nature of adjoining activities. This submission relates primarily to the interface of proposed higher density residential activities with existing lawfully established non-residential activities.

## B. THE SPECIFIC PROVISIONS OF PROPOSED PLAN CHANGE 14 TO THE OPERATIVE PLAN THAT THE FUEL COMPANIES' SUBMISSION RELATES TO ARE SUMMARISED AS FOLLOWS

The specific provisions submitted on, the rationale for The Fuel Companies' submission on each of these matters, and the relief sought is contained in the schedule below. Specific changes sought to the provisions (as proposed) are highlighted yellow with deletions in ~~double strikethrough~~ and additions in double underline. The Fuel Companies support alternative relief that achieves the same outcome(s).

In addition to the specific outcomes and relief sought, the following general relief is sought:

- a) Achieve the following:
  - i. The purpose and principles of the Resource Management Act 1991 (*RMA*) and consistency with the relevant provisions in Sections 6 - 8 RMA;
  - ii. Give effect to the Canterbury Regional Policy Statement;
  - iii. Assist the Council to carry out its functions under Section 31 RMA;
  - iv. Meet the requirements of the statutory tests in Section 32 RMA; and
  - v. Avoid, remedy or mitigate any relevant and identified environmental effects;

- b) Make any alternative or consequential relief as required to give effect to this submission, including any consequential relief required in any other sections of the proposed plan that are not specifically subject of this submission but where consequential changes are required to ensure a consistent approach is taken throughout the document; and
- c) Any other relief required to give effect to the issues raised in this submission.

- C. THE FUEL COMPANIES WISH TO BE HEARD IN SUPPORT OF THIS SUBMISSION.**
- D. IF OTHERS MAKE SIMILAR SUBMISSIONS THE FUEL COMPANIES MAY BE PREPARED TO CONSIDER PRESENTING A JOINT CASE WITH THEM AT ANY HEARING.**
- E. THE FUEL COMPANIES COULD NOT GAIN AN ADVANTAGE IN TRADE COMPETITION THROUGH THIS SUBMISSION.**
- F. THE FUEL COMPANIES ARE DIRECTLY AFFECTED BY AN EFFECT OF THE SUBJECT MATTER OF THE SUBMISSION THAT –**
  - I. ADVERSELY AFFECTS THE ENVIRONMENT; AND**
  - II. DOES NOT RELATE TO TRADE COMPETITION OR THE EFFECTS OF TRADE COMPETITION.**

Signed on behalf of Z Energy Limited, bp Oil New Zealand Limited and Mobil Oil New Zealand Limited



Jarrod Dixon  
Senior Planner

Date this 3<sup>rd</sup> May 2023

## SCHEDULE A – INTENSIFICATION

- 1.1 The Fuel Companies appreciate intensification changes are required under either the NPS:UD or the MDRS with little to no discretion on their applicability, other than for qualifying matters, and are neutral to them subject to ensuring reverse sensitivity effects on lawfully established retail fuel activities are appropriately managed.
- 1.2 PC14 will alter development potential around these facilities with corresponding potential to give rise to reverse sensitivity effects including nuisance effects (e.g. noise and lighting) and amenity effects. For instance, an occupier of a terraced apartment or residential occupier of a multi storey mixed use development is more likely to perceive noise and visual effects compared to an occupier of single-storey dwelling and, more than likely, setback from the boundary and screened by a fence and landscaping, or commercial activity. The Fuel Companies consider this is a potential adverse effect on the ongoing operation, maintenance, and upgrade of these facilities, which are a physical resource that must be managed under the Act. The Fuel Companies anticipate that this will be a wider issue for non-residential activities more generally, which, like fuel industry sites, have demonstrated that they can operate in a range of zones and at zone interfaces.
- 1.3 The Fuel Companies acknowledge that relief is not appropriate in relation to the construction and use of up to three residential dwellings per site in accordance with permitted activity standards in residential zones. However, where consent is required in residential zones, and where residential development is a component of development in Commercial Zones, the Fuel Companies consider that residential amenity and existing activities need to be appropriately protected by provisions which respond to any interfaces with Commercial Zones, or with lawfully established non-residential activities. This is reflected in the *National Medium Density Design Guide (Ministry for the Environment, May 2022)*<sup>1</sup> which encourages new development to respond to existing or proposed nearby non-residential activities.
- 1.4 To this effect, the Fuel Companies seek that PC14 be amended to ensure that reverse sensitivity effects on existing lawfully established non-residential activities are minimised. This could be achieved by amending the following provisions as set out in the following table (deletions in double strikethrough, additions in double underline). Alternative relief may achieve the same outcome.

---

<sup>1</sup> <https://environment.govt.nz/publications/national-medium-density-design-guide/>, accessed on 13 September 2022

Table 1: Fuel Companies submission

Sub Point	Plan Provision	Position	Reason	Relief Sought
<b>Chapter 5 – Natural Hazards</b>				
1	5.2.2.5.1 Policy – Managing development in Qualifying Matter Coastal Hazard Management Areas	Support but clarity sought	<p>The intent of this policy is supported but clarity is sought on the phrase ‘intensification of any site’ in Clause (a). The Fuel Companies assume this policy relates to development, subdivision and land use that provides for higher density residential activities (as reflected by the intent of PC14) rather than, for example, development (e.g. new buildings) that support existing non-residential activities.</p> <p>The Fuel Companies assume that Clauses (a) and (b) are both standalone policies with Clause (a) providing direction on managing risk associated with higher residential densities or ‘intensification’ with Clause (b) providing direction on buildings associated with all activities (i.e. not just residential activities). This interpretation would appear consistent with the corresponding rule framework (5.4A) which applies to all new buildings, earthworks and stormwater instead of just those relating to residential activities or residential intensification. Clarity is sought in this regard.</p>	<p><b>Retain</b> as notified</p> <p><u>AND</u></p> <p><b>Clarify</b> that the phrase ‘intensification of any site’ in Clause (a) only relates to higher density residential activities (i.e. not new developments associated with non-residential activities) and that Clause (b) applies to all buildings rather than just those associated with residential activities or residential intensification.</p>
2	5.2.2.5.2 Policy – Managing development within Qualifying Matter Tsunami Management Area	Support	As above, the Fuel Companies assume ‘intensification’ relates to an increase in residential activities in the QM area rather than non-residential development. Notwithstanding, the Fuel Companies support that development, subdivision and land use can be undertaken on the basis that the risk to life is acceptable.	<b>Retain</b> as notified
3	5.4A Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Tsunami Management Area	Support	The Fuel Companies support these rules and seek they are retained as notified.	<b>Retain</b> as notified
<b>Chapter 6 – General Rules</b>				
<b>Sub-chapter 6.5 Scheduled Activities</b>				
4	Entire Chapter	Support	<p>The Fuel Companies operate service stations in operative residential zones and which are listed as Scheduled Activities in Rule 6.5.6.</p> <p>PC14 proposes changes to Chapter 6.5 to reflect that these service stations will be located in one of the proposed residential zones (e.g. Medium Density Residential Zone) but proposes no substantive changes to any rules, standards or matters of discretion. The Fuel Companies support this approach.</p>	<b>Retain</b> as notified
<b>Chapter 8 – Subdivision, Development and Earthworks</b>				
5	8.9A Rules – Development and Activities in Wastewater Constraint Areas	Support in part	<p>The Fuel Companies support the intent of these rules which seek to manage new or expanded activities in Waste Water Constraint Areas.</p> <p>The Fuel Companies assume the ‘expansion of activities beyond those that existing prior to 17 March 2023’ relates to amended activities that would generate greater volumes of wastewater as opposed to maintenance, upgrades or new buildings (e.g. Electric</p>	<p><b>Retain</b> as notified</p> <p><u>AND</u></p> <p><b>Clarify</b> that the rule only applies when the volume of wastewater discharged is or could be increased and is therefore not applicable to smaller scale activities that do not affect wastewater discharge volumes</p>

Sub Point	Plan Provision	Position	Reason	Relief Sought
			Vehicle charging stations, replacement of underground infrastructure such as a stormwater treatment device, stormwater tanks or a new or replacement petrol or diesel storage tank, that would not increase the wastewater discharge from the site). Clarity is sought in this regard.	
<b>Chapter 14 – Residential</b>				
<b>14.2. Objectives and Policies</b>				
9	14.2.3.7 Policy – Management of increased building heights	Support in part	Occupiers in taller residential buildings are more likely to perceive adverse noise and nuisance effects compared to existing standalone dwellings (as generally enabled under the operative plan) and therefore have the potential to generate reverse sensitivity effects on existing lawfully established non-residential activities. The Fuel Companies consider that direction should be provided in this policy to incorporate consideration of design features that reduce potential reverse sensitivity effects that will result in better amenity outcomes for future residents and protect the ongoing operation of existing non-residential activities.	<p><b>Amend</b> Policy 14.2.3.7 as follows:</p> <p>a. <u>Within medium and high density zoned areas, only provide for increased building heights beyond those enabled in the zone or precinct where the following is achieved:</u></p> <ul style="list-style-type: none"> <li>i. <u>the development provides for a greater variety of housing types, price points, and sizes, when compared to what is provided in the surrounding area;</u></li> <li>ii. <u>the development is consistent with the built form outcomes anticipated by the underlying zone or precinct;</u></li> <li>iii. <u>the site is located within walking distance of public or active transport corridors; community facilities or commercial activities; and public open space;</u></li> <li>iv. <u>building design features are used to reduce:</u> <ul style="list-style-type: none"> <li>A. <u>significant shading, dominance and privacy effects caused by increased height on adjacent residential properties and public spaces; and</u></li> <li>B. <u>the effects of dominance and shading on historic heritage, significant trees, or character areas;</u></li> <li>C. <u>reverse sensitivity effects on existing non-residential activities.</u></li> </ul> </li> <li>v. <u>When considering height increases within 1.2km from the city centre, the economic impacts on the city centre from an increase in height.</u></li> </ul>
11	14.2.5.1 Policy – Neighbourhood character, amenity and safety	Support in part	The Fuel Companies support this amended policy, specifically the direction in clause (iv) which seeks to provide for developments which contribute to a high quality environment through a site layout and building design that minimises noise effects from traffic, railway activity and other sources to protect residential amenity which, in turn, reduces the potential for reverse sensitivity effects.	<b>Retain</b> as notified
13	14.2.5.3 Policy – Quality large scale developments	Support in part	For the reasons previously stated and as set out in Paragraphs 1-4 above, the Fuel Companies consider that policy direction is needed for new larger residential developments (i.e. four or more dwellings) to minimise reverse sensitivity effects on existing lawfully established activities.	<p><b>Amend</b> 14.2.5.3 Policy as follows:</p> <p>a. <u>Residential developments of four or more residential units contribute to a high quality residential environment through site layout, building and landscape design to achieve:</u></p> <ul style="list-style-type: none"> <li>i. <u>engagement with the street and other spaces;</u></li> <li>ii. <u>minimisation of the visual bulk of buildings and provision of visual interest;</u></li> <li>iii. <u>high level of internal and external residential amenity;</u></li> <li>iv. <u>high quality shared spaces, including communal living spaces and accessways that provide safe, direct access for pedestrians;</u></li> <li>v. <u>a safe and secure environment; and</u></li> <li>vi. <u>public through connections for large sites with multiple public frontages.</u></li> <li>vii. <u>Minimisation of reverse sensitivity effects on existing lawfully established non-residential activities.</u></li> </ul>
14	14.2.12 Objective – Compatibility with	Support in part	The Fuel Companies support the intent of this objective which seeks to ensure new residential development is compatible with industrial activities. It is considered however that the terms ‘adversely affected’ and ‘does not affect’ are not appropriate	<b>Replace</b> 14.2.12 Objective as follows:

Sub Point	Plan Provision	Position	Reason	Relief Sought
	Industrial Activities (New)		<p>and are more relevant to determining adverse effects for the purposes of Section 95 of the Act.</p> <p>The proposed objective, as notified, also does not acknowledge that residential developments can be susceptible to other effects (e.g. visual, odour, lighting) in addition to noise effects and would not apply to lawfully established industrial activities in non-industrial zones and where potential effects on residential developments and reverse sensitivity effects are also likely to occur.</p> <p>The Fuel Companies consider the relief sought is more comprehensive and better reflects the intention of the objective in ensuring new residential development is compatible with industrial activities.</p>	<p>a. <u>New residential development is not adversely affected by noise generated from industrial activities and the development does not affect the operation of industrial activities within industrial zones.</u></p> <p><u>New residential development is compatible with existing lawfully established industrial activities.</u></p>
15	14.2.12.1 Policy – Managing effects on industrial activities (New)	Support in part	The Fuel Companies support this new policy which provides direction to minimise reverse sensitivity effects on existing and future industrial activities and protect the health and safety of residents. For the reasons set out above, amendments are sought to acknowledge that existing industrial activities not located in industrial zones should similarly be protected from the effects of reverse sensitivity, replace the term ‘adversely affect’ and ensure the amenity of residents is also protected.	<p><b>Amend</b> 14.2.1.2.1 Policy as follows:</p> <p>a. <u>Restrict new residential development of three or more storeys within proximity to existing lawfully established industrial activities and industrial zoned sites where it would give rise to reverse sensitivity effects on industrial activities and/or compromise adversely affect the amenity, health and safety of residents, unless mitigation sufficiently addresses the effects.</u></p>
<b>14.15 Rules – Matters of control and discretion</b>				
<b>14.15.1 Residential Design Principles</b>				
16	Clause (c) – Site layout and context	Support in part	The Fuel Companies support the proposed changes to Clause (c) but consider, for reasons previously stated, that direction is required as to how the development of four more dwellings incorporates design techniques to minimise reverse sensitivity effects on existing non-residential activities.	<p><b>Amend</b> Clause (c) as follows:</p> <p>c. <del>City context and character</del> <u>Site layout and context:</u></p> <p>i. <del>Whether the design of the development is in keeping with, or complements, the scale and character of development anticipated for the surrounding area and relevant significant natural, heritage and cultural features</del> <u>Whether the development achieves high quality design through a logical and coherent site layout that prioritises the street interface, a public frontage for each unit, and safe and direct pedestrian access throughout the development.</u></p> <p>ii. The relevant considerations <del>are</del> <u>include</u> the extent to which the development:</p> <p>....</p> <p><b>G.</b> <u>Incorporates design techniques to minimise reverse sensitivity effects on existing lawfully established non-residential activities.</u></p>
17	Clause (e) – Built form and appearance	Support in part	As above	<p><b>Amend</b> Clause (e) as follows:</p> <p>e. Built form and appearance</p> <p>i. Whether the development is designed to <del>manage</del> <u>minimise</u> the visual bulk of the buildings and provide visual interest.</p> <p>ii. The relevant considerations <del>are</del> <u>include</u> the extent to which the development:</p> <p>...</p> <p><b>F.</b> <u>Incorporates design techniques to minimise reverse sensitivity effects on existing lawfully established non-residential activities.</u></p>
18	Clause (f) – Residential environment	Support in part	As above	<p><b>Amend</b> Clause (f) as follows:</p> <p>e. Residential <del>amenity</del> <u>environment</u></p> <p>i. <del>In relation to the built form and residential amenity of the development on the site (i.e. the overall site prior to the development), whether how the development provides a high level of good internal and external residential amenity for occupants and neighbours is provided.</del></p> <p>ii. The relevant considerations <del>are</del> <u>include</u> the extent to which the development:</p>

Sub Point	Plan Provision	Position	Reason	Relief Sought
				... F. <u>Incorporates design techniques to minimise reverse sensitivity effects on existing lawfully established non-residential activities.</u>
<b>14.15.2 Site Density and Site Coverage</b>				
19	Clause (a)	Support in part	The Fuel Companies consider that where there is an infringement to the relevant Site Density and Site Coverage standards in residential zones, consideration of reverse sensitivity effects is required.	<b>Amend</b> Clause (a) as follows: a. Whether the non-compliance is appropriate to its context taking into account: ... vii. <u>reverse sensitivity effects on existing lawfully established non-residential activities.</u>
<b>14.15.3 Impacts on neighbouring property</b>				
20	Clause (a)	Support in part	The Fuel Companies consider that where taller buildings are proposed and where there are infringements to building setbacks, consideration of reverse sensitivity effects is required.	<b>Amend</b> Clause (a) as follows: a. Whether the increased height, <u>or</u> reduced setbacks, <u>or</u> <del>recession plane intrusion</del> would result in buildings that do not compromise the <u>amenity of adjacent properties</u> planned urban built character. <del>taking into account</del> The following matters of discretion apply: ... viii. <u>reverse sensitivity effects on existing lawfully established non-residential activities.</u>
21	Clause (c)	Support in part	As above	<b>Amend</b> Clause (c) as follows: c. <u>Within the Medium Density Residential zone, for buildings exceeding 14 metres in height, and within the High Density Residential zone, for buildings exceeding 32 metres in height, the matters of discretion are as follows:</u> ... xv. <u>reverse sensitivity effects on existing lawfully established non-residential activities.</u>
<b>14.15.4 Height in relation to boundary breaches</b>				
22	Clause (a)	Support in part	The Fuel Companies consider that where there is an infringement to the height and relation to boundary standards from residential developments, consideration of reverse sensitivity effects is required.	<b>Amend</b> Clause (a) as follows: a. <u>Whether the non-compliance is appropriate to its planned urban built character, taking into account:</u> ... v. <u>reverse sensitivity effects on existing lawfully established non-residential activities.</u>
<b>Chapter 15 – Commercial</b>				
23	15.2.4. Objective – Urban form, scale and design outcomes	Support	The Fuel Companies support the proposed amendments to this objective, particularly Clause (iv) which includes specific direction to manage reverse sensitivity effects on the site and surrounding environment.	<b>Retain</b> as notified
24	15.2.4.2 Policy – Design of new development	Support	The Fuel Companies support the proposed amendments to this objective, noting that the direction to minimise reverse sensitivity effects is not proposed to be changed.	<b>Retain</b> as notified
25	15.14.2.3 Residential Activity Matter of Discretion	Support	The Fuel Companies support the proposed amendments to this objective; in particular, noting that the specific direction to manage reverse sensitivity effects in Lyttelton is not proposed to be changed.	<b>Retain</b> as notified

**SUBMISSION ON PROPOSED PLAN CHANGE 14 TO THE CHRISTCHURCH DISTRICT PLAN  
PURSUANT TO CLAUSE 6 OF THE FIRST SCHEDULE OF THE RESOURCE MANAGEMENT ACT  
1991**

**To:** Christchurch City Council  
PO Box 73012  
Christchurch 8154

Via email: [engagement@ccc.govt.nz](mailto:engagement@ccc.govt.nz)

**Submitter:** bp Oil New Zealand Limited  
PO Box 99 873  
Auckland 1149

Mobil Oil New Zealand Limited  
PO Box 1709  
Auckland 1140

Z Energy Limited  
PO Box 2091  
Wellington 6140

*Hereafter referred to as The Fuel Companies*

**Address for Service:** 4Sight Consulting Limited  
201 Victoria Street West  
Auckland Central  
Auckland 1010

Attention: Jarrod Dixon  
Phone: 021 948 073  
Email: [jarrod.dixon@4sight.co.nz](mailto:jarrod.dixon@4sight.co.nz)



## A. INTRODUCTION

Christchurch City Council (*Council*) is a Tier 1 authority and required to implement the intensification policies of the National Policy Statement for Urban Development (*NPS:UD*) and Medium Density Residential Standards (*MDRS*) to enable greater housing choice throughout Christchurch's urban environments (*the district*). Council has notified Proposed Plan Change 14 to its district plan (*PC14*) in response to these requirements.

bp Oil New Zealand Limited, Mobil Oil New Zealand Limited, and Z Energy Limited (*the Fuel Companies*) receive, store, and distribute refined petroleum products around New Zealand. In Christchurch, the Fuel Companies' business includes retail fuel outlets, namely service stations and truck stops, and supply to commercial facilities. The Fuel Companies also have aviation facilities and bulk fuel storage facilities (*terminals*) and associated pipelines. The terminals are recognised in the Christchurch District Plan (*District Plan*) as critical and strategic infrastructure.

These existing activities include the storage and use of hazardous substances (typically petrol, diesel, and LPG), the refuelling of vehicles, and often other vehicle services (air pump, car wash, etc.), and retail activities. Fuel deliveries are undertaken via tankers which occur infrequently but often without restriction in terms of frequency or times. All sites have established vehicle crossings for access and exit, buildings, and signage (often illuminated). Pump stations are located beneath a forecourt canopy which is usually lit via under canopy lighting. Hours of operation vary and are not infrequently 24/7. These sites are required to comply with permitted noise limits of the district plan or limits otherwise included as conditions in an approved land use consent. The Fuel Companies' sites operate in accordance with Emergency Management Plans detailing procedures in case of emergency, including spills of hazardous substances.

These retail fuel activities are located in a variety of zones, including at the edge of zones, and it is not unusual for these sites to immediately adjoin boundaries with residential zones (often where those residential activities are of lower density than anticipated by the NPS:UD and MDRS) or residential activities. While retail fuel activities can and do occur appropriately in a range of environments/zones, the perceived acceptability of potential adverse effects can be influenced by the intensity and nature of adjoining activities. This submission relates primarily to the interface of proposed higher density residential activities with existing lawfully established non-residential activities.

## B. THE SPECIFIC PROVISIONS OF PROPOSED PLAN CHANGE 14 TO THE OPERATIVE PLAN THAT THE FUEL COMPANIES' SUBMISSION RELATES TO ARE SUMMARISED AS FOLLOWS

The specific provisions submitted on, the rationale for The Fuel Companies' submission on each of these matters, and the relief sought is contained in the schedule below. Specific changes sought to the provisions (as proposed) are highlighted **yellow** with deletions in ~~double strikethrough~~ and additions in double underline. The Fuel Companies support alternative relief that achieves the same outcome(s).

In addition to the specific outcomes and relief sought, the following general relief is sought:

- a) Achieve the following:
  - i. The purpose and principles of the Resource Management Act 1991 (*RMA*) and consistency with the relevant provisions in Sections 6 - 8 RMA;
  - ii. Give effect to the Canterbury Regional Policy Statement;
  - iii. Assist the Council to carry out its functions under Section 31 RMA;
  - iv. Meet the requirements of the statutory tests in Section 32 RMA; and
  - v. Avoid, remedy or mitigate any relevant and identified environmental effects;

- b) Make any alternative or consequential relief as required to give effect to this submission, including any consequential relief required in any other sections of the proposed plan that are not specifically subject of this submission but where consequential changes are required to ensure a consistent approach is taken throughout the document; and
- c) Any other relief required to give effect to the issues raised in this submission.

- C. THE FUEL COMPANIES WISH TO BE HEARD IN SUPPORT OF THIS SUBMISSION.**
- D. IF OTHERS MAKE SIMILAR SUBMISSIONS THE FUEL COMPANIES MAY BE PREPARED TO CONSIDER PRESENTING A JOINT CASE WITH THEM AT ANY HEARING.**
- E. THE FUEL COMPANIES COULD NOT GAIN AN ADVANTAGE IN TRADE COMPETITION THROUGH THIS SUBMISSION.**
- F. THE FUEL COMPANIES ARE DIRECTLY AFFECTED BY AN EFFECT OF THE SUBJECT MATTER OF THE SUBMISSION THAT –**
  - I. ADVERSELY AFFECTS THE ENVIRONMENT; AND**
  - II. DOES NOT RELATE TO TRADE COMPETITION OR THE EFFECTS OF TRADE COMPETITION.**

Signed on behalf of Z Energy Limited, bp Oil New Zealand Limited and Mobil Oil New Zealand Limited



Jarrod Dixon  
Senior Planner

Date this 3<sup>rd</sup> May 2023

## SCHEDULE A – INTENSIFICATION

- 1.1 The Fuel Companies appreciate intensification changes are required under either the NPS:UD or the MDRS with little to no discretion on their applicability, other than for qualifying matters, and are neutral to them subject to ensuring reverse sensitivity effects on lawfully established retail fuel activities are appropriately managed.
- 1.2 PC14 will alter development potential around these facilities with corresponding potential to give rise to reverse sensitivity effects including nuisance effects (e.g. noise and lighting) and amenity effects. For instance, an occupier of a terraced apartment or residential occupier of a multi storey mixed use development is more likely to perceive noise and visual effects compared to an occupier of single-storey dwelling and, more than likely, setback from the boundary and screened by a fence and landscaping, or commercial activity. The Fuel Companies consider this is a potential adverse effect on the ongoing operation, maintenance, and upgrade of these facilities, which are a physical resource that must be managed under the Act. The Fuel Companies anticipate that this will be a wider issue for non-residential activities more generally, which, like fuel industry sites, have demonstrated that they can operate in a range of zones and at zone interfaces.
- 1.3 The Fuel Companies acknowledge that relief is not appropriate in relation to the construction and use of up to three residential dwellings per site in accordance with permitted activity standards in residential zones. However, where consent is required in residential zones, and where residential development is a component of development in Commercial Zones, the Fuel Companies consider that residential amenity and existing activities need to be appropriately protected by provisions which respond to any interfaces with Commercial Zones, or with lawfully established non-residential activities. This is reflected in the *National Medium Density Design Guide (Ministry for the Environment, May 2022)*<sup>1</sup> which encourages new development to respond to existing or proposed nearby non-residential activities.
- 1.4 To this effect, the Fuel Companies seek that PC14 be amended to ensure that reverse sensitivity effects on existing lawfully established non-residential activities are minimised. This could be achieved by amending the following provisions as set out in the following table (deletions in double strikethrough, additions in double underline). Alternative relief may achieve the same outcome.

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<sup>1</sup> <https://environment.govt.nz/publications/national-medium-density-design-guide/>, accessed on 13 September 2022

Table 1: Fuel Companies submission

Sub Point	Plan Provision	Position	Reason	Relief Sought
<b>Chapter 5 – Natural Hazards</b>				
1	5.2.2.5.1 Policy – Managing development in Qualifying Matter Coastal Hazard Management Areas	Support but clarity sought	<p>The intent of this policy is supported but clarity is sought on the phrase ‘intensification of any site’ in Clause (a). The Fuel Companies assume this policy relates to development, subdivision and land use that provides for higher density residential activities (as reflected by the intent of PC14) rather than, for example, development (e.g. new buildings) that support existing non-residential activities.</p> <p>The Fuel Companies assume that Clauses (a) and (b) are both standalone policies with Clause (a) providing direction on managing risk associated with higher residential densities or ‘intensification’ with Clause (b) providing direction on buildings associated with all activities (i.e. not just residential activities). This interpretation would appear consistent with the corresponding rule framework (5.4A) which applies to all new buildings, earthworks and stormwater instead of just those relating to residential activities or residential intensification. Clarity is sought in this regard.</p>	<p><b>Retain</b> as notified</p> <p><u>AND</u></p> <p><b>Clarify</b> that the phrase ‘intensification of any site’ in Clause (a) only relates to higher density residential activities (i.e. not new developments associated with non-residential activities) and that Clause (b) applies to all buildings rather than just those associated with residential activities or residential intensification.</p>
2	5.2.2.5.2 Policy – Managing development within Qualifying Matter Tsunami Management Area	Support	As above, the Fuel Companies assume ‘intensification’ relates to an increase in residential activities in the QM area rather than non-residential development. Notwithstanding, the Fuel Companies support that development, subdivision and land use can be undertaken on the basis that the risk to life is acceptable.	<b>Retain</b> as notified
3	5.4A Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Tsunami Management Area	Support	The Fuel Companies support these rules and seek they are retained as notified.	<b>Retain</b> as notified
<b>Chapter 6 – General Rules</b>				
<b>Sub-chapter 6.5 Scheduled Activities</b>				
4	Entire Chapter	Support	<p>The Fuel Companies operate service stations in operative residential zones and which are listed as Scheduled Activities in Rule 6.5.6.</p> <p>PC14 proposes changes to Chapter 6.5 to reflect that these service stations will be located in one of the proposed residential zones (e.g. Medium Density Residential Zone) but proposes no substantive changes to any rules, standards or matters of discretion. The Fuel Companies support this approach.</p>	<b>Retain</b> as notified
<b>Chapter 8 – Subdivision, Development and Earthworks</b>				
5	8.9A Rules – Development and Activities in Wastewater Constraint Areas	Support in part	<p>The Fuel Companies support the intent of these rules which seek to manage new or expanded activities in Waste Water Constraint Areas.</p> <p>The Fuel Companies assume the ‘expansion of activities beyond those that existing prior to 17 March 2023’ relates to amended activities that would generate greater volumes of wastewater as opposed to maintenance, upgrades or new buildings (e.g. Electric</p>	<p><b>Retain</b> as notified</p> <p><u>AND</u></p> <p><b>Clarify</b> that the rule only applies when the volume of wastewater discharged is or could be increased and is therefore not applicable to smaller scale activities that do not affect wastewater discharge volumes</p>

Sub Point	Plan Provision	Position	Reason	Relief Sought
			Vehicle charging stations, replacement of underground infrastructure such as a stormwater treatment device, stormwater tanks or a new or replacement petrol or diesel storage tank, that would not increase the wastewater discharge from the site). Clarity is sought in this regard.	
<b>Chapter 14 – Residential</b>				
<b>14.2. Objectives and Policies</b>				
9	14.2.3.7 Policy – Management of increased building heights	Support in part	Occupiers in taller residential buildings are more likely to perceive adverse noise and nuisance effects compared to existing standalone dwellings (as generally enabled under the operative plan) and therefore have the potential to generate reverse sensitivity effects on existing lawfully established non-residential activities. The Fuel Companies consider that direction should be provided in this policy to incorporate consideration of design features that reduce potential reverse sensitivity effects that will result in better amenity outcomes for future residents and protect the ongoing operation of existing non-residential activities.	<p><b>Amend</b> Policy 14.2.3.7 as follows:</p> <p>a. <u>Within medium and high density zoned areas, only provide for increased building heights beyond those enabled in the zone or precinct where the following is achieved:</u></p> <ul style="list-style-type: none"> <li>i. <u>the development provides for a greater variety of housing types, price points, and sizes, when compared to what is provided in the surrounding area;</u></li> <li>ii. <u>the development is consistent with the built form outcomes anticipated by the underlying zone or precinct;</u></li> <li>iii. <u>the site is located within walking distance of public or active transport corridors; community facilities or commercial activities; and public open space;</u></li> <li>iv. <u>building design features are used to reduce:</u> <ul style="list-style-type: none"> <li>A. <u>significant shading, dominance and privacy effects caused by increased height on adjacent residential properties and public spaces; and</u></li> <li>B. <u>the effects of dominance and shading on historic heritage, significant trees, or character areas;</u></li> <li>C. <u>reverse sensitivity effects on existing non-residential activities.</u></li> </ul> </li> <li>v. <u>When considering height increases within 1.2km from the city centre, the economic impacts on the city centre from an increase in height.</u></li> </ul>
11	14.2.5.1 Policy – Neighbourhood character, amenity and safety	Support in part	The Fuel Companies support this amended policy, specifically the direction in clause (iv) which seeks to provide for developments which contribute to a high quality environment through a site layout and building design that minimises noise effects from traffic, railway activity and other sources to protect residential amenity which, in turn, reduces the potential for reverse sensitivity effects.	<b>Retain</b> as notified
13	14.2.5.3 Policy – Quality large scale developments	Support in part	For the reasons previously stated and as set out in Paragraphs 1-4 above, the Fuel Companies consider that policy direction is needed for new larger residential developments (i.e. four or more dwellings) to minimise reverse sensitivity effects on existing lawfully established activities.	<p><b>Amend</b> 14.2.5.3 Policy as follows:</p> <p>a. <u>Residential developments of four or more residential units contribute to a high quality residential environment through site layout, building and landscape design to achieve:</u></p> <ul style="list-style-type: none"> <li>i. <u>engagement with the street and other spaces;</u></li> <li>ii. <u>minimisation of the visual bulk of buildings and provision of visual interest;</u></li> <li>iii. <u>high level of internal and external residential amenity;</u></li> <li>iv. <u>high quality shared spaces, including communal living spaces and accessways that provide safe, direct access for pedestrians;</u></li> <li>v. <u>a safe and secure environment; and</u></li> <li>vi. <u>public through connections for large sites with multiple public frontages.</u></li> <li>vii. <u>Minimisation of reverse sensitivity effects on existing lawfully established non-residential activities.</u></li> </ul>
14	14.2.12 Objective – Compatibility with	Support in part	The Fuel Companies support the intent of this objective which seeks to ensure new residential development is compatible with industrial activities. It is considered however that the terms ‘adversely affected’ and ‘does not affect’ are not appropriate	<b>Replace</b> 14.2.12 Objective as follows:

Sub Point	Plan Provision	Position	Reason	Relief Sought
	Industrial Activities (New)		<p>and are more relevant to determining adverse effects for the purposes of Section 95 of the Act.</p> <p>The proposed objective, as notified, also does not acknowledge that residential developments can be susceptible to other effects (e.g. visual, odour, lighting) in addition to noise effects and would not apply to lawfully established industrial activities in non-industrial zones and where potential effects on residential developments and reverse sensitivity effects are also likely to occur.</p> <p>The Fuel Companies consider the relief sought is more comprehensive and better reflects the intention of the objective in ensuring new residential development is compatible with industrial activities.</p>	<p>a. <u>New residential development is not adversely affected by noise generated from industrial activities and the development does not affect the operation of industrial activities within industrial zones.</u></p> <p><u>New residential development is compatible with existing lawfully established industrial activities.</u></p>
15	14.2.12.1 Policy – Managing effects on industrial activities (New)	Support in part	The Fuel Companies support this new policy which provides direction to minimise reverse sensitivity effects on existing and future industrial activities and protect the health and safety of residents. For the reasons set out above, amendments are sought to acknowledge that existing industrial activities not located in industrial zones should similarly be protected from the effects of reverse sensitivity, replace the term ‘adversely affect’ and ensure the amenity of residents is also protected.	<p><b>Amend</b> 14.2.1.2.1 Policy as follows:</p> <p>a. <u>Restrict new residential development of three or more storeys within proximity to existing lawfully established industrial activities and industrial zoned sites where it would give rise to reverse sensitivity effects on industrial activities and/or compromise adversely affect the amenity, health and safety of residents, unless mitigation sufficiently addresses the effects.</u></p>
<b>14.15 Rules – Matters of control and discretion</b>				
<b>14.15.1 Residential Design Principles</b>				
16	Clause (c) – Site layout and context	Support in part	The Fuel Companies support the proposed changes to Clause (c) but consider, for reasons previously stated, that direction is required as to how the development of four more dwellings incorporates design techniques to minimise reverse sensitivity effects on existing non-residential activities.	<p><b>Amend</b> Clause (c) as follows:</p> <p>c. <del>City context and character</del> <u>Site layout and context:</u></p> <p>i. <del>Whether the design of the development is in keeping with, or complements, the scale and character of development anticipated for the surrounding area and relevant significant natural, heritage and cultural features</del> <u>Whether the development achieves high quality design through a logical and coherent site layout that prioritises the street interface, a public frontage for each unit, and safe and direct pedestrian access throughout the development.</u></p> <p>ii. The relevant considerations <del>are</del> <u>include</u> the extent to which the development:</p> <p>....</p> <p><b>G.</b> <u>Incorporates design techniques to minimise reverse sensitivity effects on existing lawfully established non-residential activities.</u></p>
17	Clause (e) – Built form and appearance	Support in part	As above	<p><b>Amend</b> Clause (e) as follows:</p> <p>e. Built form and appearance</p> <p>i. Whether the development is designed to <del>manage</del> <u>minimise</u> the visual bulk of the buildings and provide visual interest.</p> <p>ii. The relevant considerations <del>are</del> <u>include</u> the extent to which the development:</p> <p>...</p> <p><b>F.</b> <u>Incorporates design techniques to minimise reverse sensitivity effects on existing lawfully established non-residential activities.</u></p>
18	Clause (f) – Residential environment	Support in part	As above	<p><b>Amend</b> Clause (f) as follows:</p> <p>e. Residential <del>amenity</del> <u>environment</u></p> <p>i. <del>In relation to the built form and residential amenity of the development on the site (i.e. the overall site prior to the development), whether how the development provides a high level of good internal and external residential amenity for occupants and neighbours is provided.</del></p> <p>ii. The relevant considerations <del>are</del> <u>include</u> the extent to which the development:</p>

Sub Point	Plan Provision	Position	Reason	Relief Sought
				... F. <u>Incorporates design techniques to minimise reverse sensitivity effects on existing lawfully established non-residential activities.</u>
<b>14.15.2 Site Density and Site Coverage</b>				
19	Clause (a)	Support in part	The Fuel Companies consider that where there is an infringement to the relevant Site Density and Site Coverage standards in residential zones, consideration of reverse sensitivity effects is required.	<b>Amend</b> Clause (a) as follows: a. Whether the non-compliance is appropriate to its context taking into account: ... vii. <u>reverse sensitivity effects on existing lawfully established non-residential activities.</u>
<b>14.15.3 Impacts on neighbouring property</b>				
20	Clause (a)	Support in part	The Fuel Companies consider that where taller buildings are proposed and where there are infringements to building setbacks, consideration of reverse sensitivity effects is required.	<b>Amend</b> Clause (a) as follows: a. Whether the increased height, <u>or</u> reduced setbacks, <u>or</u> <del>recession plane intrusion</del> would result in buildings that do not compromise the <del>amenity of adjacent properties</del> planned urban built character. <del>taking into account</del> The following matters of discretion apply: ... viii. <u>reverse sensitivity effects on existing lawfully established non-residential activities.</u>
21	Clause (c)	Support in part	As above	<b>Amend</b> Clause (c) as follows: c. <u>Within the Medium Density Residential zone, for buildings exceeding 14 metres in height, and within the High Density Residential zone, for buildings exceeding 32 metres in height, the matters of discretion are as follows:</u> ... xv. <u>reverse sensitivity effects on existing lawfully established non-residential activities.</u>
<b>14.15.4 Height in relation to boundary breaches</b>				
22	Clause (a)	Support in part	The Fuel Companies consider that where there is an infringement to the height and relation to boundary standards from residential developments, consideration of reverse sensitivity effects is required.	<b>Amend</b> Clause (a) as follows: a. <u>Whether the non-compliance is appropriate to its planned urban built character, taking into account:</u> ... v. <u>reverse sensitivity effects on existing lawfully established non-residential activities.</u>
<b>Chapter 15 – Commercial</b>				
23	15.2.4. Objective – Urban form, scale and design outcomes	Support	The Fuel Companies support the proposed amendments to this objective, particularly Clause (iv) which includes specific direction to manage reverse sensitivity effects on the site and surrounding environment.	<b>Retain</b> as notified
24	15.2.4.2 Policy – Design of new development	Support	The Fuel Companies support the proposed amendments to this objective, noting that the direction to minimise reverse sensitivity effects is not proposed to be changed.	<b>Retain</b> as notified
25	15.14.2.3 Residential Activity Matter of Discretion	Support	The Fuel Companies support the proposed amendments to this objective; in particular, noting that the specific direction to manage reverse sensitivity effects in Lyttelton is not proposed to be changed.	<b>Retain</b> as notified

**SUBMISSION ON PROPOSED PLAN CHANGE 14 TO THE CHRISTCHURCH DISTRICT PLAN  
PURSUANT TO CLAUSE 6 OF THE FIRST SCHEDULE OF THE RESOURCE MANAGEMENT ACT  
1991**

**To:** Christchurch City Council  
PO Box 73012  
Christchurch 8154

Via email: [engagement@ccc.govt.nz](mailto:engagement@ccc.govt.nz)

**Submitter:** bp Oil New Zealand Limited  
PO Box 99 873  
Auckland 1149

Mobil Oil New Zealand Limited  
PO Box 1709  
Auckland 1140

Z Energy Limited  
PO Box 2091  
Wellington 6140

*Hereafter referred to as The Fuel Companies*

**Address for Service:** 4Sight Consulting Limited  
201 Victoria Street West  
Auckland Central  
Auckland 1010

Attention: Jarrod Dixon  
Phone: 021 948 073  
Email: [jarrod.dixon@4sight.co.nz](mailto:jarrod.dixon@4sight.co.nz)



## A. INTRODUCTION

Christchurch City Council (*Council*) is a Tier 1 authority and required to implement the intensification policies of the National Policy Statement for Urban Development (*NPS:UD*) and Medium Density Residential Standards (*MDRS*) to enable greater housing choice throughout Christchurch's urban environments (*the district*). Council has notified Proposed Plan Change 14 to its district plan (*PC14*) in response to these requirements.

bp Oil New Zealand Limited, Mobil Oil New Zealand Limited, and Z Energy Limited (*the Fuel Companies*) receive, store, and distribute refined petroleum products around New Zealand. In Christchurch, the Fuel Companies' business includes retail fuel outlets, namely service stations and truck stops, and supply to commercial facilities. The Fuel Companies also have aviation facilities and bulk fuel storage facilities (*terminals*) and associated pipelines. The terminals are recognised in the Christchurch District Plan (*District Plan*) as critical and strategic infrastructure.

These existing activities include the storage and use of hazardous substances (typically petrol, diesel, and LPG), the refuelling of vehicles, and often other vehicle services (air pump, car wash, etc.), and retail activities. Fuel deliveries are undertaken via tankers which occur infrequently but often without restriction in terms of frequency or times. All sites have established vehicle crossings for access and exit, buildings, and signage (often illuminated). Pump stations are located beneath a forecourt canopy which is usually lit via under canopy lighting. Hours of operation vary and are not infrequently 24/7. These sites are required to comply with permitted noise limits of the district plan or limits otherwise included as conditions in an approved land use consent. The Fuel Companies' sites operate in accordance with Emergency Management Plans detailing procedures in case of emergency, including spills of hazardous substances.

These retail fuel activities are located in a variety of zones, including at the edge of zones, and it is not unusual for these sites to immediately adjoin boundaries with residential zones (often where those residential activities are of lower density than anticipated by the NPS:UD and MDRS) or residential activities. While retail fuel activities can and do occur appropriately in a range of environments/zones, the perceived acceptability of potential adverse effects can be influenced by the intensity and nature of adjoining activities. This submission relates primarily to the interface of proposed higher density residential activities with existing lawfully established non-residential activities.

## B. THE SPECIFIC PROVISIONS OF PROPOSED PLAN CHANGE 14 TO THE OPERATIVE PLAN THAT THE FUEL COMPANIES' SUBMISSION RELATES TO ARE SUMMARISED AS FOLLOWS

The specific provisions submitted on, the rationale for The Fuel Companies' submission on each of these matters, and the relief sought is contained in the schedule below. Specific changes sought to the provisions (as proposed) are highlighted **yellow** with deletions in ~~double strikethrough~~ and additions in double underline. The Fuel Companies support alternative relief that achieves the same outcome(s).

In addition to the specific outcomes and relief sought, the following general relief is sought:

- a) Achieve the following:
  - i. The purpose and principles of the Resource Management Act 1991 (*RMA*) and consistency with the relevant provisions in Sections 6 - 8 RMA;
  - ii. Give effect to the Canterbury Regional Policy Statement;
  - iii. Assist the Council to carry out its functions under Section 31 RMA;
  - iv. Meet the requirements of the statutory tests in Section 32 RMA; and
  - v. Avoid, remedy or mitigate any relevant and identified environmental effects;

- b) Make any alternative or consequential relief as required to give effect to this submission, including any consequential relief required in any other sections of the proposed plan that are not specifically subject of this submission but where consequential changes are required to ensure a consistent approach is taken throughout the document; and
- c) Any other relief required to give effect to the issues raised in this submission.

- C. THE FUEL COMPANIES WISH TO BE HEARD IN SUPPORT OF THIS SUBMISSION.**
- D. IF OTHERS MAKE SIMILAR SUBMISSIONS THE FUEL COMPANIES MAY BE PREPARED TO CONSIDER PRESENTING A JOINT CASE WITH THEM AT ANY HEARING.**
- E. THE FUEL COMPANIES COULD NOT GAIN AN ADVANTAGE IN TRADE COMPETITION THROUGH THIS SUBMISSION.**
- F. THE FUEL COMPANIES ARE DIRECTLY AFFECTED BY AN EFFECT OF THE SUBJECT MATTER OF THE SUBMISSION THAT –**
  - I. ADVERSELY AFFECTS THE ENVIRONMENT; AND**
  - II. DOES NOT RELATE TO TRADE COMPETITION OR THE EFFECTS OF TRADE COMPETITION.**

Signed on behalf of Z Energy Limited, bp Oil New Zealand Limited and Mobil Oil New Zealand Limited



Jarrod Dixon  
Senior Planner

Date this 3<sup>rd</sup> May 2023

## SCHEDULE A – INTENSIFICATION

- 1.1 The Fuel Companies appreciate intensification changes are required under either the NPS:UD or the MDRS with little to no discretion on their applicability, other than for qualifying matters, and are neutral to them subject to ensuring reverse sensitivity effects on lawfully established retail fuel activities are appropriately managed.
- 1.2 PC14 will alter development potential around these facilities with corresponding potential to give rise to reverse sensitivity effects including nuisance effects (e.g. noise and lighting) and amenity effects. For instance, an occupier of a terraced apartment or residential occupier of a multi storey mixed use development is more likely to perceive noise and visual effects compared to an occupier of single-storey dwelling and, more than likely, setback from the boundary and screened by a fence and landscaping, or commercial activity. The Fuel Companies consider this is a potential adverse effect on the ongoing operation, maintenance, and upgrade of these facilities, which are a physical resource that must be managed under the Act. The Fuel Companies anticipate that this will be a wider issue for non-residential activities more generally, which, like fuel industry sites, have demonstrated that they can operate in a range of zones and at zone interfaces.
- 1.3 The Fuel Companies acknowledge that relief is not appropriate in relation to the construction and use of up to three residential dwellings per site in accordance with permitted activity standards in residential zones. However, where consent is required in residential zones, and where residential development is a component of development in Commercial Zones, the Fuel Companies consider that residential amenity and existing activities need to be appropriately protected by provisions which respond to any interfaces with Commercial Zones, or with lawfully established non-residential activities. This is reflected in the *National Medium Density Design Guide (Ministry for the Environment, May 2022)*<sup>1</sup> which encourages new development to respond to existing or proposed nearby non-residential activities.
- 1.4 To this effect, the Fuel Companies seek that PC14 be amended to ensure that reverse sensitivity effects on existing lawfully established non-residential activities are minimised. This could be achieved by amending the following provisions as set out in the following table (deletions in double strikethrough, additions in double underline). Alternative relief may achieve the same outcome.

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<sup>1</sup> <https://environment.govt.nz/publications/national-medium-density-design-guide/>, accessed on 13 September 2022

Table 1: Fuel Companies submission

Sub Point	Plan Provision	Position	Reason	Relief Sought
<b>Chapter 5 – Natural Hazards</b>				
1	5.2.2.5.1 Policy – Managing development in Qualifying Matter Coastal Hazard Management Areas	Support but clarity sought	<p>The intent of this policy is supported but clarity is sought on the phrase ‘intensification of any site’ in Clause (a). The Fuel Companies assume this policy relates to development, subdivision and land use that provides for higher density residential activities (as reflected by the intent of PC14) rather than, for example, development (e.g. new buildings) that support existing non-residential activities.</p> <p>The Fuel Companies assume that Clauses (a) and (b) are both standalone policies with Clause (a) providing direction on managing risk associated with higher residential densities or ‘intensification’ with Clause (b) providing direction on buildings associated with all activities (i.e. not just residential activities). This interpretation would appear consistent with the corresponding rule framework (5.4A) which applies to all new buildings, earthworks and stormwater instead of just those relating to residential activities or residential intensification. Clarity is sought in this regard.</p>	<p><b>Retain</b> as notified</p> <p><u>AND</u></p> <p><b>Clarify</b> that the phrase ‘intensification of any site’ in Clause (a) only relates to higher density residential activities (i.e. not new developments associated with non-residential activities) and that Clause (b) applies to all buildings rather than just those associated with residential activities or residential intensification.</p>
2	5.2.2.5.2 Policy – Managing development within Qualifying Matter Tsunami Management Area	Support	As above, the Fuel Companies assume ‘intensification’ relates to an increase in residential activities in the QM area rather than non-residential development. Notwithstanding, the Fuel Companies support that development, subdivision and land use can be undertaken on the basis that the risk to life is acceptable.	<b>Retain</b> as notified
3	5.4A Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Tsunami Management Area	Support	The Fuel Companies support these rules and seek they are retained as notified.	<b>Retain</b> as notified
<b>Chapter 6 – General Rules</b>				
<b>Sub-chapter 6.5 Scheduled Activities</b>				
4	Entire Chapter	Support	<p>The Fuel Companies operate service stations in operative residential zones and which are listed as Scheduled Activities in Rule 6.5.6.</p> <p>PC14 proposes changes to Chapter 6.5 to reflect that these service stations will be located in one of the proposed residential zones (e.g. Medium Density Residential Zone) but proposes no substantive changes to any rules, standards or matters of discretion. The Fuel Companies support this approach.</p>	<b>Retain</b> as notified
<b>Chapter 8 – Subdivision, Development and Earthworks</b>				
5	8.9A Rules – Development and Activities in Wastewater Constraint Areas	Support in part	<p>The Fuel Companies support the intent of these rules which seek to manage new or expanded activities in Waste Water Constraint Areas.</p> <p>The Fuel Companies assume the ‘expansion of activities beyond those that existing prior to 17 March 2023’ relates to amended activities that would generate greater volumes of wastewater as opposed to maintenance, upgrades or new buildings (e.g. Electric</p>	<p><b>Retain</b> as notified</p> <p><u>AND</u></p> <p><b>Clarify</b> that the rule only applies when the volume of wastewater discharged is or could be increased and is therefore not applicable to smaller scale activities that do not affect wastewater discharge volumes</p>

Sub Point	Plan Provision	Position	Reason	Relief Sought
			Vehicle charging stations, replacement of underground infrastructure such as a stormwater treatment device, stormwater tanks or a new or replacement petrol or diesel storage tank, that would not increase the wastewater discharge from the site). Clarity is sought in this regard.	
<b>Chapter 14 – Residential</b>				
<b>14.2. Objectives and Policies</b>				
9	14.2.3.7 Policy – Management of increased building heights	Support in part	Occupiers in taller residential buildings are more likely to perceive adverse noise and nuisance effects compared to existing standalone dwellings (as generally enabled under the operative plan) and therefore have the potential to generate reverse sensitivity effects on existing lawfully established non-residential activities. The Fuel Companies consider that direction should be provided in this policy to incorporate consideration of design features that reduce potential reverse sensitivity effects that will result in better amenity outcomes for future residents and protect the ongoing operation of existing non-residential activities.	<p><b>Amend</b> Policy 14.2.3.7 as follows:</p> <p>a. <u>Within medium and high density zoned areas, only provide for increased building heights beyond those enabled in the zone or precinct where the following is achieved:</u></p> <ol style="list-style-type: none"> <li>i. <u>the development provides for a greater variety of housing types, price points, and sizes, when compared to what is provided in the surrounding area;</u></li> <li>ii. <u>the development is consistent with the built form outcomes anticipated by the underlying zone or precinct;</u></li> <li>iii. <u>the site is located within walking distance of public or active transport corridors; community facilities or commercial activities; and public open space;</u></li> <li>iv. <u>building design features are used to reduce:</u> <ol style="list-style-type: none"> <li>A. <u>significant shading, dominance and privacy effects caused by increased height on adjacent residential properties and public spaces; and</u></li> <li>B. <u>the effects of dominance and shading on historic heritage, significant trees, or character areas;</u></li> <li>C. <u>reverse sensitivity effects on existing non-residential activities.</u></li> </ol> </li> <li>v. <u>When considering height increases within 1.2km from the city centre, the economic impacts on the city centre from an increase in height.</u></li> </ol>
11	14.2.5.1 Policy – Neighbourhood character, amenity and safety	Support in part	The Fuel Companies support this amended policy, specifically the direction in clause (iv) which seeks to provide for developments which contribute to a high quality environment through a site layout and building design that minimises noise effects from traffic, railway activity and other sources to protect residential amenity which, in turn, reduces the potential for reverse sensitivity effects.	<b>Retain</b> as notified
13	14.2.5.3 Policy – Quality large scale developments	Support in part	For the reasons previously stated and as set out in Paragraphs 1-4 above, the Fuel Companies consider that policy direction is needed for new larger residential developments (i.e. four or more dwellings) to minimise reverse sensitivity effects on existing lawfully established activities.	<p><b>Amend</b> 14.2.5.3 Policy as follows:</p> <p>a. <u>Residential developments of four or more residential units contribute to a high quality residential environment through site layout, building and landscape design to achieve:</u></p> <ol style="list-style-type: none"> <li>i. <u>engagement with the street and other spaces;</u></li> <li>ii. <u>minimisation of the visual bulk of buildings and provision of visual interest;</u></li> <li>iii. <u>high level of internal and external residential amenity;</u></li> <li>iv. <u>high quality shared spaces, including communal living spaces and accessways that provide safe, direct access for pedestrians;</u></li> <li>v. <u>a safe and secure environment; and</u></li> <li>vi. <u>public through connections for large sites with multiple public frontages.</u></li> <li>vii. <u>Minimisation of reverse sensitivity effects on existing lawfully established non-residential activities.</u></li> </ol>
14	14.2.12 Objective – Compatibility with	Support in part	The Fuel Companies support the intent of this objective which seeks to ensure new residential development is compatible with industrial activities. It is considered however that the terms ‘adversely affected’ and ‘does not affect’ are not appropriate	<b>Replace</b> 14.2.12 Objective as follows:

Sub Point	Plan Provision	Position	Reason	Relief Sought
	Industrial Activities (New)		<p>and are more relevant to determining adverse effects for the purposes of Section 95 of the Act.</p> <p>The proposed objective, as notified, also does not acknowledge that residential developments can be susceptible to other effects (e.g. visual, odour, lighting) in addition to noise effects and would not apply to lawfully established industrial activities in non-industrial zones and where potential effects on residential developments and reverse sensitivity effects are also likely to occur.</p> <p>The Fuel Companies consider the relief sought is more comprehensive and better reflects the intention of the objective in ensuring new residential development is compatible with industrial activities.</p>	<p>a. <u>New residential development is not adversely affected by noise generated from industrial activities and the development does not affect the operation of industrial activities within industrial zones.</u></p> <p><u>New residential development is compatible with existing lawfully established industrial activities.</u></p>
15	14.2.12.1 Policy – Managing effects on industrial activities (New)	Support in part	The Fuel Companies support this new policy which provides direction to minimise reverse sensitivity effects on existing and future industrial activities and protect the health and safety of residents. For the reasons set out above, amendments are sought to acknowledge that existing industrial activities not located in industrial zones should similarly be protected from the effects of reverse sensitivity, replace the term ‘adversely affect’ and ensure the amenity of residents is also protected.	<p><b>Amend</b> 14.2.1.2.1 Policy as follows:</p> <p>a. <u>Restrict new residential development of three or more storeys within proximity to existing lawfully established industrial activities and industrial zoned sites where it would give rise to reverse sensitivity effects on industrial activities and/or compromise adversely affect the amenity, health and safety of residents, unless mitigation sufficiently addresses the effects.</u></p>
<b>14.15 Rules – Matters of control and discretion</b>				
<b>14.15.1 Residential Design Principles</b>				
16	Clause (c) – Site layout and context	Support in part	The Fuel Companies support the proposed changes to Clause (c) but consider, for reasons previously stated, that direction is required as to how the development of four more dwellings incorporates design techniques to minimise reverse sensitivity effects on existing non-residential activities.	<p><b>Amend</b> Clause (c) as follows:</p> <p>c. <del>City context and character</del> <u>Site layout and context:</u></p> <p>i. <del>Whether the design of the development is in keeping with, or complements, the scale and character of development anticipated for the surrounding area and relevant significant natural, heritage and cultural features</del> <u>Whether the development achieves high quality design through a logical and coherent site layout that prioritises the street interface, a public frontage for each unit, and safe and direct pedestrian access throughout the development.</u></p> <p>ii. The relevant considerations <del>are</del> <u>include</u> the extent to which the development:</p> <p>....</p> <p><b>G.</b> <u>Incorporates design techniques to minimise reverse sensitivity effects on existing lawfully established non-residential activities.</u></p>
17	Clause (e) – Built form and appearance	Support in part	As above	<p><b>Amend</b> Clause (e) as follows:</p> <p>e. Built form and appearance</p> <p>i. Whether the development is designed to <del>manage</del> <u>minimise</u> the visual bulk of the buildings and provide visual interest.</p> <p>ii. The relevant considerations <del>are</del> <u>include</u> the extent to which the development:</p> <p>...</p> <p><b>F.</b> <u>Incorporates design techniques to minimise reverse sensitivity effects on existing lawfully established non-residential activities.</u></p>
18	Clause (f) – Residential environment	Support in part	As above	<p><b>Amend</b> Clause (f) as follows:</p> <p>e. Residential <del>amenity</del> <u>environment</u></p> <p>i. <del>In relation to the built form and residential amenity of the development on the site (i.e. the overall site prior to the development), whether how the development provides a high level of good internal and external residential amenity for occupants and neighbours is provided.</del></p> <p>ii. The relevant considerations <del>are</del> <u>include</u> the extent to which the development:</p>

Sub Point	Plan Provision	Position	Reason	Relief Sought
				... F. <u>Incorporates design techniques to minimise reverse sensitivity effects on existing lawfully established non-residential activities.</u>
<b>14.15.2 Site Density and Site Coverage</b>				
19	Clause (a)	Support in part	The Fuel Companies consider that where there is an infringement to the relevant Site Density and Site Coverage standards in residential zones, consideration of reverse sensitivity effects is required.	<b>Amend</b> Clause (a) as follows: a. Whether the non-compliance is appropriate to its context taking into account: ... vii. <u>reverse sensitivity effects on existing lawfully established non-residential activities.</u>
<b>14.15.3 Impacts on neighbouring property</b>				
20	Clause (a)	Support in part	The Fuel Companies consider that where taller buildings are proposed and where there are infringements to building setbacks, consideration of reverse sensitivity effects is required.	<b>Amend</b> Clause (a) as follows: a. Whether the increased height, <u>or</u> reduced setbacks, <u>or</u> <del>recession plane intrusion</del> would result in buildings that do not compromise the <u>amenity of adjacent properties</u> planned urban built character. <del>taking into account</del> The following matters of discretion apply: ... viii. <u>reverse sensitivity effects on existing lawfully established non-residential activities.</u>
21	Clause (c)	Support in part	As above	<b>Amend</b> Clause (c) as follows: c. <u>Within the Medium Density Residential zone, for buildings exceeding 14 metres in height, and within the High Density Residential zone, for buildings exceeding 32 metres in height, the matters of discretion are as follows:</u> ... xv. <u>reverse sensitivity effects on existing lawfully established non-residential activities.</u>
<b>14.15.4 Height in relation to boundary breaches</b>				
22	Clause (a)	Support in part	The Fuel Companies consider that where there is an infringement to the height and relation to boundary standards from residential developments, consideration of reverse sensitivity effects is required.	<b>Amend</b> Clause (a) as follows: a. <u>Whether the non-compliance is appropriate to its planned urban built character, taking into account:</u> ... v. <u>reverse sensitivity effects on existing lawfully established non-residential activities.</u>
<b>Chapter 15 – Commercial</b>				
23	15.2.4. Objective – Urban form, scale and design outcomes	Support	The Fuel Companies support the proposed amendments to this objective, particularly Clause (iv) which includes specific direction to manage reverse sensitivity effects on the site and surrounding environment.	<b>Retain</b> as notified
24	15.2.4.2 Policy – Design of new development	Support	The Fuel Companies support the proposed amendments to this objective, noting that the direction to minimise reverse sensitivity effects is not proposed to be changed.	<b>Retain</b> as notified
25	15.14.2.3 Residential Activity Matter of Discretion	Support	The Fuel Companies support the proposed amendments to this objective; in particular, noting that the specific direction to manage reverse sensitivity effects in Lyttelton is not proposed to be changed.	<b>Retain</b> as notified

**Cui, Aviva**

---

**From:** Jarrod Dixon <jarrod.dixon@4sight.co.nz>  
**Sent:** Wednesday, 3 May 2023 4:32 pm  
**To:** Engagement  
**Subject:** Fuel Companies Submission on PC14  
**Attachments:** Fuel Companies Submission\_PC14 of the Christchurch District Plan.pdf

Hi there,

Please find attached to this email a submission prepared on behalf of Z Energy Limited, bp Oil New Zealand Limited, and Mobil Oil New Zealand Limited (*the Fuel Companies*) on PC14 of the Christchurch District Plan.

Please acknowledge receipt and if you have any issues accessing the attached.

Ngā mihi

**Jarrod Dixon**

Senior Planner  
021 948 073



201 Victoria Street West, Auckland Central 1010  
PO Box 911 310, Victoria St West, Auckland 1142  
[4Sight.Consulting](http://4Sight.Consulting)

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

## Submitter Details

**Submission Date:** 04/05/2023

**First name:** Glen **Last name:** Ealam

**Preferred method of contact** Email

**Postal address:** 43 Billington Drive

**Suburb:** Halswell

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8025

**Email:** ealamg@hotmail.com

**Daytime Phone:** 027 2522380

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

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

Note to person making submission:

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

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 13.1

- Support
- Oppose
- Seek Amendment

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

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

**My submission is that**

In Halswell around Country Palms a lot is flagged as medium density residential. I am OK with this provided that the area itself has improvements to support this. As an example this area has very few commercial areas

specifically for retail shopping/cafes and bars. In order to get to these types of areas a car is needed as the bus system does not support the travel to the closest retail malls the Hub in Hornby and Riccarton Mall.

With higher density you should really provide a better carless option for residents. This should be areas designated for retail shopping/entertainment. This will mean people can walk or bike easily to these areas. The alternative is that people living in the higher density will need cars. High density means less parking options so cars will be parked on the side of the roads. This also means higher volumes of traffic. Otherwise better public transport options should be provided to encourage less cars.

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#### Attached Documents

File
No records to display.

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

## Submitter Details

**Submission Date:** 04/05/2023

**First name:** michael **Last name:** boissard

**Preferred method of contact** Postal

**Postal address:** 83 Rugby Street

**Suburb:** Merivale

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8014

**Daytime Phone:** 0272037456

I could not

Gain an advantage in trade competition through this submission

I am not

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

a. adversely affects the environment, and

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

Note to person making submission:

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

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 14.1

Support

Oppose

Seek Amendment

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

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

**My submission is that**

Your proposal will destroy the character of a very pleasant part of the city. Also there appears to be no provision for the amenities that will be required by the increased population.

Attached Documents

File

No records to display.

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

## Submitter Details

**Submission Date:** 04/05/2023

**First name:** Graham Thomas **Last name:** Blackett

**Preferred method of contact** Email

**Postal address:** Unit 4, 14 Bishop Street

**Suburb:** St Albans

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8014

**Email:** Blackett@snap.net.nz

**Daytime Phone:** 021910025

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

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

Note to person making submission:

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 15.1

- Support
- Oppose
- Seek Amendment

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

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

**My submission is that**

6.1 Rules relating to greater sunlight access for homes. Please see detailed submission attached.

**Original Submitter:**

**Original Point:**

**Points:** 15.2

- 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**

14.5/14.6: Designed areas for High and Medium Density Residential Zones within St Albans, north of city center. Please see the detailed submission attached.

Attached Documents

File
Graham Blackett 1CCC St Albans Plan Change May 2023 GB3 Canon_000450
Graham Blackett 2CCC St Albans Plan Change May 2023 GB2 Bishop_000449
Graham Blackett Email CCC St Albans Plan Change May 2023 GB3 Canon_000450

Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

Gender:  Male  Female  Non-binary/another gender

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

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

## \* Required information

Name\* Graham Thomas Blackett  
Address\* 47 Canon street Chch Postcode\* \_\_\_\_\_  
Email blackett@snap.net.nz Phone no. 021 9100 25

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

Organisation's name n/a  
Your role n/a

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

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

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

(a) adversely affects the environment, and

(b) does not relate to the trade competition or the effects of trade competition? N/A  Yes  No

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

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

I wish to speak in support of my submission on Plan Change 13

I wish to speak in support of my submission on Plan Change 14

I do not wish to speak.

## Joint submissions (Please tick this box if you agree)

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

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

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

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

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

## Have your say

### Housing and Business Choice Plan Change 14

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

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

1. Designated areas for High and Medium Density Residential Zones within St Albans, north of city centre
2. Rules relating to greater sunlight access for homes.

My submission is that:\*

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

Since the earthquakes this area has been very much redeveloped and rebuilt with many new townhouses. It seems hardly fair to now change the rules and allow much taller developments. Many residents have spent considerable amounts of money on new townhouses in the belief they would never have excessively tall builds next door. This is one of the main reasons they brought in St Albans rather than inside the Four Avenues. The Four Avenues is better suited with better public transport and the expectation of large buildings. St Albans already has a car congestion problem without high density developments

I seek the following decision from the Council:\*

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

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

1. Re-designation of the St Albans residential area north of Bealey Avenue and south of Edgware Road as a Medium Density Residential Zone.
2. Adjustment of the proposed recession planes on new buildings to allow for sunlight to directly reach the ground floors of existing, adjoining dwellings for at least some portion of everyday of the year.



**Cui, Aviva**

---

**From:** graham blackett <blackett@snap.net.nz>  
**Sent:** Wednesday, 3 May 2023 10:58 am  
**To:** Engagement  
**Subject:** Housing and Business Choice Plan Change 14 Submission  
**Attachments:** CCC St Albans Plan Change May 2023 GB3 Canon\_000450.pdf; CCC St Albans Plan Change May 2023 GB2 Bishop\_000449.pdf

Hi Guys,

My submission for Housing and Business Plan Change 14 is attached.

Cheer

Graham

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

## Submitter Details

**Submission Date:** 04/05/2023

**First name:** Russell **Last name:** Wills

**Preferred method of contact** Email

### Postal address:

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** russellwills251@gmailcom

**Daytime Phone:** 0277133087

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

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

Note to person making submission:

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

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 16.1

- Support
- Oppose
- Seek Amendment

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

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

Greater Hornby Christchurch

### My submission is that

Infrastructure in Hornby can't cope now poor roads overflowing waste water pipes nothing but congestion on road networks look farcical crime increase vehicles parked on rds Hornby saw large migration of residents after earthquake never recovered we have no space additional greenspaces to cope projected growth any more growth would be detrimental to our suburb

## Attached Documents

File
No records to display.

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

## Submitter Details

**Submission Date:** 04/05/2023

**First name:** Catharina **Last name:** Schupbach

**Preferred method of contact:** Email

### Postal address:

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** Cats@swz.co.nz

**Daytime Phone:** 942-8125

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

I am  
directly affected by an effect of the subject matter of the submission that :  
a. adversely affects the environment, and  
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Note to person making submission:

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

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 17.1

- Support
- Oppose
- Seek Amendment

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

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

I wish to see Evesham Crescent and Bewdley Street made a Residential Character Area under Plan Change 14

I think it is a great idea! The reasons are obvious, nobody wants 2 story flats right next to their property invading their privacy.

Increased noise levels, diminished light and sun will totally change the feel of this area.

Furthermore this area has finally become a lot more 'green'. I hope we can keep it this way.

The more trees the better!

**My submission is that**

---

Attached Documents

File
No records to display.

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

## Submitter Details

**Submission Date:** 04/05/2023

**First name:** Julia **Last name:** van Essen

**Preferred method of contact** Email

**Postal address:** 38 Kathleen Crescent

**Suburb:** Hornby

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8042

**Email:** julia.van.essen@gmail.com

**Daytime Phone:** 0211460320

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

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

Note to person making submission:

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

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 18.1

- Support
- Oppose
- Seek Amendment

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

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

I seek that the submission process (this webpage) is made simpler to use and less glitchy. After that, submissions should be reopened and more time given for submissions.

I seek that the City Council conducts a review into the social impact of plan change 14.

I seek that the council review the need for the extent of the changes proposed under plan change 14.

I seek that the vote to notify be redone with no duress.

### **My submission is that**

I am opposed to plan change 14. I agree that changes should be made to allow densification in the city centre where it makes sense to have apartment blocks. However, having densification to the degree that the plan allows is not appropriate for the suburbs and will have a hugely negative affect on the quality of life of Christchurch people.

I concerned that this is the second time I am writing a submission on the changes proposed by Plan Change 14. The decision to notify was voted on last year and the vote was "no". When the vote to notify was redone, the City Councillors who changed their vote made it clear that they did not agree with the change. They were voting "yes" based on information that the government were threatening a worse outcome if they did not vote "yes". Therefore, the "yes" vote was made under duress and, as such, is invalid.

There is a problem with this submission process. The process of submissions on Plan change 14 on this website is cumbersome, glitchy and not user friendly. This could deter some people from making submissions which will skew the results.

The rest of my objections to plan change 14 remain the same as my last submission. These were in summary:

Implementing plan change 14 will mean the loss of old established and protected trees from the city canopy as well as reducing the amount of green space in the suburbs. Planting seedlings will not replace this canopy. Trees and green spaces are essential to the health of a city and its inhabitants. Lack of green space has a negative effect on the mental health and wellbeing of its citizens and lack of trees will produce a heat sink in a city already affected by climate change. There has not been an investigation into the social impact of Plan change 14 by the council.

Christchurch is a city build on swampy land and susceptible to liquefaction, earthquakes and flooding. Densification to the extent that Plan change 14 would allow is not practical considering the instability of the land.

The changes that will be implemented under Plan 14 are a huge overkill for what is needed in Christchurch. It feels like the government has simply recycled the plans designed for Auckland and is now pushing them onto Christchurch with no regard for the different needs and pressures here.

---

### Attached Documents

File
No records to display.

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

## Submitter Details

**Submission Date:** 04/05/2023

**First name:** George **Last name:** Booty

**Preferred method of contact** Email

**Postal address:** 2A Westby Street

**Suburb:** Waltham

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8023

**Email:** georgebooty90@live.com

**Daytime Phone:** 0278330399

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

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

Note to person making submission:

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

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 19.1

- 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**

Hello,

We bought a new unit off the plans in Waltham through Brookfield Heritage, and moved in in October 2022.



The house came with bike parking that was open to the weather, visible from the street and with no secure way to lock a bike.

To combat this, I installed my own security bolt to the fence post to lock our second-hand pushbikes through.

However, I wouldn't park an e-bike or more valuable bike out here, because it just doesn't feel secure or protected enough, not to mention the rise in bike thefts, with the average bikes reported stolen to Police a day is at 5, which is quite a lot.

Our place and many others didn't come with off street parking, nor did our house have the option of a garage. Having secure and quality bike parking available for all new homes should be a given, especially given the extensive cycle lanes available in ChCh. I would LOVE to buy an e-bike, especially now I am a new dad, I see the cargo bikes and think 'I want one of those', but given our situation at home, I'll never buy one because it's just not safe enough, which is the sad reality.... Unless I moved house, which is out of the question for now.. I just have to stick to cheaper, second hand, bikes, to settle any nerves of bikes being stolen.

With regards to the district plan, the amendments I am seeking are:

- That bike parking be required to be enclosed and weatherproof and lockable to prevent theft.
- That CCC need to consider whether a new resident would be comfortable storing a \$5000 e-bike within their home boundaries (garden shed etc).

---

#### Attached Documents

File
------

No records to display.

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

## Submitter Details

**Submission Date:** 04/05/2023

**First name:** Martin **Last name:** Snelson

**Preferred method of contact** Email

**Postal address:** 9 Euphrasie Drive

**Suburb:** Aidanfield

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8025

**Email:** snelsonchch@hotmail.com

**Daytime Phone:** 0274375055

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 20.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

**My submission is that**

See the detailed submission attached.

Relevant to 6,1A, 14.5, 14.6

---

Attached Documents

File
M Snelson PC14 email
M Snelson PC14 attachment

**Cui, Aviva**

---

**From:** Martin Snelson <snelsonchch@hotmail.com>  
**Sent:** Wednesday, 3 May 2023 6:10 pm  
**To:** Engagement  
**Subject:** Feedback on Our proposed Housing and Business Choice Plan Change (PC14) / 531  
**Attachments:** M Snelson housing&business choice plan change 14.pdf; C Snelson housing & business choice plan change 14.pdf

Good evening

We have been trying for some time to submit a submission for this plan and keep getting an alert notice that we have to provide answers to questions, which we have checked and found everything had been completed!

We have been advised by council to email our submission directly to you as the online platform appears to fail.

Please find attached two submissions.

Regards

Martin Snelson  
0274375055  
Sent from [Mail](#) for Windows

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\* Martin Snelson  
Address\* 9 Euphrasie Drive, Aidanfield, Christchurch Postcode\* 8025  
Email snelsonchch@hotmail.com Phone no. 0274 375055

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

Organisation's name —  
Your role —

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

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

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

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

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

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

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

### Joint submissions (Please tick this box if you agree)

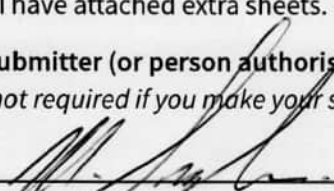
If others make a similar submission, I will consider presenting a joint case with them at the hearing.

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

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

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

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

Signature  Date 03/05/23

# 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.)

Residential 14, Housing + Business Choice Plan Change 14

My submission is that:\*

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

See Additional sheet

I seek the following decision from the Council:\*

(Please give precise details stating what amendments you wish to see made to the proposed Plan Change.  
Please continue on separate sheet(s) if necessary.)

See additional sheet.

st

Have your say Housing and Business Choice Plan Change 14

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

Zoning of parts of North Halswell (Aidanfield) as a High-Density Residential Zone

Updated recession planes /set back from boundary

**My submission is that:**

We oppose, in part, the Housing and Business Choice Plan Change 14 and wish to have them amended due to the affects it has on:

- significantly reduced sunlight hours to our single story's lower floor, especially in winter. We chose our property because of the low heights of housing in the area for our retirement home, with sunlight providing a good quality of life and a healthy, mould free environment. These requirements are essential when aging and with health requirements (lung issues) and mental wellbeing. Lack of sun contributes to producing damaging mould and mildew, adding to health issues.
- adding additional heating costs and added financial burden, particularly as pensioners.
- not being in keeping with the neighbourhood building a 3 or 4 story building. Additional dwellings could pose further noise to what is an extremely quiet neighbourhood.
- There is an empty section behind us on the North East side which means the new rules proposed under Plan Change 14 High Density Zone would significantly impact our sunlight providing no sun through winter in many rooms of our house. Our health and wellbeing would be highly impacted with this change.

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

Amend the HDRZ and MDRZ in the proposed Northern Halswell town centre, to refer to the areas being developed, and not to those newly built areas.

Amend the recession plane angles and setbacks to maximise sunlight to existing single story buildings in existing subdivisions

Amend by removing the requirement for minimum two storey housing.

To amend the proposed changes to include an increased set back of the new building and altering recession planes to ensure maximum/more sunlight hours to neighbouring properties in established new suburbs.

To plan to maintain the quality of the quiet, sunny, healthy environment in keeping with the single and occasional two-story neighbourhood that the Aidanfield subdivision was designed for and use new subdivision developments to obtain higher density living.

**ME & C Snelson**

**9 Euphrasie Drive**

**Christchurch 8025**

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

## Submitter Details

**Submission Date:** 04/05/2023

**First name:** Cynthia **Last name:** Snelson

**Preferred method of contact** Email

**Postal address:** 9 Euphrasie Drive

**Suburb:** Aidanfield

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8025

**Email:** snelsonchch@gmail.com

**Daytime Phone:** 0272083096

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:

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 21.1

- Support
- Oppose
- Seek Amendment



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

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

**My submission is that**

6.1A, 14.5, 14.6-see detailed submission attached.

---

Attached Documents

File
M Snelson PC14 email
C Snelson PC14 attachment

**Cui, Aviva**

---

**From:** Martin Snelson <snelsonchch@hotmail.com>  
**Sent:** Wednesday, 3 May 2023 6:10 pm  
**To:** Engagement  
**Subject:** Feedback on Our proposed Housing and Business Choice Plan Change (PC14) / 531  
**Attachments:** M Snelson housing&business choice plan change 14.pdf; C Snelson housing & business choice plan change 14.pdf

Good evening

We have been trying for some time to submit a submission for this plan and keep getting an alert notice that we have to provide answers to questions, which we have checked and found everything had been completed!

We have been advised by council to email our submission directly to you as the online platform appears to fail.

Please find attached two submissions.

Regards

Martin Snelson  
0274375055  
Sent from [Mail](#) for Windows

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\* Cynthia Snelson  
 Address\* 9 Euphrasie Dr, Aidanfield Christchurch Postcode\* 8025  
 Email snelsonchche@gmail.com Phone no. 0272083096

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 Cynthia Snelson

Date 03-05-2023

Have your say

## Housing and Business Choice Plan Change 14

---

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

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

Residential 14, Housing + Business Choice Plan Change 14

My submission is that:\*

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

See Additional sheet

I seek the following decision from the Council:\*

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

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

See additional sheet.

Chelms

st

Have your say Housing and Business Choice Plan Change 14

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

Zoning of parts of North Halswell (Aidanfield) as a High-Density Residential Zone

Updated recession planes /set back from boundary

**My submission is that:**

We oppose, in part, the Housing and Business Choice Plan Change 14 and wish to have them amended due to the affects it has on:

- significantly reduced sunlight hours to our single story's lower floor, especially in winter. We chose our property because of the low heights of housing in the area for our retirement home, with sunlight providing a good quality of life and a healthy, mould free environment. These requirements are essential when aging and with health requirements (lung issues) and mental wellbeing. Lack of sun contributes to producing damaging mould and mildew, adding to health issues.
- adding additional heating costs and added financial burden, particularly as pensioners.
- not being in keeping with the neighbourhood building a 3 or 4 story building. Additional dwellings could pose further noise to what is an extremely quiet neighbourhood.
- There is an empty section behind us on the North East side which means the new rules proposed under Plan Change 14 High Density Zone would significantly impact our sunlight providing no sun through winter in many rooms of our house. Our health and wellbeing would be highly impacted with this change.

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

Amend the HDRZ and MDRZ in the proposed Northern Halswell town centre, to refer to the areas being developed, and not to those newly built areas.

Amend the recession plane angles and setbacks to maximise sunlight to existing single story buildings in existing subdivisions

Amend by removing the requirement for minimum two storey housing.

To amend the proposed changes to include an increased set back of the new building and altering recession planes to ensure maximum/more sunlight hours to neighbouring properties in established new suburbs.

To plan to maintain the quality of the quiet, sunny, healthy environment in keeping with the single and occasional two-story neighbourhood that the Aidanfield subdivision was designed for and use new subdivision developments to obtain higher density living.

**ME & C Snelson**

**9 Euphrasie Drive**

**Christchurch 8025**

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

## Submitter Details

**Submission Date:** 04/05/2023

**First name:** Claire **Last name:** Mulcock

**Preferred method of contact** Email

**Postal address:** PO Box 9320, Tower

Junction

**Suburb:**

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8149

**Email:** DeansAvePrecinctSoc@gmail.com

**Daytime Phone:** 0274415605

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 22.1

- Support
- Oppose

Seek Amendment

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

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

**My submission is that**

Please see the detailed submission in the attachment.

We support the broad goals of the urban intensification process, and do not think that Christchurch should be allowed to sprawl further across the plans. We need to take account of national priorities, not only with respect to land use, but with respect to energy efficiency and de-carbonization.

Some parts of the area should not change to HRZ. Therefore, I oppose some proposed plan under chapter 14.

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Attached Documents

File
DAPS PC 14 submission attachment May 2023
DAPS PC 14 submission email May 2023

# Submission on Notified Plan Change to Christchurch District Plan (Housing and Business Choice Plan Change 14)

Clause 6 of Schedule 1 Resource Management Act 1991

## Submitter Details

Deans Avenue Precinct Society Inc.  
PO Box 9320  
Tower Junction  
Christchurch 8149

Contact person: Claire Mulcock (Secretary)  
Tel: 027 4415 605  
DeansAvePrecinctSoc@gmail.com

Deans Avenue Precinct Society Inc. could not gain an advantage in trade competition through this submission.

We wish to speak in support of our submission on Plan Change 14.

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

## 1 Introduction

- 1.1 Deans Avenue Precinct Society Inc. (DAPS) is a neighbourhood association for the area bounded on the west by the railway line; the east by Deans Avenue/Hagley Park; and to the north and south by Matai Street East and Moorhouse Avenue. There are over 700 households.
- 1.2 Our area has been zoned for Medium Density Residential development for many years. Over the last 20 years many of the old houses have been replaced by multi-unit blocks (mainly 1-2 stories, but some 3), although a mix of other dwelling types remains. Our neighbourhood events are well-attended and show that we have a vibrant and diverse community who enjoy the opportunities of living close to the city.
- 1.3 We have a high proportion of rental properties, mainly small units with limited outdoor areas. While we are close to Hagley Park and the city, our nearest primary schools are Wharenui and Ilam. Neither are easy walking access and this contributes to the small proportion of families with younger children. Walking or cycling to these schools requires crossing major roads.
- 1.4 Because the area does not currently attract many families, households often have 4 or more adults which, along with demand from hospital staff etc, exacerbates the demand for off-site car parks and contributes to congestion in Deans Avenue.



- 1.5 Under the intensification rules, all of our area is proposed to be within the High Density Residential Zone (HRZ) with a mix of Town Centre Intensification Precinct and High Density Residential Precinct.

## 2 General Comments

- 2.1 We support the broad goals of the urban intensification process, and do not think that Christchurch should be allowed to sprawl further across the plains. We need to take account of national priorities, not only with respect to land use, but with respect to energy efficiency and de-carbonisation.
- 2.2 We recognise that this location is generally suitable for higher density development, as it is close to the city and to public transport, with Hagley Park providing open public outdoor space.
- 2.3 Parts of the DAPS area would be appropriate for high density housing. This should be in limited areas to start with and better planned to minimise adverse social and environmental effects. Because many of the old houses have already been replaced by multi unit blocks in the last 20 years there are limited sites that would accommodate buildings of 4+ storeys without adversely affecting neighbours (e.g. loss of sun and privacy, exacerbation of street parking problems). Development of higher residential buildings will further reduce the proportion of housing types that will encourage more families and owner-occupiers.
- 2.4 The railway line forms a significant barrier for our area. In Deans Avenue South the only vehicle access points across the railway are Moorhouse Avenue or Riccarton Road. The cycleway to Lowe Street gives an additional crossing for pedestrians and cyclists. When traffic builds up on Deans Avenue (major arterial), which happens frequently, for many reasons, residents in or off Deans Avenue South have no alternative access or exit to or from their properties. Increased density of housing will only exacerbate this.
- 2.5 The railway line also means that the effective distance to many amenities is actually much greater than it may appear on a map. From a typical point, say midway on Brockworth place, the closest supermarket (Pak'n'Save Riccarton) is 20 minutes walk and the closest primary school (Wharenui) is around 30 minutes walk (for an adult). (See diagrams in Appendix 1)

## 3 Oppose: Some parts of the area should not change to HRZ

- 3.1 We oppose the DAPS area becoming HRZ residential at this time, except for the areas noted in section 4. We consider that we do not meet the criteria in 14.2.7 Objective – High Density Residential Zone, to enable HRZ commensurate with demand, community facilities etc and 14.2.7.2 Policy (high density location to enable HRZ within walking catchment of city centre, town centre (Riccarton)).

### Reasons

- 3.2 The focus for HRZ development in Christchurch must be on the central city for the next 5-10 years. Without a significant residential population in the central area, Christchurch will be a less vibrant, lively and attractive place bringing in tourists and those from the wider Christchurch and Canterbury areas. We need to fully capture the post-earthquake opportunity to make the central city a great place to live, especially for young people.

- 3.3 Encouraging high density immediately adjacent to the centre in areas such as ours has the potential to reduce much needed residential development in the CBD. This gives the opportunity to do more work to ensure that new 4-6 storey blocks randomly placed in an area that is already densely developed with 1-2 storey units do not unreasonably affect the existing community including:
- Encouraging more people to live in Deans Avenue and adjacent side streets is counter to Policy 14.2.4.1 (Avoidance of adverse effects on strategic infrastructure (iii) ... major arterial network). Deans Avenue is already congested and the railway line means that, south of Bartlett Street, all existing and new residents must use Deans Avenue to enter/exit from their properties.
  - Policy 14.2.5.2(v) (High Quality Medium Density residential development) includes promoting low impact urban design, including energy efficiency. The high quality urban design elements promoted in this policy (14.2.5.2) are appropriate for our area, but there is no similar policy for HRZ, including ensuring viability of solar energy or consideration of on-site parking (for electric vehicle charging and to address the shortage of street parking).
  - Some small public open spaces (pocket parks) must be provided within the HRZ where trees could be planted using financial contributions from developers who take down existing trees. Even though Hagley Park is adjacent to the area it does not provide for all neighbourhood needs. For example, much of Brockworth place is devoid of any green space at all.
- 3.4 DAPS is largely outside the “walking catchment” of either Riccarton or CBD as defined by CCC (1.2 km from CBD or 600m from Riccarton town centre zone). Maps (Appendix 1) show that walkability / accessibility criteria are not met and the area is not closely connected to Riccarton, in part because of the barrier of the railway line and because many of the key amenities and service (supermarket, Wharenui primary school) are at the western end. Amenities within the City (library, swimming pool (under construction), supermarket) are perhaps better located, but also outside the designated walkability catchment.
- 3.5 There are significant negative effects from allowing unplanned/random 4 storey and higher buildings amongst existing medium density housing (1-3 stories). In particular, increased shading could be expected to:
- reduce the viability of roof top solar installations (counter to achieving Government’s energy goals), because they will not receive sufficient sun, especially in winter.
  - compromise residents “enjoyment” of their properties due to less sunshine, especially in winter (even with the proposed revised recession plane).
- 3.6 Suddenly opening up a wide area for potentially immediate unplanned development makes infrastructure and transport planning much more difficult, and spreads the threat of shading, and hence the inhibition of solar development, over a much wider area, at a much earlier date, than a more focussed plan for progressive intensification. The same may be said about progressive development of coherent communities.

- 3.7 Urban form should support a diverse and connected neighbourhood where people want to live, not just pass through. Long term residents at various life stages are vital to maintaining a community spirit and taking responsibility for encouraging a friendly, caring and safe environment. Our community has many rental properties and many short term residents, but it is mostly the long term residents whose efforts help create a more resilient, connected and self-reliant community. If the area has an unattractive built environment it is unlikely to retain long term residents with a consequent reduction in social resilience.
- 3.8 The Christchurch Mosque attacks in 2019 impacted local residents around the Al Noor mosque, as well as the Mosque community. The potential for higher buildings adjacent to the Mosque raises safety concerns for those who attend the mosque, and the local neighbourhood.

## **4 Support: Some parts of the area should be HRZ**

- 4.1 We support these areas being HRZ:
- the “Old Saleyards” block from south side of Mayfair to Lester
  - The Residential Guest Accommodation block (Chateau on the Park etc)
  - Properties with a boundary on Riccarton Road

### **Reasons**

- 4.2 The block from south side of Mayfair to Lester Lane (“Old saleyards”; 25 Deans Avenue) is a large clear site that could be developed with taller buildings and higher density and provide on-site amenity, using high quality urban design. In the operative District Plan it has a ‘higher height overlay’ already allowing development to 20m.
- 4.3 The block bounded by Deans Ave/Kilmarnock St/Darvel St/ which is zoned Residential Guest Accommodation could have the same height rules as HRZ, with the Town Centre Intensification Precinct rules) (4 storeys without resource consent, when meeting associated controls, and up to 6 storeys via resource consent.). Parts of this block are already consented for higher buildings.
- 4.4 Properties with a boundary on Riccarton Road will become part of the City Spine Transport Corridor 14.6.2.17 (Riccarton Road – 4m setback proposed). In the DAPS area (Deans Ave to the railway line), these were previously zoned for visitor accommodation and related businesses. They could reasonably accommodate higher buildings, although parking would be an issue.

## **5 Support: Addition of revised recession planes as Qualifying Matter(QM) for MD and HRZ**

- 5.1 We support the proposal to add a Qualifying Matter that would better allow sunshine to reach neighbouring properties, especially in the winter. This must apply to both MD and HRZ.

### **Reasons**

- 5.2 The recession plan rules provided by central government do not take account of the lower latitude and winter sun angles in Christchurch compared with other Tier 1 centres, and would not only diminish enjoyment, but also inhibit rooftop solar developments, contrary to national sustainability goals.

## **6 Oppose: Any further reduction in sunlight or privacy than proposed in the QM**

- 6.1 We oppose any reduction of sunlight because the recession plane rules, as proposed, allow less sunlight than the existing rules, and should therefore, not be further reduced.

### **Reasons**

- 6.2 The QM rules better recognise the winter sun situation in Christchurch than the Government prescribed recession plane rules.
- 6.3 At the original subdivision in the 1920s sections in our area were not 'quarter-acre' (1,000 m<sup>2</sup>), but were typically 500-750 m<sup>2</sup> and long and narrow (e.g. 20 x 35 m). Many are now redeveloped from a single house to 4-6 small units in a row, usually 2 storey, in the narrow section.
- 6.4 The current District Plan rules for medium density zoning already cause loss of sunlight to neighbouring dwellings when one house in the centre of a section is replaced with a block of 2-3 storey units with minimum outdoor areas. This will be exacerbated with taller 4-6 storey buildings and reduced minimum setbacks amongst the existing housing.
- 6.5 Privacy is already often compromised with blocks of 2 storey units on the typically small, narrow sections range) looking into adjacent windows or outdoor areas.

## **7 Oppose: No public or limited notification for applications where recession planes or setbacks are outside the rules**

- 7.1 Adjacent landowners should be consulted for all applications where setbacks or recession planes do not meet the rules. (HRZ: RD 9 recession plane; RD 10 setbacks; 14.15.4; 14.15.3a)

### **Reasons**

- 7.2 If the rules are not met, adjacent landowners are likely to be more adversely affected, and therefore should be entitled to have an input into the decision-making process.

## 8 Support: “Saleyards site” (25 Deans Ave) to be Residential not Mixed Use

- 8.1 This area is categorised in the operative District Plan as ‘Brownfields’ and able to be developed for mixed commercial and residential use (14.5.1.4 D6). We support it now being zoned as HRZ (as proposed).

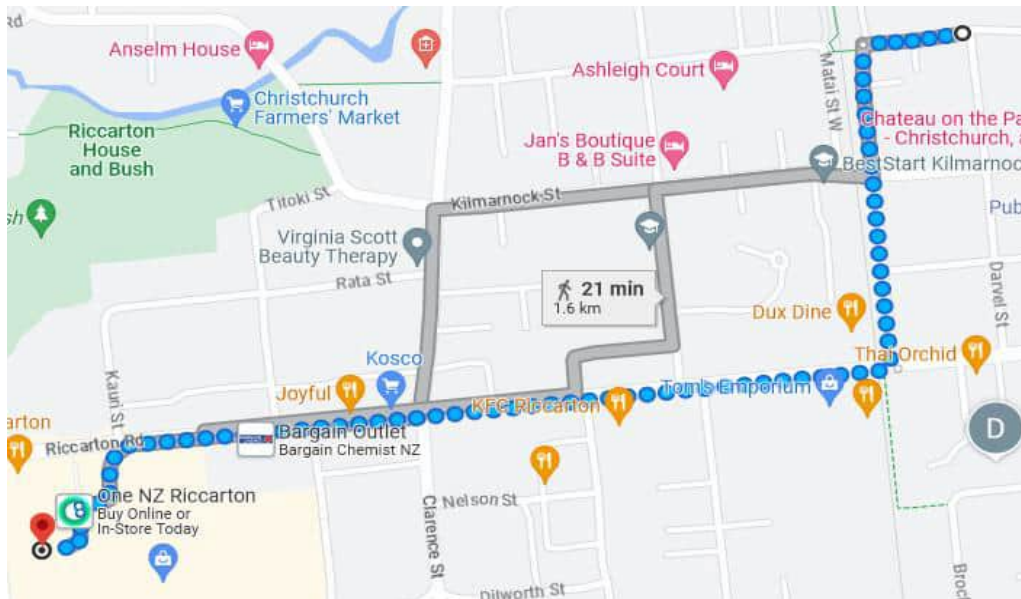
### Reasons

- 8.2 The change from Residential to ‘Mixed use’ is relatively recent (post earthquakes?).
- 8.3 There are relatively few blocks of land this size available in this area close to the city for residential development, but relatively more commercial land around the Addington/Riccarton east area.
- 8.4 The site is suited to high density development of a high quality including good on-site amenities and services.
- 8.5 The site already has a ‘higher height overlay’ and can be developed to 6 storeys.

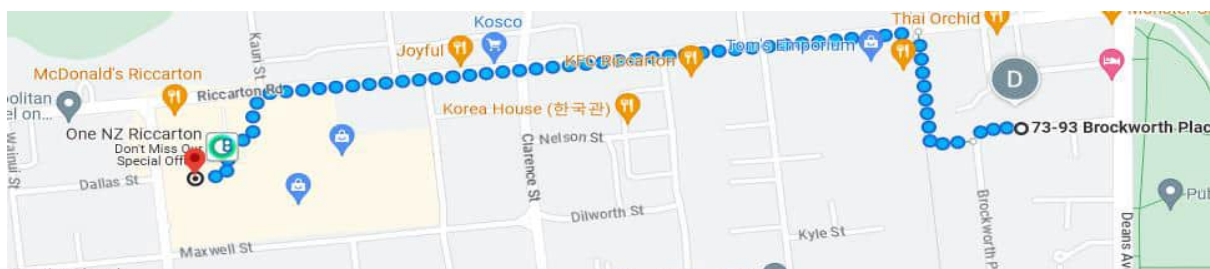
## 9 Conclusions

- 9.1 The focus for HRZ development in Christchurch must continue to be on the central city for the next 5-10 years.
- 9.2 We support HRZ for the ‘Old Saleyards’ area. This could be at least to 20m (6 storeys) as presently allowed under ‘higher height overlay’. We oppose mixed commercial and residential use for this site.
- 9.3 We support the height rules for HRZ with the ‘Town Centre Precinct’ for the ‘Guest Accommodation’ block (Deans/Kilmarnock/Darvel/Matai East).
- 9.4 We support the proposed Qualifying Matter for Christchurch-specific recession plane rules.
- 9.5 We oppose any changes to the proposed recession plane rules that further reduce sunlight on neighbouring properties.
- 9.6 We oppose ‘no public or limited notification’ for applications that don’t meet recession plane rules. Adjacent landowners who are potentially adversely affected should have an input to the decision-making.
- 9.7 We oppose the rest of the area changing from medium density to HRZ, until there is a more planned approach to 4-6 storey development amongst existing housing, much of it less than 20 years old. Provision must be made for green space and trees (not just financial contributions or more trees in Hagley Park) and implications for the major arterial (Deans Avenue) need to be determined. Otherwise there is a risk that the area could become a ‘dormitory’ area of small apartments, with a largely transient population.

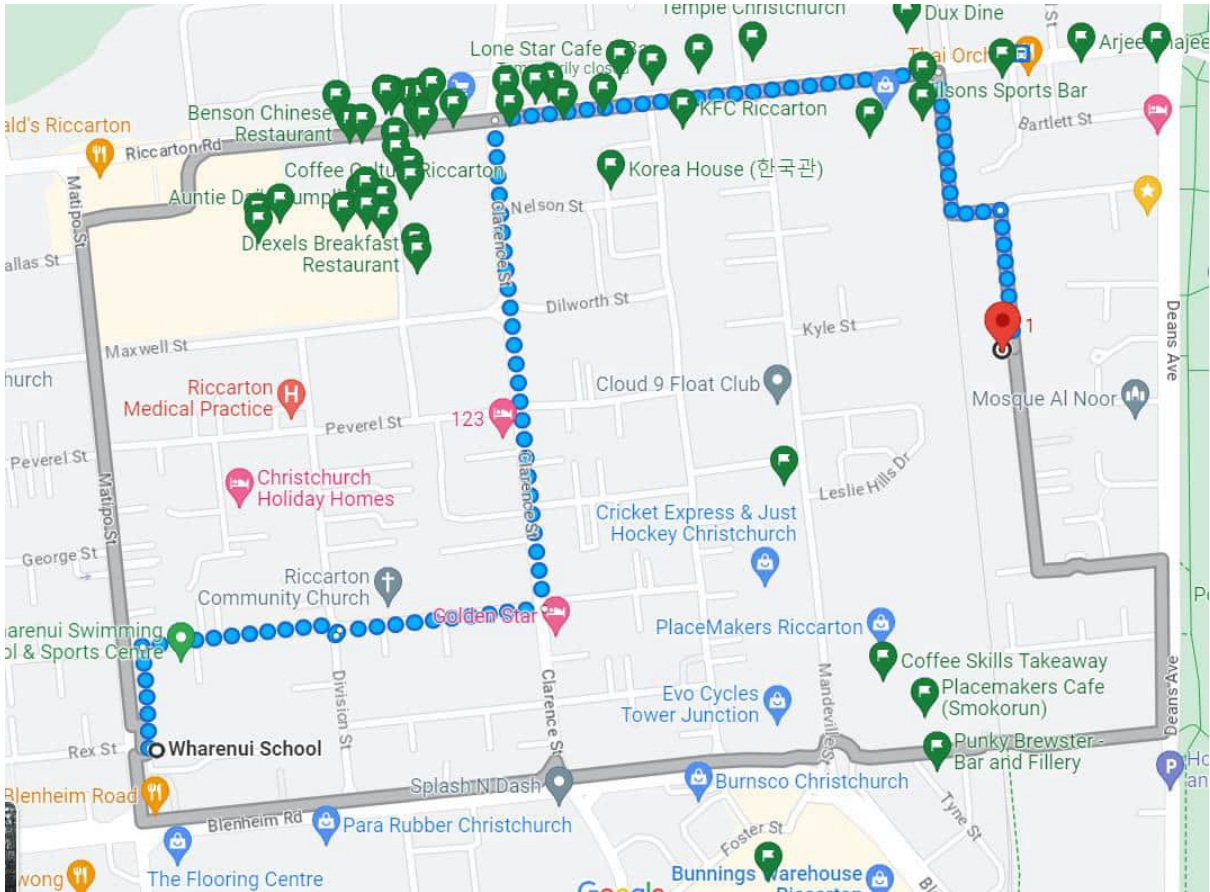
## Appendix 1 Walking distances to PaknSave Riccarton, Wharenui School and New World Durham St



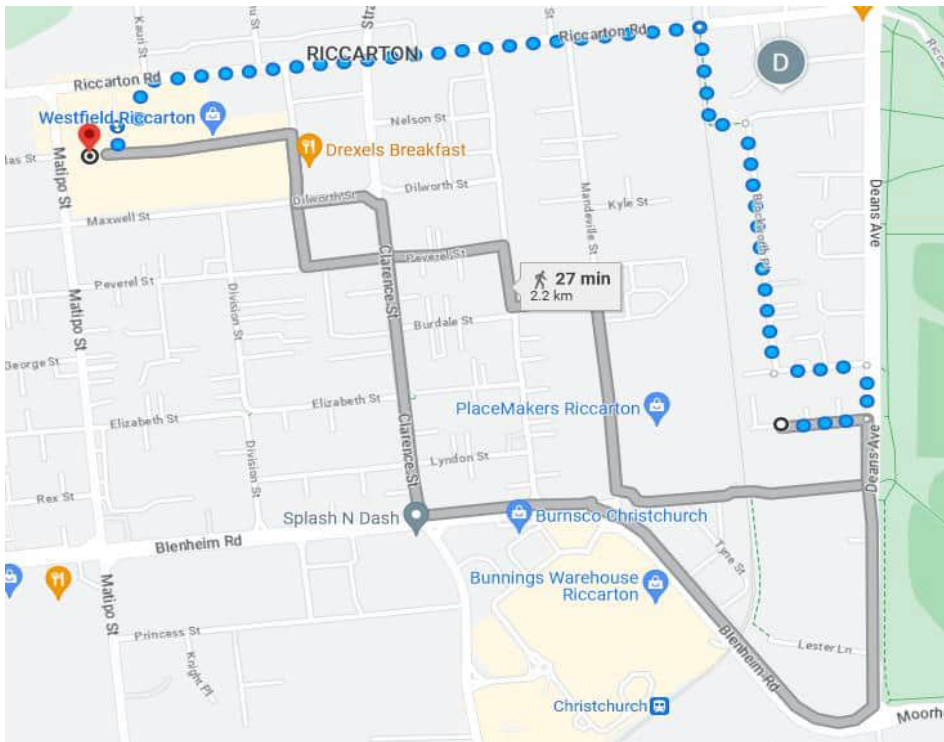
Matai St East to PaknSave 1600m 20 minutes (Google maps)



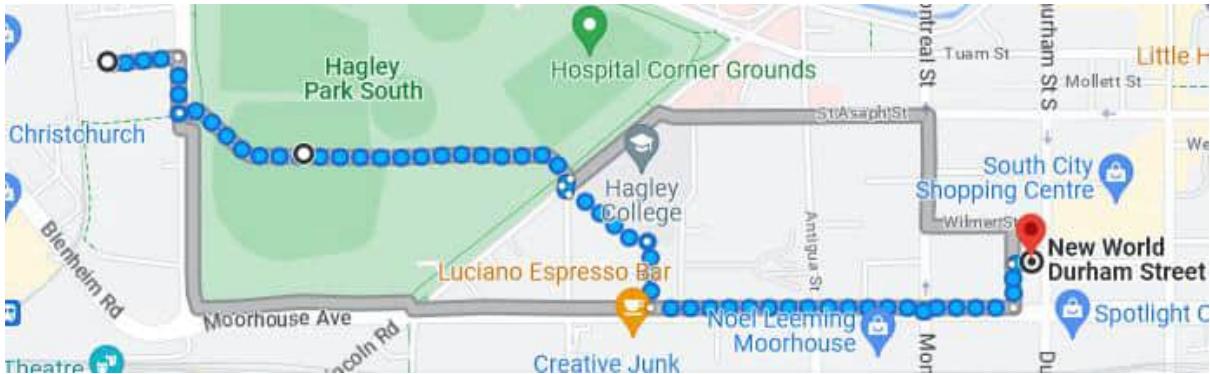
80 Brockworth to PaknSave 1400m 17 minutes (Google maps)



53 Brockworth to Wharenui school, 28 minutes (Google maps)



Mayfair St to PaknSave Riccarton 2200m 27 minutes (Google maps)



Mayfair St to New World Durham St 2400m 29 minutes (Google maps)



**Cui, Aviva**

---

**From:** Deans Ave Precinct Soc <deansaveprecinctsoc@gmail.com>  
**Sent:** Wednesday, 3 May 2023 1:10 pm  
**To:** Engagement  
**Subject:** PC 14 Submission  
**Attachments:** DAPS PC 14 submission May 2023.pdf

Please find attached a submission from Deans Avenue Precinct Society Inc.

**Submitter Details (these are included in attached submission)**

Deans Avenue Precinct Society Inc.  
PO Box 9320  
Tower Junction  
Christchurch 8149

Contact person: Claire Mulcock (Secretary)

Tel: 027 4415 605

[DeansAvePrecinctSoc@gmail.com](mailto:DeansAvePrecinctSoc@gmail.com)

Deans Avenue Precinct Society Inc. could not gain an advantage in trade competition through this submission.

We wish to speak in support of our submission on Plan Change 14.

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

Claire Mulcock  
Secretary  
Deans Avenue Precinct Society Inc.

tel: 027 4415 605

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

## Submitter Details

**Submission Date:** 04/05/2023

**First name:** David **Last name:** Lough

**Preferred method of contact** Email

**Postal address:** 115 Rugby Street

**Suburb:** Merivale

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8014

**Email:** dloughjc@hotmail.com

**Daytime Phone:** 021999935

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

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

Note to person making submission:

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

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 23.1

- 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**

We have lived at 115 Rugby Street, Merivale since 1986. During this time We have observed the quality of the housing stock has improved substantially over 45 years.

I am a Neighbourhood support co-ordinator, so have an appreciation of peoples thoughts.

Residents tend to be older, requiring access to hospitals and shopping facilities closeby. Mobility and disability constraints necessitate single storey accomodation. Residents cite security as a reason to live in the area. The existing plan has been kind to these demographics and tends to meets their needs.

The quality of housing stock is high and should not be seen as 'easy meat' for a developer,. Most houses have at least 50 good years ahead of them. What a waste to see these buildings destroyed at a time when the Council has declared a climate emergency.

We live in an earthquake prone zone and therefore believe it is naive to think the city is spared further destruction from tectonic movements.

Finally, I support intensification inside the CBD and the west of Hagley Park.

---

#### Attached Documents

File
No records to display.

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

## Submitter Details

**Submission Date:** 04/05/2023

**First name:** Richard **Last name:** Ball

**Preferred method of contact** Email

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** kiwi.rickb@gmail.com

**Daytime Phone:** 0272083532

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:

There are 30 individuals associated with this submission, some of whom may also wish to speak at the hearing.

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 24.1

- Support
- Oppose
- Seek Amendment

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

***If seeking to make changes to a specific site or sites, please provide the address or identify the area refer to attached document.***

**My submission is that**

1. That the permitted height limits within the existing District Plan (prior to PC14) are retained to the maximum extent possible.
2. Where Government legislation and regulations require increases to height limits, that these are kept to the minimum extent possible for compliance with the regulations.
3. The need for greater intensification is supported but this does not require or justify the proposed increases in height limits as permitted activities.
4. The inclusion of the qualifying criteria is supported, independent of height limits, as a means of promoting good design and ensuring new buildings do not adversely impact existing buildings designed and constructed within the current District Plan requirements.

Our submission covers multiple parts of the plan. Refer to attached document for further explanation.

---

Attached Documents

File
Submission on PC14

# Submission on Christchurch City Council Plan Change 14

## Who we are:

This submission is made on behalf of the following persons, all of whom own units in the Atlas Quarter, 36 Welles Street, Christchurch Central:

Richard Ball, Athena Ellis, Phil and Lynette Stenning, Max Lucas, Paul and Jeni Neilson, Jenny Jia and Zhongyang Yuan, Piers and Emma Bayley, Rachel and Tim Scanlan, Eileen and Vernon Payne, Bruce Fraser, Eléonore Dumaine, Peter and Faye Greenwood, Alan Steel, Gillian Smeith, Chelsea Kennedy, Deborah Bowker, Kate and Mike Peers, Peter Morris, Mathilde Vachon, Barbra Pullar, Martin Rumbold and Kirsty Stewart.

## Key points:

We support well designed intensive residential and commercial development, integrated with sustainable transport options. We have already “put our money where our mouths are” by purchasing units in the Atlas Quarter, a large and successful inner-city development of 110 residential and three commercial units.

We oppose the greatly increased height limits proposed by Plan Change 14. They are unnecessary and inappropriate for Christchurch.

We support the inclusion of qualifying matters to enhance design quality and urban amenity across the City.

## Relief sought:

1. That the permitted height limits within the existing District Plan (prior to PC14) are retained to the maximum extent possible.
2. Where Government legislation and regulations require increases to height limits, that these are kept to the minimum extent possible for compliance with the regulations.
3. The need for greater intensification is supported but this does not require or justify the proposed increases in height limits as permitted activities.
4. The inclusion of the qualifying criteria is supported, independent of height limits, as a means of promoting good design and ensuring new buildings do not adversely impact existing buildings designed and constructed within the current District Plan requirements.

## Reasons:

Following the Christchurch earthquakes, a comprehensive design process was undertaken for the City, particularly for the central city. Deliberate and well-informed decisions were made create a liveable city, with intensified development in the central city and around suburban centres, but with lower central city height limits than previously existed. This has created a compact central city with increased densities compared to before the earthquakes, but without the height of some of the

buildings that Christchurch had pre-earthquake . The consolidation has resulted in many vacant sites becoming available which are gradually being filled.

This model was developed by looking at best practice around the world, combined with local input from residents and experts, to create an attractive and vibrant City. It set ambitious goals for increasing densities for residential living, especially in the central city and around suburban centres. It was fully integrated with future transport options and climate resilience objectives.

It has widespread local support and was developed with considerable input and investment from Government (via CERA) and Christchurch City Council. It integrated land use and transport, seeking higher densities and more sustainable transport, as reflected in the Land Use Recovery Plan, Christchurch Central Recovery Plan and the Central City Transport Plan. It was embedded into the District Plan through an Independent Hearing Panel of experts hand-picked by the Government.

The greatly increased height limits proposed Plan Change 14 undermines the objectives and principles that underpin the vision of the 2015 Christchurch Central Recovery Plan:

*“To become one of the best small cities in the world, Christchurch needs a city centre that is:*

- *an inspiring place to live*
- *an attractive place to invest*
- *the best urban environment in New Zealand.”*

The decision to limit heights was a deliberate choice in achieving this vision. The proposed changes will undermine existing investments, entered into in good faith based on the Recovery Plans, while also reducing the central city’s design coherence and creating a less attractive City.

The many empty sites and carparks that still exist post-earthquake provide adequate future capacity for the foreseeable future, including the “competitive margin” required by Government regulations. The only apparent reason for increasing the height limits appears to be compliance with new Government regulations. If the height limits are to be increased, this change should be done to the minimum extent needed to comply with these ill-considered Government requirements. There is no other justification for the proposed rules.

The proposed rules allow new development to be concentrated in a small number of very tall buildings, with the negative impacts such as greater shading and wind tunnels, accompanied by a continuation of many empty and ugly lots in the central city. As the vacant sites are largely filled with cheap carparking, this further undermines the stated transport sustainability and climate resilience objectives.

The scale of the buildings permitted under PC14 is not consistent with the extensive post-earthquake developments that have already occurred. The post-quake developments have created a very attractive City which will be undermined by these proposals. Existing intensive residential developments, such as the Atlas Quarter, could be overshadowed by new buildings of nearly twice the height on the east and west, blocking sunlight. Others may be blocked to the north.

In short, the proposal for increased heights across the City are ill-considered solutions for problems that exist in Auckland, Wellington, and possibly other centres, but are not applicable to Christchurch. The geography and existing development of these other centres constrains new development. Post-earthquake Christchurch is quite different from these other centres: it is not constrained for growth opportunities, as demonstrated by the far slower growth in property prices over recent years. Even before the earthquakes, Christchurch had far more stable (less volatile) prices than Auckland and

Wellington – a trend that has persisted since at least the 1970's. In Christchurch there is housing choice, particularly with substantial increases in the number of higher density residential apartments.

Maximising the benefits of intensification needs to consider the dis-benefits. The proposed Plan identifies loss of tree cover as a disbenefit but does appear to put sufficient emphasis on other matters. Why does it propose financial contributions for loss of tree cover but not for loss of sunlight to others, wind tunnel effects or loss of amenity? In the Christchurch context, the widespread demolition of much of the central city, including most of the taller buildings, and consolidation of activities into more compact precincts, has created a much more attractive City with a visual appearance and aesthetic appropriate for the size of the City, reflected in the Central City Recovery Plan issued by CERA after extensive public and expert engagement. Both residents and visitors are commenting on the attractiveness of this new look. Re-introducing unnecessarily large buildings undermines this new and attractive look. Even with setbacks and other requirements, it has the potential to detract from the amenity and value of the very substantial public and private investment made for the City's re-build and recovery.



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

## Submitter Details

**Submission Date:** 04/05/2023

**First name:** Michael **Last name:** Dore

**Preferred method of contact** Email

**Postal address:** 36 Rata Street

**Suburb:** Riccarton

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8041

**Email:** mdore@xtra.co.nz

**Daytime Phone:** 021677591

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

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

Note to person making submission:

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

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 25.1

- Support
- Oppose
- Seek Amendment

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

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

**My submission is that**

Areas for development above 12 meters should not be intermingled in existing residential areas. They should be restricted to the inner city area or in blocks together where there is much unused land and where that development was originally planned following the Christchurch earthquakes. Tall buildings inter laced with traditional residential housing will always create disharmony distrust and break

up communities who have often lived on one site for many years.anded approach is like hitting a tack with a sledgehammer.

Riccarton House and Bush is the oldest area of Christchurch and interlaced with so much of the city's history. The Bush area is already designated a heritage site. To provide further protection to this historical asset a buffer zone of surrounding streets should qualify as low density with height restrictions in current and future planning and resource consents should remain mandatory. It is vital and very necessary to respect and acknowledge the area as important to the heritage of Christchurch.

The History, Character and Heritage of our City of Christchurch should be protected at all costs. If we allow the government to adopt their one size fits all greater intensification strategy we will have let down our future generations. It seems the easiest option to adopt and most importantly fails to consider and respect the lives and the health of the people and the investment they have made who already live in the areas most affected. The heavy-handed approach is like hitting a tack with a sledgehammer.

One size does not fit all. How can you compare Auckland or Wellington with Christchurch when the topography is so different. Allowing new buildings of the proposed heights will create shaded areas for existing houses which will affect people's mental health and wellbeing.

I strongly object to the intensification of residential land. The Governments heavy handed approach is already creating disharmony which will only get worse. One size does not fit all. How can you compare Auckland or Wellington with Christchurch when the topography is so different. Allowing new buildings of the proposed heights will create shaded areas for existing houses which will affect people's mental health and wellbeing. It should not be too difficult to find sufficient pockets of land including in the central City itself to allow greater intensification to satisfy additional demands for housing and protect existing communities.

---

#### Attached Documents

File
No records to display.

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

## Submitter Details

**Submission Date:** 04/05/2023

**First name:** Graeme **Last name:** McNicholl

**Preferred method of contact** Postal

**Postal address:** 118 William Brittan Avenue

**Suburb:** Halswell

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8025

**Daytime Phone:** 0274716164

I could not

Gain an advantage in trade competition through this submission

I am not

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

a. adversely affects the environment, and

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

Note to person making submission:

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

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 26.1

Support

Oppose

Seek Amendment

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

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

As an alternative to intensifying the housing in the city, Council's should be looking at current inner-city large blocks of land, such as Princess Margaret Hospital site on Cashmere Road, the old Christchurch Women's Hospital site on Colombo Street, current empty tracks of land such as along Moorhouse Avenue, and rezone these areas for mixed use retail with apartment living above.

Furthermore there are potentially other older commercial/industrial areas of Christchurch such as Addington, Sydenham and Phillipstown that should be rezoned as mixed use commercial with apartment living above. This would allow for this old industrial area of town to be upgraded and change to allow high rise apartment living in an organic way over time. This helps to keep the city compact by not driving some home owners to the outer-lying districts and keeps people closer to the city centre, utilising the new amenities such as the Metro Sports Centre, theatres, restaurants, bars and retail that are still under development. We need to give the city a chance to realise the vision that was set in the blue-print for the city following the earthquakes.

Furthermore, the future large green field developments should cater for the medium-density housing as proposed, in order to safe-guard prospective house owners with an understanding of what they are buying.

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

Christchurch city, following the earthquakes, has recently had major residential plan changes under the earthquake legislation which has already allowed a lot of residential medium density housing to take place in Christchurch's older suburbs. The city should now be given a chance to bed-in these current changes and allow the city's new character to organically settle in place. Having a further upgrade imposed on the city will drastically alter it's current organic growth and therefore lose the city's character and charm. It is totally unfair that the government has forced the Christchurch City Council to make further changes so soon after major changes following the earthquake.

While I support high-density housing as is currently designated throughout the city, I disagree with intensifying this further throughout the rest of the city. I believe that allowing a medium density environment throughout much of the city and imposing three and four story buildings, will have a negative impact on the value of surrounding properties, and will potentially alter the rate-payer base of the city, by way of driving some families to the outer lying districts to avoid this imposition. This will create gaps in society where particular home owners will feel not considered or catered for in this proposed housing environment.

---

#### Attached Documents

File
No records to display.

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

## Submitter Details

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

**First name:** Alex **Last name:** Prince

**Preferred method of contact** Email

**Postal address:** 46 Fairview Street

**Suburb:** Somerfield

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8024

**Email:** abuchan100@hotmail.com

**Daytime Phone:** +64212426348

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

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

Note to person making submission:

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 27.1

- 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***

Lower Cashmere (Fairview Street/Cashmere View/Ashgrove Terrace)

### My submission is that

I would like to see the Lower Cashmere (Fairview Street/Cashmere View/Ashgrove Terrace) area included as part of the suburban character area. It would be absolutely devastating to the area to lose trees, sunlight, increase cars parked on the road through lack of off street parking. This area is a treasure of Christchurch with its pleasant walks, tree lined streets, river walks and peace and

tranquility. To lose this with increased housing development and 3 storey townhouses would a massive loss for the city. The surrounding schools are also currently at capacity so resources would not be able to cope.

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#### Attached Documents

File
No records to display.

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

## Submitter Details

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

**First name:** Martin **Last name:** Winder

**Preferred method of contact:** Postal

**Postal address:** 3 Tiroroa Lane

**Suburb:** Huntsbury

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8022

**Daytime Phone:** 0275455424

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

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

- a. adversely affects the environment, and
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Note to person making submission:

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

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

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 28.1

- Support
- Oppose
- Seek Amendment

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

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

Retain the Character Area on Hackthorne Road but exclude my vacant property at 75a Hackthorne Road. It was formerly my family home but the earthquakes damaged our home to the degree that an expensive repair was not viable. Our former dwelling had no character value (1958 brick dwelling). The proposed plan identifies my property with a 'Residential Character Area' Qualifying Matter. My neighbours at 75 Hackthorne Road are not. I'm concerned that the Qualifying Matter will only reduce my ability to develop the property into 3 units. My site is one of the few vacant sites which could provide an increase in density to the area. A bus stop is located right outside so public transport access couldn't be better. My site has no inherent 'character' at the moment and potentially limiting its development potential appears at odds with the intent of the Plan Change and Government directive on housing density. The Residential Character Areas are site specific on Hackthorne Road and only incorporate front sites. Rear sites are excluded.

Therefore excluding an additional site from the Character Area is not onerous or precedent setting.

**My submission is that**

My property at 75a Hackthorne Road is a vacant section. It was formerly my family home but the earthquakes damaged our home to the degree that an expensive repair was not viable. Our former dwelling had no character value (1958 brick dwelling). The proposed plan identifies my property with a 'Residential Character Area' Qualifying Matter. My neighbours at 75 Hackthorne Road are not. I'm concerned that the Qualifying Matter will only reduce my ability to develop the property into 3 units. My site is one of the few vacant sites which could provide an increase in density to the area. A bus stop is located right outside so public transport access couldn't be better. My site has no inherent 'character' at the moment and potentially limiting its development potential appears at odds with the intent of the Plan Change and Government directive on housing density. The Residential Character Areas are site specific on Hackthorne Road and only incorporate front sites. Rear sites are excluded. Therefore excluding an additional site from the Character Area is not onerous or precedent setting.

## Attached Documents

File
75a Hackthorne Rd Sub







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

## Submitter Details

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

**First name:** Jennifer **Last name:** Smith

**Preferred method of contact** Email

**Postal address:** 51 Jollie Street

**Suburb:** Linwood

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8062

**Email:** jennyandshane@gmail.com

**Daytime Phone:** 0211371702

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

I am not  
directly affected by an effect of the subject matter of the submission that :  
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Note to person making submission:

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 29.1

- Support
- Oppose
- Seek Amendment

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

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

**My submission is that**

I oppose the change to my property being rezoned to High Density Residential due to the affect this would have on sunlight to my home. Due to Christchurch's latitude there is a real risk that allowing properties up to 14 metres high without the need for resource consent that sunlight will be blocked. I believe that any new builds over 2 stories in height should go through resource consent.

## Attached Documents

File
No records to display.

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

## Submitter Details

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

**First name:** Andrew **Last name:** Ott

**Preferred method of contact** Email

**Postal address:** 48 Wairarapa Terrace

**Suburb:** Merivale

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8014

**Email:** romanott@xtra.co.nz

**Daytime Phone:** 0274555180

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

I am not  
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Note to person making submission:

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 30.1

- Support
- Oppose
- Seek Amendment

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

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

**My submission is that**

Allowing three (3) story buildings anywhere does not make sense.

There is a huge number of single story housing in Chch - that very significant housing intensification would be

achievable with allowing two (2) story housing (as opposed to three)

---

Attached Documents

File
No records to display.

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

## Submitter Details

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

**First name:** Phil **Last name:** Elmey

**Preferred method of contact** Email

**Postal address:** 39 Rossmore Terrace

**Suburb:** Cashmere

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8022

**Email:** elmeyphil@gmail.com

**Daytime Phone:** 0211246065

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

I am not  
directly affected by an effect of the subject matter of the submission that :  
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**Would you like to present your submission in person at a hearing?**

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 31.1

- Support
- Oppose
- Seek Amendment

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

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

Specifically requested is the adoption of the MBIE/NZGS/NZTA Guidance Document for design of passive Rockfall structures as an acceptable method of reducing rockfall hazard on a site specific basis.

**My submission is that**

I believe the inability to take into account rockfall mitigation in RHMA1 and 2 and the use of GNS Life risk (AIFR)

models in determining site specific suitability for habitation and development is both unworkable and illogical.

I believe this approach needs to be changed to be consistent with that used by Territorial Authorities in other areas in New Zealand and overseas when dealing with rockfall hazard.

---

Attached Documents

File
No records to display.



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

## Submitter Details

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

**First name:** Kurt **Last name:** Higgison

**Preferred method of contact** Email

### Postal address:

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** Kiwiphones@live.com

**Daytime Phone:** 039418999

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

I am not  
directly affected by an effect of the subject matter of the submission that :  
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Note to person making submission:

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 32.1

- Support
- Oppose
- Seek Amendment

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

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

### My submission is that

We have extensive development in the outer areas of the city already. Yaldhurst, Halswell and the north west suburbs, providing enough development already. We do not need to give developers more scope than they already do to disrupt the quieter established streets.

We need to make sure new areas grow into new areas, not encourage developers to bulldoze and disrupt established areas.

---

Attached Documents

File
No records to display.

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

## Submitter Details

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

**First name:** Paul **Last name:** Clark

**Preferred method of contact** Email

**Postal address:** 280D Worcester Street

**Suburb:** Christchurch Central

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8011

**Email:** paul.clark+ccc@spalge.com

### Daytime Phone:

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

I am not  
directly affected by an effect of the subject matter of the submission that :  
a. adversely affects the environment, and  
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Note to person making submission:

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 33.1

- Support
- Oppose
- Seek Amendment

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

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

**My submission is that**

Tree Canopy Cover and Financial Contributions

The council will require 20% of new residential developments to be covered by trees, or otherwise pay a financial contribution to

help the council plant more trees on public land. Christchurch has an appallingly low tree canopy cover rate of 13% compared to Auckland (18%) and Wellington (30%). Trees have a wide range of environmental, health, social and economic benefits and are important for the future of our city.

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

**Original Submitter:**

**Original Point:**

**Points:** 33.2

- 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**

High-Density Residential Zone

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

I support high-density housing near the city and commercial centres. We need to allow more people to live near services and amenities to reduce car dependency. This would allow more people to take active and public transport to commute, shop and play. I seek that the council enable 6 to 10 storeys for residential buildings near commercial centres.

**Original Submitter:**

**Original Point:**

**Points:** 33.3

- Support
- Oppose
- Seek Amendment

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

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

**My submission is that**

Sunlight Access Qualifying Matter

**Original Submitter:**

**Original Point:**

**Points:** 33.4

- Support
- Oppose
- Seek Amendment

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

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

**My submission is that**

- Low Public Transport Accessibility Area Qualifying Matter

Attached Documents

File
Paul Clark

**Cui, Aviva**

**From:** Generation Zero <noreply@123formbuilder.com>  
**Sent:** Wednesday, 3 May 2023 7:34 pm  
**To:** Engagement  
**Subject:** CCC District Plan Changes (PC14) - Generation Zero Quick Submit / 531

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

**Form Summary****1. First / Last name**

Paul Clark

**2. Email address**

paul.clark+ccc@spalge.com

**3. Postal Address**

280D Worcester St  
 Christchurch Central Christchurch  
 8011

**4. Trade competition/adverse effects:**

Option 1: I could not gain in trade competition through this submission

**5. Answer if you selected option 2 above:**

Are you directly affected by a possible effect of this plan change in a way that it:

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

**Chapter 6 - Tree Canopy Cover and Financial Contributions**

The council will require 20% of new residential developments to be covered by trees, or otherwise pay a financial contribution to help the council plant more trees on public land. Christchurch has an appallingly low tree canopy cover rate of 13% compared to Auckland (18%) and Wellington (30%). Trees have a wide range of environmental, health, social and economic benefits and are important for the future of our city.

I support the Tree Canopy Cover rules and Financial Contributions to restore our tree canopy. Trees are important in reducing emissions,

## Form Summary

providing shade and temperature control in the summer, alongside the other wide range of economic, health and social effects. I seek that the council retains the tree canopy requirement and contributions plan.

### Chapter 14 - Low Public Transport Accessibility Area Qualifying Matter

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

### Chapter 14 - Sunlight Access Qualifying Matter

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

### Chapter 14 - High-Density Residential Zone

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

I support high-density housing near the city and commercial centres. We need to allow more people to live near services and amenities to reduce car dependency. This would allow more people to take active and public transport to commute, shop and play. I seek that the council enable 6 to 10 storeys for residential buildings near commercial centres.

### Any other comments?

The message has been sent from 60.234.87.228 nz at 2023-05-03 on Chrome 108.0.5359.220  
 Entry ID: 71  
 Referrer: <https://www.generationzero.org/>  
 Form Host: <https://form.123formbuilder.com/6423130/ccc-district-plan-changes-pc14-generation-zero>

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

## Submitter Details

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

**First name:** John **Last name:** Goodall

**Preferred method of contact** Email

### Postal address:

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** johnjgoodall@gmail.com

**Daytime Phone:** 0273403602

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

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

Note to person making submission:

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

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 34.1

- Support
- Oppose
- Seek Amendment

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

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

Make Shirley a Medium Density Residential Zone

## Make Cherryburton Place a part of the Medium Density Residential Zone

### My submission is that

I submit that the designation of Shirley in general, and Cherryburton Place in particular, as part of a High Density Zone should be changed.

The Council proposal is to concentrate a High Density Zone zone around 'our larger commercial centres', and they include Shirley in this. Shirley is not a 'larger commercial centre' when compared to the other areas designated in that way.

- The Palms Mall has more square meterage than some other malls in the city, but this is partly due to the cinema on the second floor – it in fact has only about 17,000m<sup>2</sup> of retail space, making it smaller than most other suburban malls in Christchurch.
- A decent amount of that is currently vacant stores, and that is likely to increase when the big shopping mall is built up at HomeBase (Marshland Rd)
- Unlike other commercial centres in the city, the surrounding area has zero retail – the square metreage of retail in Shirley is minimal, and not dissimilar to The Tannery, where housing has been designated MDZ.
- The Palms shelved plans for expansion on to neighbouring land it owns because there was no commercial appetite for this, so commercial development is unlikely to happen there
- There are minimal transport links – a couple of buses infrequent (an often cancelled) buses into the city – the traffic on Marshland Rd is testament to this, as is the huge increase in street parking around the area. I would love to see comprehensive public transport from Shirley to the city, but with no plans to increase public transport options from the suburb, an HDZ will just create increased traffic, with all the attendant social and environmental problems
- This street is also right on the edge of the HDZ - there are in fact properties which are nearer the 'commerical centre' and on a more major road which are designated as MDZ (e.g. 36-68 Quinns Rd)

The proposal to build an HDZ in Shirley, based around a mall that is likely to shrink rather than grow, with no surrounding retail at all and minimal transport links to the city is clearly wrong. The proposal does not include an HDZ for residential housing near the Tannery, for example, which has more retail than Shirley.

Cherryburton Place is a small cul de sac in the proposed Shirley HDZ - the roads around this (eg. Hammersley Ave, Quinns Rd, Hercules St, Sabina St etc) are very wide, straight roads – 10m or so wide – which perhaps makes sense for multi storey housing. Cherryburton Place is a narrow cul de sac, meaning it could have 6-storey buildings 4 or 5 metres apart from each other. There would be no light, and no privacy for residents (particularly at the end the cul de sac, where the section are very close together. Parking/turning in small cul de sac with dozens of residents would be both dangerous and difficult. With no plans to create cycleways trying to cycle in the area would bring an increase danger when cycling.

---

### Attached Documents

File
No records to display.



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

## Submitter Details

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

**First name:** Geordie **Last name:** Shaw

**Preferred method of contact** Email

**Postal address:** 15 Nehru Place

**Suburb:** Cashmere

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8022

**Email:** geordie@shawandshaw.co.nz

**Daytime Phone:** 0278453095

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

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

Note to person making submission:

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

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 35.1

- Support
- Oppose
- Seek Amendment

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

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

**My submission is that**

In relation to rule 14.5.2.10 and other rules relating to road facing façade minimum glazing areas of 20%. Even with the reduction for a door, this figure seems arbitrary and is an extremely prescriptive and narrow way to achieve the intent of the rule - presumably improving street appeal and CPTED. However it has the unintended consequence of negatively impacting the thermal performance

of a home, especially when south facing.

I would recommend that the council create a means of favouring applicants who design to the policy and objectives of the plan rather than the letter of the law.

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Attached Documents

File
No records to display.

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

## Submitter Details

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

**First name:** Susan **Last name:** Barrett

**Preferred method of contact** Email

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** susanandjohn2002@hotmail.com

**Daytime Phone:** 0273423184

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

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

Note to person making submission:

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

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 36.1

- Support
- Oppose
- Seek Amendment

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

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

That all HDRZ developments over 2 storeys require individual building and environmental consent that is notified to the community and other affected parties

**My submission is that**

I believe the negative social and environmental costs of the high-density residential zones (HDRZ) proposed under PC14 outweigh

the government's hoped for benefits and would lessen the quality of life of Chch's residents, if PC14 is adopted as a blanket policy for housing development in our suburbs.

PC14 states - "We propose concentrating this zone [HDRZ] around our larger commercial centres, including the central city". But, Chch's suburbs are not 'large commercial centres' - they are suburban communities. To intensify housing in our existing suburbs on a blanket basis without the safeguard of individual, notified building consents raises the following problems:

#### 1. Loss of green space and beneficial flora and fauna

Our bee population has declined due to increased in-fill housing and Chch already has less green space than other large NZ cities. This affects the CCC's and NZ's macro goals of reducing our carbon footprint. Green spaces are vital in lessening the effects of flooding, erosion, and temperature fluctuations which are becoming more frequent with climate change and extreme weather events. *[A planning tool for Auckland Council estimates paving and building over 60% of a site (rather than 20%) can increase the rain runoff by 20 times. Eloise Gibson and Kate Newton Mar 16 2023].* Can Chch's current stormwater system cope with this given CP14 allows for "Cover up to 50 per cent of the site, with the option of 60 per cent site coverage when specific conditions are met"?

On the micro level high-density housing means children grow up without outdoor space to exercise and play safely in and families can't grow vegetables and fruit to alleviate economic hardship. Stress and people's mental health are also adversely affected by a lack of green space in cities.

There is well-documented evidence of the health risks of building too close to roads due to air and noise pollution from traffic – the HDRZ proposal [Housing to be set back 1.5 metres from front boundaries] does not go far enough with its obligations on developers to provide landscaping and a buffer of green space when they build. Paying a financial contribution to the Council to avoid planting obligations is no solution at all – what use is some extra money in the council's pocket to those in HD zones with no trees?

#### 2. New housing needs to be high-quality, sustainable and affordable housing not just plentiful housing.

PC14 should set minimum standards for example for new builds to have solar panels so that purchasers and renters can afford to pay for their electricity. It should also require developers to provide a percentage of social housing (or genuinely affordable housing) in any development over a certain size. Building more houses will not solve the housing crisis in Chch if people can't afford to buy or live in them.

#### 3. The transport infrastructure needs to be fixed first.

PC14 assumes a level of public transport infrastructure that Chch does not have. It assumes a behavioural pattern of workers living in small apartment-style dwellings in satellite urban centres and commuting to work by public transport. The reality is that people in Chch get in their cars. Where are all these cars going to be when people come home to their HDRZ?

#### 4. Local communities should not be shaped by the commercial interests of retail complexes.

For example, The Palms or Eastgate are small retail complexes by international standards and they do not justify zoning these suburbs as "large commercial centres". It would be a mistake to base HDRZs around suburban malls like this that are constantly struggling to get tenants and can come and go depending on whether business interests consider them to be profitable or not.

It is my submission that rather than wholesale non-consented HDRZ developments in Chch's existing suburbs, it would be preferable, more cost-effective, and quicker to apply these principles to forward-thinking, well-planned green field developments (with the right transport links) – for example Prestons Park could have been high-rise. In this way developers could be held

responsible for the costs of infrastructure, transport, and green initiatives and we would have more housing sooner without such a heavy financial burden falling on the Council and without destroying our existing suburban communities.

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Attached Documents

File
No records to display.

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

## Submitter Details

**Submission Date:** 06/05/2023

**First name:** Marjorie **Last name:** Manthei

**Preferred method of contact** Email

**Postal address:** 50 Gracefield Avenue

**Suburb:** Christchurch Central

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8013

**Email:** mm1946@xtra.co.nz

### Daytime Phone:

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

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 37.1

- Support
- Oppose
- Seek Amendment

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

Revisit the level of intensification proposed in PC14 and go only so far as needed to satisfy the minimum requirements of the NPS-UD and Enabling Housing Amendment Act. See attached submission for details, including which references and other documents were used to determine exactly what legislation does require.

**My submission is that**

My submission covers 5 ways PC14 goes much further than required by legislation (see attached submission, Part I, 1.1 - 5.16): (i) a u-turn from CCC's own initial position that NPS-UD should not apply to ChCh (ii) relying on inflated data over a 10-year period, when 'long term' is defined in legislation as 10 - 30 years (iii) ignoring the implications of the 10-year review period, also a requirement, which would allow CCC to start small, review impact of initial intensification and only then go any further (iv) extending the 'walkable catchment' from the usual convention of 800m/10 minutes to 1.2km-1.5km or 15-20minutes and including HDRZ north of Salisbury Street (which is well outside even those parameters and is not classified as 'high accessibility' in the available info) and (v) over-stating the 'capacity' issue and therefore proposing much greater heights in the City Centre, the 'edge', the HDRZ and specifically, sites such as the former Women's Hospital than required.

**Original Submitter:****Original Point:****Points:** 37.2

- 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**

13.5.2.1.2, 13.5.2.1.3, RD13 (a) (i) and (iii), 13.5.4.2.4 (a), (e)-(g) and (h); 13.5.5.1 - 13.5.5.5 (in particular 13.5.5.2 (a) (vi) and (viii) and 13.5.5.5 (b)). However, in some cases the above are not reflected in the Rules and/or need minor revisions. See attached submission (paras 7.1 - 7.8).

I also oppose several provisions, with related Requests (entered separately because of how this form is set up).

**Original Submitter:****Original Point:****Points:** 37.3

- 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***

Amend the above so there is a uniform maximum height of 18m, at 10m from southern boundary, recession plane from points 2.3 above internal boundaries (retaining RD13 (a) (i) and (ii) and 13.5.4.2.4 (h)). See attached submission, paras 7.8 - 7.10.

**My submission is that**

Related to the former women's hospital site: I oppose RD13 (b), 13.5.4.2.4 (d) (i) and (ii) re recession plane. Provisions that I support are covered in previous section on this form. See attached submission, paras 7.8 - 7.10. for details and rationale.

**Original Submitter:****Original Point:****Points:** 37.4

- Support
- Oppose
- Seek Amendment

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

**My submission is that**

I support (or at least do not oppose) many of the Policies and Objectives in 14.1, 14.2, 14.6 and 14.15 although some require amendments to reflect what I assume are the intentions. Details are included in the attached submission, paras 8.1 - 10.4.

I oppose other provisions, with corresponding requests (entered into the next section of this form).

**Original Submitter:****Original Point:****Points:** 37.5

- Support
- Oppose
- Seek Amendment

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

Clarify that 'surrounding area' (14.2.7.3) does not include north of Salisbury Street; Delete 14.2.7.6 (a) (i) and (iii); Amend 14.2.9.2 (b) (i) to include only the City Centre Commercial Business & Mixed Zones. Refer para 8.5 of attached submission.

Amend maximum height in HDRZ from Salisbury St to Bealey Ave to 14m, with current residential recession plane; restrict RD max height to 20m; Delete 14.6.2.1 (b) and amend 14.6.2.2 (b) so the current recession plane applied, regardless of height. Also request a new rule requiring vehicle bay in multi-unit developments of 3 or more units. See attached submission 9/4 - 9.6 for details and rationale.

**My submission is that**

14.2.7.3, 14.2.7.6 (a) (i), 14.2.7.6 (iii) and 14.2.9.2 (b) (i). Details and rationale included in attached submission, para 8.5.

RD14.6.1.3, RD 7 & 8, 14.6.2.1 (b) and 14.6.2.2 (b) because of the proposed heights and/or inadequate recession planes / setbacks. See attached submission, paras 9.2 - 9.6.

**Original Submitter:****Original Point:****Points:** 37.6

- Support
- Oppose
- Seek Amendment

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

Delete 14.15.31 (b) and 14.15.33 (d) for reasons set out in attached submission, paras 9.1 - 9.6

Rewrite and expand 14.15.30 (a-c) to provide further protection from tall buildings in neighbourhoods (see attached submission, paras 9.1-9.6).



**My submission is that**

Oppose in part 14.15.31 (b) and 14.15.33 (d) that could allow reduced recession planes or setbacks for 'cost effective' or 'practical use' reasons.

Note that I also support some of the provisions in 14.15 and request an amendment to 14.15.30 (a-c).

**Original Submitter:****Original Point:****Points:** 37.7

- Support
- Oppose
- Seek Amendment

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

Support most of the Objectives, Policies and Standards, except in some cases they need to apply to Commercial/Industrial sites as well and/or to be strengthened (e.g. FCs). Because of the way this form is set up, I've included requests and reference to one provision I oppose in a separate section.

Refer attached submission, paras 11.1 - 11.10

**Original Submitter:****Original Point:****Points:** 37.8

- Support
- Oppose
- Seek Amendment

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

Add minimum 10% tree coverage for commercial/industrial sites (as originally proposed).

Increase min coverage for residential sites to 25%.

Add a rule to reduce use of impervious or impermeable surfaces on residential & commercial sites.

Rewrite 610A.4.2.2 (a) (see attached submission, para 11.8).

Increase FC to at least \$4074/tree (see attached submission).

**My submission is that**

I oppose removal of the 10% tree coverage for commercial/industrial sites and think the FC needs to be increased to act as a real deterrent to removing / not replanting on the site. (see requests below). Refer attached submission, paras 11.1 - 11.10.

**Original Submitter:****Original Point:****Points:** 37.9

- Support
- Oppose
- Seek Amendment

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

Delete the above.

**My submission is that**

15.2.6.7 (a) (ii) on the grounds covered in attached submission (para 12.1 - 12.3). See request below

**Original Submitter:****Original Point:****Points:** 37.10

- Support
- Oppose
- Seek Amendment

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

Revisit the level of intensification proposed (refer Part I of attached submission re 'going further than required').

Reduce max height in City Centre from 90m to 60m (north to Kilmore St);

Allow max height up to 40m from Kilmore to Salisbury St;

Reduce max heights on Victoria St (Salisbury to Bealey) to 20m (45m from Kilmore to Salisbury St), to maintain the 'cascade' principle).

Reduce Permitted height in HDRZ from Salisbury to Bealey to 14m (20m RD, with current residential recession plane).

**My submission is that**

Oppose max height of 90m in City Centre, 45m on Victoria St (from Salisbury St to Bealey Ave) and anything over 20m in HDRZ from Salisbury to Bealey Ave.

As covered in the attached submission, I SUPPORT the 'cascading' principle, with greatest height in City Centre, reducing at the 'edge' and then reducing even more in the RDRZ further north. However, the proposed heights are greater than required by legislation---see PART I of attached submission and Part III, Sections 8 - 10).

See PART II of attached submission re Victoria Street (paras 6.1 - 6.9).

**Original Submitter:****Original Point:****Points:** 37.11

- Support
- Oppose
- Seek Amendment

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

A uniform max height of 18m, at 10m from southern boundary, with recession plane measured from points 2.3m above internal boundaries and retaining RD13(a) (ii) and (iii) as written and 13.5.4.2.4 (h) re max building coverage of 60%. See attached submission for full discussion of this site, including background to mediation agreement during Replacement District Plan hearing..

**My submission is that**

Refer attached submission, Section 7 (paras 7.1 - 7.10 re the former women's hospital site. I support some of the Policies and Standards, but oppose the max height, given issues with recession plane and setback. See Requests below).

**Original Submitter:****Original Point:**

Points: 37.12

- Support
- Oppose
- Seek Amendment

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

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

Remove HDRZ from Salsibury St to Bealey Ave from the 'walkable catchment' north of City Centre. Refer attached submission, paras 4.1 - 4.10 for rationale, including reference to the official definition of walkable catchment and distances/walking times from the above area to services, including supermarkets.

**My submission is that**

See attached submission, paras 4.1 - 4.10 re 'walkable catchment' in relation to the area north of Salisbury Street.

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Attached Documents

File
PC14 Submission-M Manthei 2 May 2023

## Submission on Plan Change 14: Housing and Business Choice (Marjorie Manthei) 2 May 2023

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### Introduction

I have lived in a Central City neighbourhood (north of the Square) for over 30 years. Although I am interested in the impact of Plan Change 14 on all of Christchurch, my focus is on what I know best—the City Centre and the High Density Residential Zone surrounding it.

I gave written feedback on the National Policy Statement (Urban Development), the Enabling Housing Supply Amendment Act, the initial version of Plan Change 14 and the related Urban Forest Plan. I attended several City Council briefings and Council meetings, participated in the Greater Christchurch workshop and registered for both of the Council webinars. I also used the Friend of Submitters service and had a brief conversation with Community Law. I was an active participant in the 2015-2015 District Plan Review.

Despite the above, it was difficult to come to grips with what PC14 actually says and, more importantly, why it was decided to go so much further than what legislation requires.

My submission covers the following:

PART 1 Doing more than required, including the U-turn, definition of ‘long term’, duration of PC14, walkable catchment and height.

PART II Victoria Street and Special Purpose Hospital Zone.

PART III Specific provisions, including Chapter 14 (Residential), Chapter 6.10A (Tree canopy), and 15.2 (Entertainment and hospitality).

### PART I: DOING MORE THAN REQUIRED

References used:

- Christchurch City Council submission on the National Policy Statement on Urban Development (cover letter, Mayor Lianne Dalziel, 2 October 2019)
- Submission to the Select Committee on the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill (Mayor Dalziel, 18 November 2021)
- Letter to Minister Parker after CCC voted not to notify PC14 (Mayor Dalziel, 20 September 2022)
- Section 32: Part 1, Appendix 1 Christchurch City Council Updated Housing Capacity Assessment (February 2023)
- National Policy Statement on Urban Development 2020 (July 2020)
- Understanding and implementing intensification provisions for the National Policy Statement on Urban Development (September 2020)
- Chapter 3 Strategic Directions (Notified version)
- Section 32 Evaluation: Commercial and Industrial sub-chapters (Part 4) and associated documents, Issue 1 – Policy 3A (City Centre Zone intensification response) and Issue 2 – Policy 3c (ii) (Intensification response within a walkable catchment of edge of City Centre Zone, commercial zones)
- Section 32 Appendix 1 Background to Central City Height and Density Controls Technical Report (18 July 2022)

#### 1 Doing more than required: A U-turn

1.1 When the City Council raised its concerns about the NPS-UD in its 2019 submission, many assumed CCC would end up doing only what was absolutely necessary to meet legislated requirements. Although some things have changed since then, the thrust of CCC’s arguments has not, e.g.,

- (a) *“...that the approach is better suited for cities that have an identified housing shortage, such as Auckland. Christchurch City does not have a housing capacity issue”* (para 5);

- (b) *“The proposed NPS-UD is likely to require greater intensification than what is enabled in Christchurch’s recently developed District Plan, without considering the local priorities specific to Christchurch”* (para 30).
- (c) *“This policy approach provides more than sufficient development capacity to meet projected long-term needs”* (para 32).

- 1.2 Similar details were provided in 2021 to the Select Committee on the Enabling Housing Supply Amendment Bill, e.g., *“Our central city has a minimum 50 households per hectare requirement—we have height limits that are sympathetic to the post-earthquake environment and our ground conditions”* (p 2).
- 1.3 The above means density was achieved with a maximum height of 28m in the City Centre and 11-14m in Central City Residential Zones. The Rule requiring at least one dwelling for every 200m<sup>2</sup> within CCRZ significantly increased density. The Victoria Neighbourhood Association conducted a “dwellings census” to calculate density pre-earthquakes in our neighbourhood and compared that to 2021. Intensification had increased markedly, even without builds of more than three stories.
- 1.4 In 2022, after Council voted not to notify the Plan Change, the Mayor wrote an explanatory letter to Minister Parker (20 September 2023), setting out even more clearly why some of the NPS-UD requirements should not apply to Christchurch: *“One of the key drivers of the legislation is to ensure that land supply for housing is sufficient both in the short term and the longer term; however, unlike other Tier 1 centres, Otautahi is in the unique situation of having sufficient land capacity for housing in the short, medium and long term”* (para 4 of Attachment 1, emphasis added).
- 1.5 The notified version of PC14 goes well beyond what is required by legislation, particularly in terms of height and walkable catchments. We are faced with the possibility of whopping 90m building/s in the City Centre and 32m buildings on very small sections in nearby HDRZs. All the data, reports and analyses providing what appear to (i) be lukewarm support for intensification at the proposed level and/or (ii) contradict the assumptions on which PC14 is based. *See further comments below.*

## 2 Doing more than required: Definition of ‘long term’

In various City Council briefings and the Greater Christchurch workshop, reference was made ‘long term’ population and housing projections, often defined as a 50-year period. We were told that projecting this far was required by legislation and to “future-proof” decisions. That isn’t true—‘long-term’ is defined as 10 – 30 years (NPS-UD document, Definitions). Most of Stats NZ and Infometrics data projections go to 2048. Referring to a 50-year period is another example of going further than legislation requires.

**Request:** When reconsidering any provision/s in the notified version of PC14, base decisions on the required 10-30-year period.

## 3 Doing more than required: Duration of PC14 provisions

Chapter 3 (Strategic Directions) says *“Council must commence a review of the... district plan within 10 years...meaning that this Plan is likely to have a life of not less than 10 years”* {clause 3.1 c). Given this, it’s even more important that PC14 starts small in terms of height and other intensification factors, then reviews the impact of those changes, along with population and capacity. And only then should ‘more enabling’ changes be made, based on actual data.

**Request:** That the 10-year timeframe drives the necessary changes for PC14 to meet the required legislation, but goes no further.

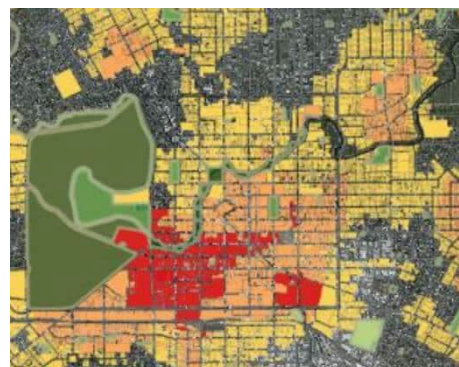
## 4 Doing more than required: Walkable catchment

- 4.1 Both ‘Understanding and Implementing NPS-UD’ and s32 Accessibility Qualifying Matters (Appendix 50) refer to the standard convention of a walkable catchment being *“400 – 800m.... used for most*

*Tier 1 cities... (extended for larger tier 1 urban environments)*” and “*within planning work*” (para 5.5.2 and 4.1.3, respectively). The NPS-UD does not stipulate how ‘walkable catchments’ are defined, although it does refer to 400-800m as “*typical*” (section 5.5).

- 4.2 The notion of the ‘20 Minute City’ is the time needed “*to walk from home to a destination and back again*” (s32, para 4.1.3), i.e., a 10-minute walk one way, equal to approximately 800m, or 20 minutes round trip. A Google search of the concept confirms “*The 20-minute neighbourhood is all about ‘living locally’ and enabling people to meet most of their daily needs within a 20-minute return walk from home*”.
- 4.3 However, for PC14, the ‘walkable catchment’ was extended to 1.2 – 1.5km or 15 minutes (a 30-minute round trip). The only rationale I could find was that Christchurch is flat, with good footpaths (para 4.1.2). Christchurch is not a ‘larger’ Tier 1 city, and it’s acknowledged that we have no rapid transit; therefore, the ‘walkable catchment’ is the primary focus for deciding where greater residential intensification should be enabled (para 3.1.3).
- 4.4 The purpose of determining the ‘walkable catchment’ is to meet the Accessibility criteria for residential intensification and enable at least 6-storeys from the City Centre edge. A Density Enablers Model was used to identify the most suitable areas, taking into account core public transport routes, cycleways, supermarkets over 1000m<sup>2</sup> and accessible services/facilities (para 2.1.2). Supermarkets and proximity to the city centre obtained the highest Enabler scores (supermarkets need to be within 400m, considered the “*core factor in ability of centre to provide key services*” (Appendix 1 of same document).
- 4.5 Accessibility refers to “*level of service as a whole and defines people’s overall ability to reach desired services and activities*” (Understanding and Implementing NPS-UD, section 5.4). It’s not just distance that determines the ‘walkable catchment’.

- 4.6 The areas with the highest accessibility index are “*around the south of the central city area*” (red on the Density Enablers Scores table); the areas to the north are designated yellow, with relatively low scores (s 32 para 2.1.4).



- 4.7 One of the reasons it takes longer to walk from the north to standard services is because of having to walk through Cathedral Square and/or Victoria Square before arriving where banks, ATMs, small supermarket, pharmacy, dry cleaners, shops etc are located. Note, there is no large supermarket within even 1.2km from the north.
- 4.8 Accessibility calculations from myself and neighbours (some regular walkers to the City Centre and some who usually drive); all are one-way times:
- Peacock St to Bridge of Remembrance (start of closest services hub): 22 mins / 1.5km
  - Peacock St to Forte health (pharmacy): 20 mins / 950m
  - Salisbury-Colombo cnr to nearest (small) supermarket on Lichfield Street: 14.5 mins / 1.4km
  - Gracefield Ave to Cashel Mall: 18 minutes / 1.5km
  - Beveridge St to Tūranga: 20 mins / 1.3km (mother with 8-year-old)
  - Beveridge St to Art Gallery: 20 mins / 1.3 km (woman with slight mobility problem)
- Other relevant distances:
- Salisbury St to New World supermarket (Durham St): 2.1km; from Peacock St, 2.2km; from Gracefield Ave, 1.9km
  - Peacock St to Town Hall: 1.1km; Beveridge St to Town Hall: 950m

- Montreal/Conference cnr to Cashel Mall: 1.8km
- 10-minute walk from Durham-Conference corner, arriving at Worcester St/Oxford Tce, passing no basic services such as banks, ATM, pharmacy, dry cleaners, shops etc;
- 800m from Durham/Gracefield, arriving at Crowne Plaza, Armagh St (also not where basic services are located).

4.9 The Density Enablers Model was a “*principal element underpinning the Council’s proposal, specifically where the greatest heights...and densities are enabled*” (s32, Part 1 Overview, para 3.3.4). The Model does not identify the area north of the City Centre as “high accessibility”. Our calculations of walking times and distances to services in or near the City Centre also confirm distances greater than 800m or 1.2km, taking more than 10 or 15 minutes.

4.10 Regardless of this, PC14 still considers Salisbury Street to Bealey Avenue within a ‘walkable catchment’ and, therefore, requires a minimum height of six storeys (up to 10 in some parts of the neighbourhood) . Another example of PC14 going further than required and being inconsistent with many of the reports cited.

**Request:** That Salisbury Street to Bealey Avenue is removed from the ‘walkable catchment’ area from the edge of the City Centre.

## 5 Doing more than required: Height and Capacity

- 5.1 Policy 3 of the NPS-UD requires District Plans to ‘... *enable in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification*’ and “*building heights of at least 6 storeys within at least a walkable catchment of... (i) existing and planned rapid transit stops (ii) the edge of city centre zones and (iii) the edge of metropolitan central zones*”. The s32 report confirms only (ii) is relevant to Christchurch at this point.
- 5.2 The step-by-step ‘Understanding and Implementing’ guide describes what ‘as much as possible’ means, “*taking into account local circumstances and factors—specifically, the level of demand and accessibility*”. It instructs local authorities to “*ensure the specific outcome of enabling as much development capacity as possible is consistent with the wider NPS-UD policy direction*” and that it “*will ensure a well-functioning urban environment is achieved*” (6.2).
- 5.3 Although greater than six storeys is expected, the NPS-UD does not specify how much greater. “*Tier 1 local authorities should be considering the level of demand and accessibility in determined what height and densities can be enabled*” (6.2 of the guide). It does not say how high, how dense or exactly where.
- 5.4 Christchurch already has adequate capacity and density, e.g., “*The Greater Christchurch Housing Capacity Assessment of 2021 assessed Christchurch has having a surplus of 83,000 dwellings over the medium term (2011-2031) and 60,000 dwellings over the long term (2021-2051)*” and “*...the evaluation...indicates that the impact on the development capacity with all (notified) qualifying matters in place, will still result in a significant dwelling surplus*” (s32, para 3.2.2).
- 5.5 Stats NZ’s medium projection for the next 15 years (reported in the s32 Overview document, p 24) is from just over 500,000 to 568,300 by 2028 and 614,300 by 2038. Their website includes a projection of 653,000 by 2048 (463,500 in Christchurch). The conclusion in the 2023 CCC Updated Housing Capacity Assessment is that “*... the level of enablement across the city is significant and well exceeds projected demand in both the 30yr long term period and when considered against a 50-60yr or the one million population scenario*” (p 5).
- 5.6 A cost-benefits analysis of various options covering height, setbacks and recession planes was completed (s32 Commercial & Development Report). It says no “*quantification of the development capacity enabled under the Status Quo option, compared with other options*” was done. So, we don’t

know whether the benefits of PC14 would be greater than, equal to or less than the status quo, or if PC14 actually would “*maximise the benefits...in the way or to the extent anticipated by the NPS-UD*” (p 59). Regardless of this shortcoming, PC14 proposes a significant increase in the maximum height within the City Centre, with its flow-on effects into other nearby area/zones.

- 5.7 We do know “*the latest assessment of business land capacity in the central city concludes that even the Status Quo scenario provides more than sufficient plan enabled development to meet forecast demand to 2048*” (p 65). Economist David Dyason (Lincoln University) goes even further, with the same forecast to 2051.
- 5.8 The s32 Overview document also concludes, “*The level of enablement being considered under PC14, is likely to provide for a population well exceeding projected long term growth rates. Therefore, a ‘needs’ driven response is not required*” (para 2.3.7).
- 5.9 The reasons covered in the CCRP for a low-rise redeveloped central city also are still valid. I could find nothing in s32 or others reports to refute them: (i) to achieve a more compact core (ii) for better urban design (“*lower buildings...encourage greater interaction with the street and public spaces*”, produce less shadowing and wind tunnel effects, feel safer and are people-friendly). Low-rise would also give Christchurch a unique identify (Summary from Background to Central City Height, Appendix 1, s32, Part 7).
- 5.10 A vast amount of material was generated to assist with PC14 development, including (i) data confirming we have sufficient capacity to meet demand up to and exceeding long-term projections of 10 – 30 years (ii) intensification already achieved within the City Centre and its adjacent residential zones (iii) residents’ feedback about what they wanted the CBD to look like post-earthquakes and (iv) reservations from the former Mayor, Councillors, residents and writers of many of the s32 and associated reports.
- 5.11 Enabling heights up to 90m in the City Centre and 32m in neighbourhoods such as mine—with minimal setbacks and inadequate recession planes—is inconsistent with the above. It appears that s32 and other reports addressing issues such as loss of sunlight, privacy, safety and amenity have largely been ignored when it comes to the ‘social, economic and cultural wellbeing’ of people living in central city neighbourhoods close to, but outside, the City Centre.
- 5.12 Summary: I believe the rationale underpinning the notified version of PC14 overstates the level of intensification required by legislation. At the same time, it ignores or downplays what ‘long term’ means in this context (30-year period) and the implication of PC14’s 10-year life span. The outcome of these deficiencies includes (i) a greater-than-required enabled height in the City Centre (ii) an expanded walkable catchment and (iii) flow-on effects of unwarranted heights on Victoria Street (45m), the former women’s hospital site (32m) and between 20 - 32m heights in various parts of the HDRZ north of the City Centre.
- 5.13 The only—and easiest—way to solve this is to reduce the maximum height in the City Centre, with corresponding reductions in heights nearby. The ‘cascading level of enablement’ would stay intact, and the benefits of intensification realised.
- Request:** That the level of intensification be re-visited, and that PC14 goes only as far as it must to satisfy the minimum requirements of NPS-UD and Enabling House legislation.
- 5.14 I support the ‘cascading’ principle (shown in s32 Overview, Appendix 1), with the tallest buildings enabled within a strictly defined City Centre, slightly lower heights around the edge (within 800m) and even lower in the HDRZ north of the City Centre.
- 5.15 I oppose an enabled height of



- (a) 90m in the City Centre,
- (b) 45m on Victoria Street and
- (c) anything over 20m in the HDRZ from Salisbury Street to Bealey Avenue.

**Rationale:** Enabling such heights, especially with inadequate setbacks and recession planes, does not satisfy the NPS-UD outcome of “*delivering a well-functioning urban environment, which enables all people and communities to provide for their social, economic and cultural wellbeing and for the health and safety, now and into the future*” (Understanding and Implementing guide, p 30).

#### 5.16 Requests:

- (a) Decrease maximum height in the City Centre from 90m to 60m as far north as Kilmore Street (more enabling than the current Permitted 28m).
- (b) Allow for maximum height of 40m from Kilmore Street to (but excluding) Salisbury Street.
- (c) Reduce the proposed maximum heights on Victoria Street (from Salisbury Street to Bealey Avenue) to 20m and in the HDRZ from Salisbury Street to Bealey Avenue to 14m Permitted and 20m RD (with current residential recession planes).

**Rationale:** Reducing the maximum height in the City Centre still allows for greater density. It would also resolve the flow-on effects of the proposed heights in the HDRZ near the City Centre, especially to the north, where ‘accessibility’ is assessed as relatively low, especially compared to south of the City Centre (s32 Accessibility, 2.1.4)

## PART II: VICTORIA STREET AND FORMER WOMEN’S HOSPITAL SITE

### 6 Victoria Street

#### 6.1 References used:

- Section 32, Lower height limits: Victoria Street & Cathedral Square—Qualifying Matters (Jacqueline Chester, 9 August 2022); Appendix 29 Part 2 – Qualifying Matters Part 3
- Appendix 2: Victoria Street Urban Form—Building Height Study (from same document as above)
- Section 6.27 Victoria Street Building Height; Section 32 evaluation (from same document as above)
- Section 32 Technical Report Accessibility—Qualifying Matters (Jac Chester, 19 July 2022); Appendix 50, part 2 (Chapters 6, 8,...)

#### 6.2 The s32 report acknowledges the proposed maximum height of 90m in the City Centre would be inappropriate for Victoria Street (para 4.1.2 and 5.1.5). Reasons include

- that it’s surrounded by residential zone,
- is a ‘narrow strip’ of commercial activities, and
- has an established history of lower heights.

Also, the District Plan excludes Victoria Street from the Central City Business Zone (para 6.27.5 of Appendix 29).

#### 6.3 The above doesn’t fully capture the unique feature of the street from the Montreal-Salisbury-Victoria Street intersection up to Bealey Avenue. Along that stretch, the street forms a triangle, with no buffer between Victoria and Montreal Streets. This means that buildings that front onto Victoria Street back directly onto Montreal Street, straight across from a row of historic cottages. There is a walk-way connecting the two streets, as shown in the photos below.



*All the buildings on the east side of Victoria Street back onto the west side of Montreal Street, which is a residential neighbourhood. Having tall buildings on this stretch would be inappropriate for the reasons covered in the s32 report.*

*These photos show the 'triangle' and walkway through to Montreal Street.*

- 6.4 This configuration was the primary reason that the City Council agreed with residents in 2013 that Victoria Street should be treated differently from 'the city centre' for purposes of the proposed Local Alcohol Policy. Because of its proximity to a residential neighbourhood, alcohol licenses were not to exceed 1:00am (compared with 3:00am or later south of Peterborough Street).
- 6.5 Another feature not covered adequately in the s32 report is the loss of many day-to-day services on this stretch of the street since the earthquakes. There is no supermarket, deli or fruit/vege shops; no post office; no pharmacy; no bank or ATM machine (unless visiting the Casino). The residents' association talked with two banks and the post office in 2015 and again in 2019 to see if there was any commitment to bringing back such services. Answer: No. This is important, given the Proposed Enablers, Catchment and Scores used to assess 'walkable catchments' (Appendix 1, s32: Accessibility), p 16). Supermarkets, for example, are identified as a 'core factor', within a 400m walkable distance.
- 6.6 From the Salisbury Street corner to Bealey Avenue, there are cafes, bars and restaurants (although fewer than pre-earthquakes); parking lots; office buildings, some with services available to the public and some not; unused facilities such as the National Radiation Lab; social services, a church and the Navy; several small shops and larger furniture stores. Except for cafes, local residents must travel into Cashel Mall in the City Centre, to Edgeware or to one of the shopping malls (Merivale, Northlands)—all well outside the walkable catchment concept.
- 6.7 The s32 report recommends a maximum height of 45m (not 90m), which is still considerably higher than the current 17m. The reasons given (i) to "reinforce the primacy of the Central City" (Scenario 3, Section 7 of the report) and (ii) give consideration to the effects of "shading and visual impact of any towers.... on the adjacent residential zones" (para 6.27.6, Appendix 29).
- 6.8 Appendix 2 looks at three scenarios re capacity and urban form, but there is no analysis of the 'status quo' (17m on Victoria Street) or the pre-earthquake maximum height (30m). It estimates the reduction in development capacity between 90m and 45m as "only 4.3%...and is not considered an issue..." (p 214). Given all the data confirming sufficient (or even surplus) capacity for at least the next 30 years, it's a safe assumption that the impact of reducing Victoria Street to 20m would be minimal.
- 6.9 **I agree with**
- the reasons for a lower maximum height on Victoria Street, relative to the City Centre
  - the 'cascading' principle, starting from the highest in City Centre (but not 90m)
- I oppose**
- a maximum height of 45m on Victoria Street
  - anything higher than 14m on the surrounding Victoria Street Precinct.
- Requests:**
- Retain 45m maximum height on Victoria Street from Kilmore to Salisbury Streets (to maintain the 'cascading' principle).
  - Reduce maximum height to 20m on Victoria Street from the Montreal – Salisbury Street intersection to Bealey Avenue.

- (c) Reduce maximum height in the residential zone of the Victoria Street Precinct to 14m, provided the current residential recession plane is retained.

**Rationale:** The ‘cascade’ approach would be protected, with the relative difference of 50% between the City Centre and Victoria Street, giving the City Centre primacy.

## 7 Former Christchurch Women’s Hospital site (Chapter 13.5)

### 7.1 References used:

- Chapter 13.5 Specific Purpose (Hospital) Zone
- x32 Appendix 2 Technical Review of Specific Purpose-Hospitals Provision (William Field) 10 March 2023
- Statement of Evidence, District Plan Review re City Hospital Zone (Dr Marjorie Manthei and Victoria Neighbourhood Association, 13 January 2016) and Mediation Agreement (CDHB, CERA, CCC, Marjorie Manthei), 10 February 2016.

- 7.2 The former Christchurch Women’s Hospital, demolished in 2009-2010, was located on what is now a vacant site extending from Colombo to Durham Street, bisecting residential land with original and new dwellings on both its north and south boundaries. There is no buffer between the site and Gracefield Avenue houses (on the site’s southern boundary). A large apartment building facing Durham Street is on the site’s northern boundary. *See photos below*



*Photo on left shows only dwellings from 58 – 42 Gracefield Avenue. The rest to the east are hidden. Photo on right shows more dwellings on the same side, including 20 apartments at 871-873 Colombo Street and a house at 24 Gracefield Avenue. There is a total of 14 dwellings, plus the 20-apartment building, along the southern boundary of the site (five of which are or will soon be developed into more multi-unit dwellings).*



*40 apartments (Madison) at 400 Durham St, on the site’s northern boundary. Other buildings along this boundary include a rest home / dementia facility on Colombo Street.*

- 7.3 My husband and I live on the site’s southern boundary and know that, when the 5-storey Nurses’ Hostel was behind us, we had no sun from 11:00am to 2:00pm in the winter. As shown in the photo below, that building sat perpendicular to Gracefield Avenue, was very narrow and was setback from the ‘paper road’ running between Colombo and Durham Streets. *See photo below*



*Nurses' Hostel on former Women's Hospital site (five storeys), prior to demolition in 2009*

- 7.4 We provided arguments at the District Plan Review for reducing the notified height and setbacks from a maximum height of 18m at 10m from boundaries and 11m at 5m from boundaries, with no recession plan standard. We provided an architect's drawing showing that dwellings on the site's southern boundary would lose direct sunlight for slightly more than eight months/year, even at 18m height, described by the architect as being "like living at the base of the Hoover Dam!"; it would also be similar to living next to the majestic Tana Mahuta in Northland, with a trunk height of 17.7m!
- 7.5 Mediation resulted in a compromise: a uniform 14m height, with the residential recession plan and 10m setbacks. None of the negative effects of a tall building on such a site have changed, which means 32m on any portion of the site would be unacceptable.
- 7.6 I note that the PC14 s32 report recommended a maximum height of 20m on the site's northern boundary and 32m on its southern boundary. This is absurd, given the greatest impact of tall buildings is on the northern boundary of any adjoining residential properties. If this report influenced the PC14 proposed height, setbacks and recession planes at all, then a complete re-think of the provisions is needed.
- 7.7 **I support**
- (a) **Policy 13.5.2.1.2 Comprehensive Development.** However (ii) and (iii) in particular are not reflected in the Rules/Standards for the former Women's Hospital site. *See below*
  - (b) **Policy 13.5.2.1.3** re returning the site to residential development if no longer needed for hospital purposes.
  - (c) **RD13 (a) (i) and (ii)** requiring a 10m setback from any boundary at the maximum height of 20m and the provisions re length of buildings or corresponding recessions. *However, I request that the maximum height allowed on the former Women's Hospital site be reduced from 32m to 18m (see below).*
  - (d) **Built form standards 13.5.4.2.4 (a)** re setback from road boundary and **(e) – (g)** re landscaping and fencing; I also **strongly support (h)**, restricting the maximum building coverage on the women's hospital site to 60%.
  - (e) **Matters of discretion 13.5.5.1 – 13.5.5.5** re context and character, design, fencing/screening, outdoor storage and landscaping. **In particular, I strongly support 13.5.5.2 (a) (vi)** re minimising overshadowing, privacy and dominance effects on residential neighbours (including on habitable rooms or outdoor living spaces), **(a) (viii)** re modulation of design features and **13.5.5.5 (b)** re tree canopy on the former Women's Hospital site.
- 7.8 **I oppose RD13 (b), including 13.5.4.2.4 (d) (i) and (ii) re recession plane.** These provisions would allow 32m tall buildings, with what I think is an inadequate recession plane standard. Even with the proposed 10m setback from boundaries, this would result in negative effects along the site's southern boundary in particular. The current provisions, achieved through mediation during the

District Plan Review in 2015 - 2016, is a maximum height of 14m, with a recession plane from a point 2.3m above internal boundaries, a 4m setback from road boundary and 5m from internal boundaries. PC14 is too far away from that for me to support.

**Requests:**

- (a) a uniform maximum height of 18m (an increase from the current maximum height),
- (b) at 10m from the southern boundary,
- (c) with a recession plane measured from points 2.3m above the internal boundaries,
- (d) retaining RD13 (a) (i) and (ii) as written and
- (e) retaining 13.5.4.2.4 (h) re maximum building coverage of 60%.

- 7.9 My request (above) provides for a taller building than currently enabled, but by (i) maintaining the 10m setback, (ii) using the residential recession plane at least on the southern boundary and (iii) retaining the PC14 restrictions on a continuous building footprint, the negative effects should be effectively managed.

**PART III: SPECIFIC PROVISIONS (CHAPTER 14, 6 AND 15.2)**

**8 Chapter 14 Residential (14.1 – 14.2)**

8.1 References used (including for 14.6 and 14.15):

- s32 Part 3 Residential District Plan Chapter 14 Section
- Chapter 14 Residential (14.1 – 14.2)
- Chapter 14.6 Rules-HDRZ
- Chapter 14.15 Rules-Matters of control
- Part 3-Residential District Plan Chapter 14 Appendix 9: Property Economics report, August 2022

8.2 I **support the following provisions** (although in some cases they are not reflected in the corresponding rules):

- (a) Objective 14.2.1 (a) (i) *“enable a wide range of housing types, sizes and densities....”*
- (b) Policy 14.2.1.7 in full, re monitoring and review
- (c) 14.2.3.7 (a) (i-iv) re managing increased heights
- (d) Policies 14.2.5.1, 5.2, 5.3 and 5.5 covering character, amenity, safety, quality and wind effects.
- (e) Policy 14.2.6.1 MDRS Policy 1, enabling *“a variety of housing”*
- (f) Objectives and Policies 14.2.7, 2.7.1, 2.7.2 re HDRZ (I do not support the specifics in 14.2.7.3 – 14.2.7.5, for reasons given below)
- (g) Policies 14.2.9.1 and 14.2.9.6 re non-residential and retailing activities
- (h) Policy 14.2.9.8 (a) (i) (iii) and (v) re non-residential activities in the Central City residential area (request an amendment to (ii)—see below).
- (i) Policy 14.2.11.1 (a) re hosted visitor accommodation (request change in wording for (b)—see below).

8.3 I **support the intention** of the following, but request amendments:

- (a) Objective 14.2.9 (a) (i-iii) Non-residential activities  
**Request:** Amend (a) (iii) as follows: *“restrict other non-residential activities, unless the activity has a **proven** strategic or operation need to locate within a residential zone, **supported by a strong rationale and evidence**”.*

**Rationale:** Experiences with a similarly written Objective proved it is too easy for applicants to claim a “strategic or operational need”, without providing more than a statement to that effect. It makes no sense to enable greater residential intensification and then approve non-residential activities. However, I do not have an issue with “home occupations”, provided the owner lives on site (14.2.9 a i).

- (b) Policy 14.2.9.2 Community activities and facilities  
**Request:** Amend (a): *“Enable community activities and community facilities within residential areas if they meet identified needs of the immediate local community...and...”*. **Rationale:** As above.
- (c) Policy 14.2.9.5 Other non-residential activities  
**Request:** Amend *“Restrict the establishment of other non-residential activities.....unless the activity has a **proven** strategic or operational need to locate within a residential zone, supported by a strong rationale and evidence.....”*. **Rationale:** as above.
- (d) Policy 14.2.9.8 (a) (ii)  
**Request:** Amend *“ensure non-residential activities are focussed on meeting the **proven** needs of the **immediate** local residential community **and can provide a strong rationale and evidence for depending upon the high level....”***. **Rationale:** As explained in 8.3 (a), above.

#### 8.4 I do NOT oppose

- (a) Objective 14.2.3, Policies 14.2.3.1 – 14.2.3.5 and 14.2.6.1 re MDRS, realising that these cover the legislated requirements.
- (b) Policy 14.2.11.1(b) re unhosted visitor accommodation, but am concerned that residential dwellings will be used for unhosted (commercial) purposes, with few restrictions. As written, it does not reflect the impact of unhosted on a neighbourhood as a whole, the effects of which are well documented.  
**Request:** Consider how to make the intention more explicit, i.e., to retain residential neighbourhoods as a place to live.

#### 8.5 I oppose the following:

- (a) Policy 14.2.7.3 Heights of 10-storeys surrounding the central city, if *“surrounding area”* refers to a 1.2km ‘walkable catchment’, on the grounds that 10-storeys is too high for the area north of the City Centre (see Part I of my submission).
- (b) Policy 14.2.7.6 (a) (i), requiring at least two-storey developments in HDRZs. This is inconsistent with Objective 14.2.1 of enabling a range of housing types. It also is not supported by data from the latest ‘Life in Christchurch’ survey.
- (c) Policy 14.2.7.6 (iii) re locating building bulk to the front of sites (*“enhancing the street wall”*). This was explained as improving *“greater connection with the street, ensuring that the rear of the site is retained for outdoor living opportunities”* (Mark Stevenson email, 28/2/23). What is the back of the building faces south? And how can the *“street frontage”* be used effectively for tree planting if buildings take up space that could augment that, as recommended in other parts of PC14?
- (d) Policy 14.2.9.2 (b) (i) enabling larger scale community activities and facilities *“within walking distance of the Central City...”* on the grounds that ‘walking distance’ probably refers to 1.2km from the edge of the City Centre. Enabling non-residential activities in what could cover most of the residential zones within the Four Avenues should be discouraged---not enabled.

#### Requests:

- (a) Clarify that *“surrounding area”* in 14.2.7.3 does not include the area north of Salisbury Street.
- (b) Delete 14.2.7.6 (a) (i) and (iii).
- (c) Amend 14.2.9.2 (b) (i) to only include the City Centre Commercial Business and Mixed Use Zones (as well as suburban commercial centres).

## 9 Chapter 14 Residential Rules: High Density Residential Zone (14.6)

### 9.1 I support the following provisions:

- (a) Permitted activity 14.6.1.1 P1 ‘no more than 3 residential units per site’ (although it seems misplaced?) and P6 and P7 (although all non-residential activities should be discouraged from vulnerable residential zones near the City Centre).
- (b) Permitted activity P12 and 13 re hosted visitor accommodation.
- (c) RD2 re four or more units.
- (d) C1 and C2 re unhosted visitor accommodation.
- (e) Built form standard 14.6.2.7 re tree canopy (see detailed response under Chapter 6, Tree Canopy Cover).
- (f) Built form standard 14.6.2.12 re maximum building coverage of 50% (60% in some circumstances).
- (g) Deletion of 14.6.2.12 (b) requiring one dwelling for every 200m<sup>2</sup>.

9.2 I **cannot find** a reference to the Permitted height for HDRZ, although the Interactive Map and associated zoning maps refer to 14m (four storeys) for all of the HDRZ north of Salisbury Street (presumably because it’s considered within a ‘walkable catchment’ of the City Centre—which my submission argues it is not).

9.3 However, I **could support**

- (a) Permitted height of 14m, to preserve the ‘cascade’ principle, but only with the current residential recession plane and
- (b) RD maximum height of 20m, also with the current residential recession plane.

The above provides for greater intensification, but buildings any taller than that would not meet the “benefits” of intensification or protect neighbours from significant negative effects.

9.4 I also **cannot find a rationale** for differences in maximum height on sites within the relatively small HDRZ from Salisbury Street to Bealey Avenue, between Colombo and Victoria Streets. Sites on some streets (or even one side of a street) are designated a ‘Precinct’, with a maximum consented height of 20m. Other sites have a maximum height of 32m. Oddly, the “lower” height covers sites facing busy streets such as Bealey Avenue, where taller buildings might be more easily accommodated. Some sites on the east side of Durham Street are within a ‘Precinct’, but those between Salisbury Street and the former women’s hospital site are not (making them more vulnerable to greater heights). It appears completely arbitrary and not very sensible.

**Request:** Review the associated Zoning Map to ensure “it takes into account how the package of zones work together” (‘Understanding and Implementing’ guide, Section 6, p28). Having so much variation in a small neighbourhood defined by four major streets, does not ‘work together’.

9.5 I **oppose:**

- (a) RD 14.6.1.3 RD7 and RD8 because the current recession plane is not identified.
- (b) RD8 also on the grounds that 20m should be the maximum height, at least from Salisbury Street to Bealey Avenue.
- (c) Standard 14.6.2.1 (b), restricting residential units to no less than 7m for Permitted and Restricted Discretionary activities. I may be interpreting this incorrectly, but oppose not allowing one-storey units in HDRZ, on the grounds that it compromises Objective 14.2.1. *See rationale below*
- (d) Standard 14.6.2.2 (b) for buildings over 12m (no recession plane)—the setbacks on their own are unlikely to provide access to sunlight and protect the effects of tall buildings on neighbours.

**Rationale:** The 2021 ‘Life in Christchurch’ survey focussed on housing in the Central City. Over half the respondents said there “should be a good supply of single-story [stand-alone] homes”, “designed to take advantage of the sun” (CCC Updated Housing Capacity Assessment, Section 1.5, Attachment A). Over half of the respondents to the 2022 follow-up survey would not consider living in the Central City because “housing does not meet their needs” (Section 4.6). The most important factors

for those who might consider shifting to the Central City were privacy, sunlight, natural light and outdoor living space, another reason to ensure adequate recession planes.

**Requests:**

- (a) Extend Permitted height of 14m, with current residential recession plane regardless of height, from Salisbury Street to Bealey Avenue (between Colombo and Victoria Streets).
- (b) Delete reference to 32m height as a RD activity in the same area as above.
- (c) Delete 14.6.2.1 (b).
- (d) Amend 14.6.2.2 (b) so that the current residential recession plane applies, regardless of height.

- 9.6 I **cannot find any provision re vehicle service bays**, especially for multi-unit developments. These developments—with no off-street parking—have caused problems for those living there, as well as for neighbours. Tradespeople, home help and (in one instance) emergency vehicles cannot pull in off the road, which is very tricky in central city residential areas where there usually are no available parks on the street during working hours. They double park (dangerous on narrow streets) or pull into neighbours' drives, if there is one. There also is no place for residents to charge e-vehicles.  
**Request:** Add a rule requiring at least one service bay for multi-unit developments of three or more units.

## 10 Chapter 14 Residential Rules—Matters of control and discretion (14.15)

### 10.1 I **support**

- 14.15.4 (height in relation to boundary breaches).
- 14.15.6 (a – c) re scale.
- 14.15.36 re urban design, especially acknowledging '*human scale*'.

### 10.2 I **do not oppose the following** (but have reservations):

- 14.15.5 (minimum unit size): Smaller units allowed under 14.6.2.16 are clearly intended for short term rentals, not living in, so should be discouraged.

- 10.3 I am **concerned about the implications of 14.15.30 (a – c)**: The proposed height in HDRZ (allowing 20 – 32m) is greater than required, so the four matters of control/discretion need to provide more protection from taller buildings.

- (a) Clause (a) will allow “height creep” and set precedents. Even one taller building would be used by the next applicant as a reason that another one should be approved. With only a few more, the ‘compatibility’ argument is lost.
- (b) Clause (b) ignores the effects of tall buildings on more than just the “neighbouring properties”—the impact would go much further.
- (c) Clause (c) is too open ended—“*the extent to which an increased height is necessary to enable more efficient, cost effective and/or practical use of the site*” is a catch-all that ignores what is effective/practical from residents' perspective. It could be used as the basis for almost any application.

**Request:** Consider ways to provide further protection from tall buildings in a residential neighbourhood, by rewriting and expanding the current list.

- 10.4 I **oppose in part** 14.15.31 (b) and 14.15.33 (d) that could allow reduced recession planes or setbacks to “*enable more efficient, cost effective and/or practical use*” of a site, without considering other effects. Recession planes and setbacks are the most effective ways to control the negative effects of height—they must be retained.

**Request:** Delete these clauses.



## 11 Tree Canopy Cover and Financial Contributions (Chapter 6)

### 11.1 References used:

- Section 32 Evaluation—Part 7: Tree Canopy Cover/Financial Contributions to Address the Effects of Development in Residential Areas on the Environment (Undated)
- Appendix 1: Urban trees and their ecosystem services report (J Morgenroth, University of Canterbury, 26 April 2022)
- Chapter 6—General Rules and Procedures (Notified version)
- Our Urban Forest Plan for Otautahi Christchurch (2023)
- Christchurch City Council Tree Policy (2020 – 2021)
- Silver Bullet or band aid? Perception of the impact of the Medium Density Residential Standards on the sense of neighbourhood and community in Christchurch (Megan Austin, Master of Planning dissertation, Lincoln University, 2022)

11.2 The importance of retaining and increasing tree canopy cover is emphasised in all the documents. The s32 Evaluation report acknowledges negative effects of intensification, e.g., increased carbon emissions, stormwater run-off and heat island effects; loss of tree biodiversity, amenity and tree canopy (the latter *“attributed to residential property redevelopment and intensification”*, p 2).

11.3 The report concludes *“With the enabling provision of the Medium Density Residential Standards and the likely increase in residential intensification, that canopy cover is under threat of further losses”* (para 6.1.3, p 47) and *“the risk of not acting is far greater than the risk of acting”* (section 5.4.6, p 45).

11.4 The proposed rules and standards are only a drop in the bucket of what should be done to reduce negative effects of this level of intensification. Within this context, I have summarised what I support, support in part, oppose and request.

11.5 I support the intention of the following (with some requested amendments):

- (a) Strategic Objection 3.3.10 (a) (ii) *E re tree canopy cover in residential activities*  
**Request:** Include commercial/industrial activities as well.
- (b) **6.10A and the Objectives/Policies** re Tree Canopy and Financial Contributions  
Objective 6.10A.2.1—Urban tree canopy cover. **Request:** Apply to commercial/industrial too.  
Policy 6.10A.2.1.1—Contribution tree canopy cover. **Request:** Increase cover in (i) to 25%.  
Policy 6.10A.2.1.2 and 2.1.3—Strongly support both as written.

11.6 I support in part 6.10A.4.1.1 Activity specific standards for (P1) and (P2), which require a minimum tree canopy cover for residential development in the Christchurch City area, provided

- (a) this means everywhere in Christchurch, including the Central City and High Density Residential Zones/Precincts, which is not clear;
- (b) the Standards are strengthened as requested below; and
- (c) the Matters of Discretion are applied through the lens of climate change and amenity.

**Requests:** (i) Increase the minimum cover from 20% to 25% and (ii) add a corresponding Standard for Commercial/Industrial Zones, with a minimum cover of 10%.

**Rationale:** Conclusions from the Lincoln University thesis (Megan Austin) were based on interviews with 16 representatives from relevant professions, a literature review and analysis of the first version of PC14. One of the emerging themes related to landscaping and trees: *“...although it was the common consensus that the requirement to provide 20% landscaping coverage was, for the most part, a positive standard that was intended to protect some level of amenity and character, there were critiques expressed surrounding how effective the 20% would be”* (p 45). The 20% coverage was

seen as minimal, but better than nothing (p 44). There was concern about the environmental implications of the level of intensification in Plan Change 14, including (i) insufficient space for trees to grow properly (ii) tall buildings causing shade and (iii) stormwater runoff.

The City Council's Urban Forest Plan confirmed the need to increase canopy cover "*throughout the district across all land use types*" to '*reduce air pollution, heat island effects, manage stormwater and support green corridors*' (Goal 1: Plant). A target was set for Commercial/Industrial and Residential.

11.7 I **support 6.10A.4.2.1 (a) and (b)** Tree canopy cover standards and calculations, with the following reservation about (a) (vii) and (viii):

- (a) **Re (vii):** There is nothing about how long retained or planted trees must stay in the ground, or whether "neglect" will be an acceptable excuse for removing them at a later time or how Council will monitor whether in fact the trees do remain. I have seen examples in my own neighbourhood of the few shrubs or small trees planted on new developments to meet requirements being ripped out or left to die, without any apparent consequences.

**Request:** Consider how to address this in the Plan Change.

- (b) **Re (viii):** Given that impact of intensification on water runoff, impervious (or even semi-impermeable surfaces such as artificial grass) should be discouraged.

I **could not find** a Rule restricting the use of impervious / impermeable surfaces on residential or commercial sites. Almost the new multi-unit developments in my neighbourhood have covered what little outdoor space there is with either concrete or artificial grass. There are alternatives available, and it's time to recognise the environmental impact and act!

**Requests:** (i) Decrease the maximum percentage in (viii) as much as possible and (ii) add a Rule to all relevant sections of the District Plan encouraging the use of permeable surfaces for drives, parking lots, residential and commercial sites.

11.8 I **strongly support Standard 6.10A.4.2.2** Financial contribution standards and calculations, but request they are strengthened. The Financial Contribution Calculator tool is very user-friendly, and the level of detail in 6.10A.4.2.1 and 4.2.2 does not leave much room for anyone to claim it is confusing or complicated.

- (a) The Financial Contribution per tree (a) (i) and (iii) may not be high enough—and is not inflation-proofed—to deter clearing a site and/or removing mature trees that could be incorporated into the design. The cost of removing or not replacing trees must affect the bottom line to the extent that it is financially more attractive to meet the Standard than make a financial contribution.
- (b) Trees should be treated as a valuable, vulnerable and unique resource, supported by strong and unequivocal rules and standards. The example of how the FC formula would work on a 1000m<sup>2</sup> site (s32 report, para 3.4.18) results in a FC of \$44,074. Even doubling the amount per tree (for a total of \$48,148) is unlikely to act as a deterrent for a development that size, according to two developers I asked. The total cost to developers needs to be increased.
- (c) None of the provisions explicitly state that the first priority is to maintain or plant trees on the same site, rather than use the FC as a way around it. Although it can be inferred, given the general agreement about the importance of trees, the preferred option needs to be emphasised.

**Requests:** (i) Rewrite 6.10A.4.2.2 (a) to read "*..If the tree canopy cover requirements... cannot be met* [rather than "*are not met*") to make it clearer that maintaining or planting on the same site is the first priority and (ii) increase the amount per tree from \$2037.00 to at least \$4074.

11.9 I **support 6.10A.5 Matters of Discretion**, as written, but with the following reservation re (iii) and (iv):

I am concerned about how many developers will claim either (iii) or (iv) as reasons why they cannot possibly retain or plant trees on site. In the case of tree canopy cover, there really is not a substitute and we are well past the time when anything related to climate change should be seen as minor or can be managed.

**Request:** Consider how to make the intention of the Matters of Discretion more explicit.

- 11.10 I **oppose** the decision to remove (from the draft proposal) the requirement for 10% tree canopy in commercial/industrial zones. Reasons given in the s32 report are that it would reduce the capacity of available industrial land (para 3.4.8); the PC is only concerned with adverse effects of residential development (para 3.4.11); that some think the cost of the land component of the FC in the Central City would be too high (para 3.4.9) and that it would conflict with commercial/industrial built form standards and being able to use impervious surfaces (para 3.4.11).

**Request** that 6.10A.2.1 include commercial/industrial developments and that the relevant Built Form Standards are revised so they are not an impediment.

#### **Rationale**

- (a) The arguments against including these zones are short-sighted and ignore the impact of loss of canopy cover on climate change and amenity;
- (b) Impervious surfaces should be kept to a minimum because of water run-off, so if additional changes are needed to the District Plan to cater for this, so be it;
- (c) The Red Zone may not continue to be available for extensive planting, plus canopy benefits are very localised and relatively small (the City Council data confirm if the entire Red Zone were planted to 80% coverage, it would add only 1.09% to the overall canopy, para 3.4.20); and
- (d) We need to maximise canopy cover, from whatever zones and sites we can.

The Morgenroth report (p 10) says that *“More trees or tree cover, with greater total biomass and wood density.... will lead to increased carbon storage / sequestration, greater stormwater runoff attenuation, and improved urban heat island mitigation. Threats to these regulation services included development intensity and impermeable surfaces (buildings and/or pavements), both of which have been shown to be associated with lower tree cover.”*

## **12 Entertainment and Hospitality**

- 12.1 I **oppose** 15.2.6.7 (a) (ii) re *‘the viability of existing entertainment and hospitality investment, particularly that investment which has occurred in the Central City since the Canterbury earthquakes’*.
- 12.2 This policy was added during the District Plan Review and was subject to discussion between the Victoria Neighbourhood Association, the CCC and hospitality representatives. The VNA opposed it, on the grounds that many people’s investments were compromised by the earthquakes—not just the hospitality sector—including owners of residential properties. We also knew that the primary reason the sector requested this policy was because of the (then current) decisions being made on the Local Alcohol Policy. Agreement had been reached between the VNA, CCC, the Police and Medical Officer of Health that trading on Victoria Street should be no later than 1:00am. They were opposing that.
- 12.3 It’s now 12 years since the earthquakes. Protecting the viability of entertainment and hospitality investments is long past any reasonable timeframe. I also note that there is no timeframe signalled in this policy. For how many more years was this policy supposed to apply?

**Request:** Delete 15.2.6.7 (a) (ii).

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

## Submitter Details

**Submission Date:** 07/05/2023

**First name:** Prue **Last name:** Manji

**Preferred method of contact** Email

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** pruemanji@hotmail.com

**Daytime Phone:** 274555178

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

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

Note to person making submission:

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

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 38.1

- Support
- Oppose
- Seek Amendment

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

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

My address is 11 Watford Street, Strowan. I'm particularly concerned about the streets going back one block from Normans Road, which are heavily impacted by parking from St. Andrew's College students and parents.

The streets most impacted are: Watford Street, College Avenue, Uranga Avenue and Brenchley Avenue.

i propose that the streets in these blocks remain low density to ensure the safety of the current residents and school students, by limiting the potential for a traffic and parking crisis to eventuate.

**My submission is that**

The high and medium density housing changes will create large scale problems in my area, Strowan, which is already struggling with limited parking due to St. Andrews College students parking in the surrounding streets, as well as morning and afternoon congestion with school drop-offs. The area can barely cope with the parking situation at the moment, but to add housing that could create the possibility of from 12 up to 24 cars coming from MDH and HDH on a section which currently holds one house with mostly two cars, contained off the road, is going to strain the capacity of the area to assimilate this quantity of extra vehicles.

I'm also concerned about increased flooding. The intersection of Brenchley and Watford Street regularly floods at the moment. With the reduction of soft surfaces and the increase in hard surfaces, this situation will be exacerbated.

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Attached Documents

File
No records to display.

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

## Submitter Details

**Submission Date:** 07/05/2023

**First name:** Andrea **Last name:** Floyd

**Preferred method of contact** Email

**Postal address:** 49A Lonsdale Street

**Suburb:** New Brighton

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8083

**Email:** andyfloyd65@yahoo.com

**Daytime Phone:** 0212096672

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

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

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 39.1

- Support
- Oppose
- Seek Amendment

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

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

i would like a limit of how high units can go in the suburbs-2 stories is enough or maybe 3 in certain cases when they dont interfere with the surrounding houses. Onsite parking needs to be included in the developers plans. And neighbours should be consulted when multi story units are going in next to them. And multi townhouse developments shouldnt be allowed in areas that dont have the facilities to cope with extra people.

**My submission is that**

i understand more housing is needed but not 3 or more storied townhouses in the suburbs. People live in the suburbs to have a bit of a garden, good sunlight and privacy all of which will/can be lost if multistoried townhouses are built next door. In Brighton we don't even have school, getting an appointment at the medical centre is a mission and a long wait and yet more townhouses are being built. And as we suffer from a lack of good shops in Brighton most owners/renters will have at least one car which ends up parked on the street as most units have no onsite parking (burglars paradise). Not sure why no onsite parking is even allowed. Brighton and other suburbs are not the place for multistory flats - in the city centre and some other areas are which have the facilities to cope with them. are a much better option. And I think it's so wrong that a homeowner can suddenly lose their sunlight because of a new built next door. I bought my small house because it gets all day sun and presume you wouldn't be paying the increase in power needed to heat the house if I lost it

---

#### Attached Documents

File
No records to display.

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

## Submitter Details

**Submission Date:** 07/05/2023

**First name:** Ruth **Last name:** Dyson

**Preferred method of contact** Email

**Postal address:** 31 Moncks Spur Road

**Suburb:** Redcliffs

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8081

**Email:** ruth.dyson@xtra.co.nz

**Daytime Phone:** +64274461674

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 40.1

- 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***

All homes in the Port Hills which have had rockfall protection structures erected. There should be an additional overlay in the District Plan identifying that even though these homes are in a rockfall risk area, that these specific homes have rockfall protection structures in place.

**My submission is that**

To Christchurch City Council from Hon Ruth Dyson ruth.dyson@xtra.co.nz

Plan change submission

May 2023

My submission addresses a current shortcoming in the District Plan and your current Proposed Housing and Business Choice Plan (PC14) gives Council the opportunity to address this issue.

My submission is that the sentence in Point 7 of Clause 5.6.1.2 of the District Plan should be removed. The sentence reads 'The calculation shall not take account of hazard mitigation works'. The calculation referred to is for determining risk (AIFR) from rockfall and cliff collapse. The full section is attached to this submission.

Some of you were around the Council table when the Council agreed to fund rockfall protection structures for the Port Hills residents who wanted to stay in their homes. The alternative for the homeowners was to accept the Government 'red-zone' offer and leave their home knowing that it would be demolished. Some wanted to protect their home from future rockfall risk with a protection structure chose this option. The Council made the decision to fund these structures on the basis of using the 50% of the 'red-zone' offer which the Council was funding. So the same ratepayer funding was being used, but for a different purpose i.e. paying to protect homes rather than buying the property through the 'red-zone' offer and demolishing the home.

Getting rockfall protection structures designed, approved and peer reviewed by Geotech engineers, contracted with and approved by Council, consented, constructed and signed off when completed was not an easy task. For those who wanted to stay living in their homes safely, it was worth it.

The design of the rockfall protection structure is required to make the home safe from rockfall risk. It is designed and signed off for that exact reason. The Council agreed to use ratepayer funding to make these homes safe. The contract between the homeowner(s) and the Council requires the homeowner(s) to maintain the integrity of the structure.

Despite those facts, the District Plan requires discounting of the mitigation — as if the rockfall protection structures either don't exist or don't do their job!

When I queried staff as to the reason for this sentence, they said that the same applied to the flooding areas which have been mitigated. This ignoring of mitigation is also illogical. So illogicality in one part of the plan means it should be duplicated in another part!

The impact for homeowners can be significant in terms of the value of their property and saleability and therefore future options for them. It has a major impact in terms of insurability which can leave homeowners vulnerable in the case of future events. It is unfair on homeowners because it denies the fact that their home is now safe from rockfall risk.

So the simple solution is to have a new overlay which acknowledges that the home is within a rockfall risk area BUT that it has had the risk for that particular home mitigated. Full and truthful information. It is a very simple and tidy solution and Council staff already have the information in regard to the particular homeowners on file so it would require very little work. A simple fix to a very big issue for a small (but important!) local residents.

I am happy to speak to my submission and/or answer any questions from Councillors and thank you for your time.

The Christchurch District Plan

## 5.6.1.2 Exceptions to Rule 5.6.1.1 - AIFR Certificate

a. The Council will issue an AFR Certificate (which will be valid for 2 years from the date of issue) which specifies the calculated AIFR from i. and ii. below for an identified area of land in Rockfall Management Area 1, Rockfall Management Area 2 and/or Cliff Collapse Management Area 2 only, when the following procedure is undertaken and the requirements of the procedure are satisfied:

- i. The Council has received a report, in respect of an identified area of land, prepared by a Chartered Professional Engineer with requisite experience in geotechnical engineering or a Professional Engineering Geologist (IPENZ registered), which calculates the AIFR from rockfall and/or cliff collapse for the identified land in the following manner.

- Alf the land is in Rockfall Management Area 1:

Apply the method for assessing the risk as set out in the GNS Science Consultancy Report

2011/311 Port Hills Slope Stability: Pilot Study for assessing life-safety risk from rockfalls (boulder rolls), and any subsequent updates to this report by GNS Science, using the parameters listed in the Table in Policy 5.2.2.4.1 .a. for Rockfall Management Area 1 along with any relevant site-specific information, and other parameters in the GNS Science report (calculation 1(a)).

II. If the risk (BIFR) resulting from calculation I(a) is less than that shown in the Table in Policy

5.2.2.4.1.a for Rockfall Management Area 1 (210-4), then using the same method set out in the GNS Science Consultancy Report 2011/311 Port Hills Slope Stability: Pilot Study for assessing life-safety risk from rockfalls (boulder rolls), and any subsequent updates to this report by GNS Science, calculate the AIFR using the parameters listed in the Table in Policy 5.2.2.4.1 .a for Rockfall Management Area 2 along with all relevant site-specific information, and other parameters listed in the GNS Science report (calculation 1

- BIf the land is in Rockfall Management Area 2:

- İ. Apply the method for assessing the risk as set out in the GNS Science Consultancy Report

2011/311 Port Hills Slope Stability: Pilot Study for assessing life-safety risk from rockfalls (boulder rolls), and any subsequent updates to this report by GNS Science, using the parameters listed in the Table in Policy 5.2.2.4.1 .a. for Rockfall Management Area 2 along with all relevant site-specific information, and other parameters in the GNS Science report (calculation 2(a)).

- Clf the land is in Cliff Collapse Management Area 2:

- İ. Apply the method for assessing the risk as set out in the GNS Science Consultancy Reports 2012/57 Pott Hills Slope Stability: Pilot Study for assessing life-safety risk from cliff collapse and 2012/124 Port Hills Slope Stability: Life-safety risk from cliff collapse in the Pott Hills, and any subsequent updates to those reports by GNS Science, using the parameters listed in the Table in Policy 5.2.2.4.1 for Cliff Collapse Management Area 2 along with all relevant sitespecific information, and other parameters in the GNS Science Consultancy Reports (calculation 3(a)).

AND

- ii. The Council has commissioned and received a peer review report from a Chartered Professional Engineer with requisite experience in geotechnical engineering or a Professional Engineering Geologist (IPENZ registered)\*\*\*, which concurs with the application of the method required in i. above, and with the calculated AIFR(s) for the

identified land.

Christchurch

Christchurch

District Plan City Council

The Christchurch District Plan

\*\*The peer reviewer must not, at the time of undertaking the review, be employed by either: a) the same company as the company that authored the report received in i. above, or b) the Council..

b. Where a valid AIFR Certificate has been issued by the Council for an identified area of land, in accordance with the

procedure described in Rule 5.6.1.2a. above, the activity status (for activities listed in Table 5.6.1.1 a) that applies to that land shall be that which applies to the Slope Instability Management Area specified in Table 5.6.1.2a. below. An AIFR Certificate is valid for 2 years from the date of issue. If the activity is commenced (in the case of a permitted activity) or a resource consent application is lodged within 2 years from the date of issue of the AIFR Certificate, no further Certificate is required after the 2 year term expires.

7 The calculation shall not take account of hazard mitigation works.

Table 5.6.1.2a

Slope instability hazard management area applying to the land on the planning maps	FR as specified in the site-specific FR Certificate	Slope Instability Management Area for the purpose of determining activity status for activities on the land (Table 5.6.1.1a)
Rockfall Management Area 1	Result of calculation 1 (a)	10—4 Rockfall Management Area 1
	Result of calculation 1 (b) where required	10—4 Rockfall Management Area 2 Remainder of Port Hills and Banks Peninsula
Rockfall Management Area 2	Result of calculation 2(a)	Rockfall Management Area 2
		10—4 Remainder of Port Hills and Banks Peninsula
Cliff Collapse Management Area 2	Result of calculation 3(a)	10—4 Cliff Collapse Management Area 2

		10-4	remainder of Port Hills and Banks Peninsula
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Advice note:

1. Calculated AIFRs specified in issued, valid AIFR Certificates for identified areas of land, and valid certificates themselves, will be made freely available to the public, recorded in the Council's Geographical Information System and provided in

Land Information Memoranda.

2. Changes to the District Plan will be regularly notified, as required, to change the planning maps, in order to reflect

updated information regarding life-safety risk from rockfall and/or cliff collapse from issued AIFR Certificates.

Printed: 8 / 3 / 2022 Page 2 of 2

Christchurch

Christchurch

District Plan City Council

Attached Documents

File
No records to display.

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

## Submitter Details

**Submission Date:** 07/05/2023

**First name:** Susanne **Last name:** Schade

**Preferred method of contact** Email

**Postal address:** 4 Scott Street

**Suburb:** Sydenham

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8023

**Email:** info@architecta.co.nz

**Daytime Phone:** 0212634310

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:

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 41.1

- Support
- Oppose
- Seek Amendment

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

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

I seek council to apply the Qualifying Matter Residential Character Area to Scott Street in Sydenham

**My submission is that**

council applies Qualifying Matter Residential Character Area to Scott Street in Sydenham

---

Attached Documents

File
SUBMISSION SCOTT STREET SYDENHAM

SUBMISSION TO PROPOSED PLAN CHANGE PC14  
for Scott Street in Sydenham

SUBMISSION  
TO PROPOSED DISTRICT PLAN CHANGE PC14

for  
Scott Street, Sydenham

Qualifying Matter  
Residential Character Area

submitted by

Susanne Schade, 4 Scott Street, Sydenham, Christchurch

cellphone: 021 263 43 10      email: [info@architecta.co.nz](mailto:info@architecta.co.nz)

# SUBMISSION TO PROPOSED PLAN CHANGE PC14 for Scott Street in Sydenham

## CONTENT

Introduction	pg 3
Aerial view of Scott Street	pg 4
Photos of all Scott Street Homes	pg 5
Evaluation of Scott Street Homes	pg 15
Effects on Scott Street caused by MDRS	pg 17
Character Areas Matters	pg 22
What Scott Street residents have to say	pg 24
History of Scott Street	pg 27

Appendix A: Current ratio dwelling / site

Appendix B: Signatures of submission supporters



## SUBMISSION TO PROPOSED PLAN CHANGE PC14 for Scott Street in Sydenham

### INTRODUCTION

Scott Street is a small and narrow street in Sydenham with a number of worker style cottages from the early settlement days.

Newer built houses have incorporated those cottage style design features to maintain the visual coherence and to retain the integrity of the street.

Most houses in Scott Street are of a similar scale and form, including roof forms, showing similar architectural detailing, like verandas, entry doors facing the street and similar exterior wall cladding materials such as weatherboards and render. Most of the houses have front yards with plants and trees and often low fences to allow passers-by to enjoy the gardens and to interact with the residents of Scott Street.

The following aerial view shows Scott Street from above. Scott Street is aligned north to south, the north end starting at Brougham Street, the south end finishing at Burns Street.

There are 31 properties on Scott Street, most of them showing features of the Workers' cottage design style. Photos of each house on Scott Street have been taken to illustrate the unique residential character of this area.

For Scott Street the Medium-Density Residential Standards MDRS apply, which allow development of up to three homes of up to 12m in height on a single property without Resource Consent. Although densification is in general a good idea and necessary to provide housing for everyone, not all areas in a city are suitable for densification.

For those areas the extent of MDRS can be limited by implementing Qualifying Matters.

I, Susanne Schade, am seeking with this submission council to apply the Qualifying Matter "Residential Character Area" for Scott Street.

Concerns and reasons for this submission have been listed at the end of this document.



Susanne Schade, 4 Scott Street, Sydenham, Christchurch

Submitter, dated 07-05-2023

SUBMISSION TO PROPOSED PLAN CHANGE PC14  
for Scott Street in Sydenham

AERIAL VIEW OF SCOTT STREET



<u>Address</u>	<u>character features</u>
1 Scott Street	yes
2 Scott Street	yes, back section
3 Scott Street	yes
4 Scott Street	yes
6 Scott Street	yes
7 Scott Street	yes
9 Scott Street	yes
10 Scott Street	yes
11 Scott Street	yes
13 Scott Street	yes
14 Scott Street	yes
16 Scott Street	yes
17 Scott Street	yes
18/20 Scott Street	Nazareth House units
21 Scott Street	yes
22 Scott Street	yes
23a Scott Street	yes
24 Scott Street	yes
25 Scott Street	yes
26 Scott Street	yes
28 Scott Street	yes
29 Scott Street	yes
30 Scott Street	yes
31 Scott Street	yes
34 Scott Street	yes
35 Scott Street	no, new townhouses
36 Scott Street	yes
39B Scott Street	yes
40+ 42 Scott Street	yes

SUBMISSION TO PROPOSED PLAN CHANGE PC14  
for Scott Street in Sydenham



**1 Scott Street**

**Classification system as per  
Boffa Miskell Ltd :**

**Contributory**



**2 Scott Street,**

Located at the back of 4 Scott  
Street, not visible from the  
street

**Classification system as per  
Boffa Miskell Ltd :**

**Neutral**



**3 Scott Street**

**Classification system as per  
Boffa Miskell Ltd :**

**Primary**

SUBMISSION TO PROPOSED PLAN CHANGE PC14  
for Scott Street in Sydenham



**4 Scott Street**

**Classification system as per  
Boffa Miskell Ltd :**

**Contributory**



**6 Scott Street**

**Classification system as per  
Boffa Miskell Ltd :**

**Primary**



**7 Scott Street**

Worker style cottage behind  
the trees

**Classification system as per  
Boffa Miskell Ltd :**

**Primary**

SUBMISSION TO PROPOSED PLAN CHANGE PC14  
for Scott Street in Sydenham



**9 Scott Street**

**Classification system as per  
Boffa Miskell Ltd :**

**Primary**



**10 Scott Street**

**Classification system as per  
Boffa Miskell Ltd :**

**Primary**



**11 Scott Street**

**Classification system as per  
Boffa Miskell Ltd :**

**Primary**

SUBMISSION TO PROPOSED PLAN CHANGE PC14  
for Scott Street in Sydenham



**13 Scott Street**

**Classification system as per  
Boffa Miskell Ltd :**

**Primary**



**14 Scott Street**

**Classification system as per  
Boffa Miskell Ltd :**

**Neutral**



**16 Scott Street**

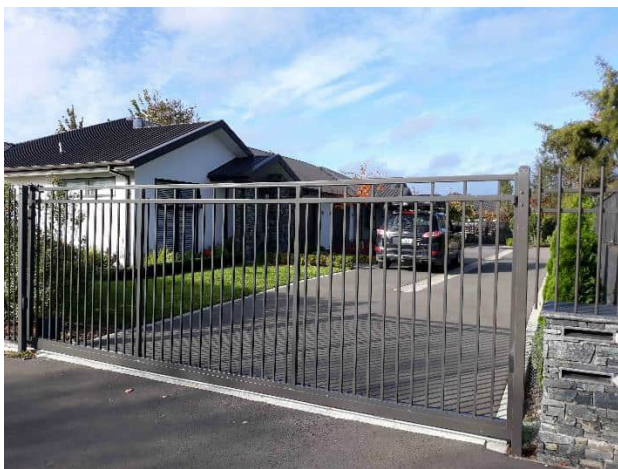
**Classification system as per  
Boffa Miskell Ltd :**

**Primary**

SUBMISSION TO PROPOSED PLAN CHANGE PC14  
for Scott Street in Sydenham



**17 Scott Street**  
**Classification system as per Boffa Miskell Ltd :**  
**Contributory**



**18 + 20 Scott Street**  
Nazareth House units  
**Classification system as per Boffa Miskell Ltd :**  
**Neutral**



**21 Scott Street**  
**Classification system as per Boffa Miskell Ltd :**  
**Primary**

SUBMISSION TO PROPOSED PLAN CHANGE PC14  
for Scott Street in Sydenham



**22 Scott Street**

**Classification system as per  
Boffa Miskell Ltd :**

**Primary**



**23 Scott Street**

**Classification system as per  
Boffa Miskell Ltd :**

**Neutral**



**24 Scott Street**

**Classification system as per  
Boffa Miskell Ltd :**

**Primary**



SUBMISSION TO PROPOSED PLAN CHANGE PC14  
for Scott Street in Sydenham



**25 Scott Street**

**Classification system as per  
Boffa Miskell Ltd :**

**Neutral**



**26 Scott Street**

**Classification system as per  
Boffa Miskell Ltd :**

**Primary**



**28 Scott Street**

**Classification system as per  
Boffa Miskell Ltd :**

**Neutral**

SUBMISSION TO PROPOSED PLAN CHANGE PC14  
for Scott Street in Sydenham



**29 Scott Street**

**soon to be demolished**



**29 Scott Street**

For Sale sign in front of 29  
Scott Street for four units,  
2-storey

Mike Pero advertises this  
property as nestled amongst  
historic workers cottages but  
at the same time the  
development shows none of  
the design features of the  
workers cottages.

SUBMISSION TO PROPOSED PLAN CHANGE PC14  
for Scott Street in Sydenham



**30 Scott Street**

**Classification system as per  
Boffa Miskell Ltd :**

**Contributory**



**31 Scott Street**

**Classification system as per  
Boffa Miskell Ltd :**

**Contributory**



**34 Scott Street**

**Classification system as per  
Boffa Miskell Ltd :**

**Contributory**

SUBMISSION TO PROPOSED PLAN CHANGE PC14  
for Scott Street in Sydenham



**35 Scott Street**

New townhouses,  
currently under construction

**Classification system as per  
Boffa Miskell Ltd :**

**Intrusive**



**36 Scott Street**

**Classification system as per  
Boffa Miskell Ltd :**

**Contributory**



**39 Scott Street**

**Classification system as per  
Boffa Miskell Ltd :**

**Primary**

## SUBMISSION TO PROPOSED PLAN CHANGE PC14 for Scott Street in Sydenham



**40 + 42 Scott Street**

(# 42 in the back)

**Classification system as per  
Boffa Miskell Ltd :**

**Primary**

### Note:

All photos have been taken in April 2023.

### EVALUATION OF SCOTT STREET HOMES:

Out of 31 properties at Scott Street at least 28 of them feature similar architectural character detailing. 28 properties account for appr. 90% of all properties.

The last review of the Qualifying Matter “Residential Character Area” in 2015 identified areas as Character Areas where at least 80% of the properties in the area contributed to the character values that made it special.

Scott Street exceeds the threshold of 80%.

Character features being:

- max. 2 storey
- gable end roof shape and change of roof pitch over veranda or back part of dwelling
- porches / verandas
- weatherboard or render wall cladding
- road facing entrance doors with veranda roofs or small entrance canopies above
- front yards with planting and trees

Boffa Miskell Ltd was engaged by council in 2022 to review Character Areas as Qualifying Matters.

Quoting the document “CCC-Technical Analysis of Proposed Character Area Provisions – January 2023” the submitter believes that Scott Street shows important Character Values as per quote below:

Many features, places, areas and landscapes are important to the District for their natural and cultural values. These special places contribute to the District’s identity, sense of place and social and cultural well-being. The Character Areas are residential neighbourhoods that are distinctive from their wider surroundings and are considered to have a character, in the

## SUBMISSION TO PROPOSED PLAN CHANGE PC14 for Scott Street in Sydenham

whole, worthy of retention that contribute to tūrangawaewae (a sense of place of and belonging), city, neighbourhood and personal identity.

The submitter supported by the residents of Scott Street believes that Scott Street is distinctive from its wider surrounding and can be considered to have character worthy of retention.

According to the Technical Analysis Boffa Miskell Ltd applied a classification system to each site. The site classification as per Boffa Miskell :

1. Primary – Sites with buildings, structures, landscape, garden and other features that define the character of an area;
2. Contributory – Sites with buildings, structures, landscape, garden and other features that support the character of an area;
3. Neutral – Sites with buildings, structures, landscape, garden and other features that neither defines, supports or detracts from the character of an area; and
4. Intrusive – Sites with buildings, structures, landscape, garden and other features that conflict/ detract from the character of an area.

The submitter applied the above explained classification system to each site as shown on the photo list (page 5 – 15). The classification of each site represents the opinion of the submitter only and it is not the intention of the submitter to evaluate any property. The classification shown is only for one purpose, to demonstrate how many properties on Scott Street contribute in the Submitter's opinion to the distinctive character of Scott Street.

## SUBMISSION TO PROPOSED PLAN CHANGE PC14 for Scott Street in Sydenham

### EFFECTS ON SCOTT STREET BY MDRS

#### **A. Stormwater**

Medium density accommodation as defined in MDRS will put additional strain to the existing storm water system. We already have experienced flooding at the corner Scott Street / Burns Street and corner Scott Street / Deyell Crescent during heavy rain fall due to the stormwater gullies getting blocked with debris.

Medium density also means less green outdoor space, hence fewer areas where rain water can drain away naturally.

With less outdoor space there will be fewer trees and vegetation, which reduces the natural capacity of the ground to absorb rainwater. Financial contributions won't be a sufficient compensation for Nature's capability to deal with heavy rain fall. Although the amount of financial distribution seems to be set quite high, for a developer it won't present a high obstacle.

#### **B. Sewer**

There is also concern regarding the sewer system. Information about the sewer system obtained from the council drainage plan shows a 225 mm diameter sewer pipe in the centre of Scott Street. The concern is that the current sewer system might not be able to accommodate a higher density in the future.

#### **C. Parking**

Currently most sites have off street parking available. Nonetheless a lot of cars are parked on the street and halfway on the footpath to allow for through traffic. Parking on the footpath restricts safe space for pedestrians. Scott Street is located adjacent to Nazareth House, a retirement village and rest home. Many residents at Nazareth House walk through Scott Street for their daily exercise as Scott Street and the adjoining streets provide a safe and quiet environment. With cars parking on the foot path elderly people have already trouble to find enough space to pass them with their walkers. This situation will only get worse with MDRS rules applying to Scott Street.

#### **D. Rubbish collection**

Car parking is already a major impediment for rubbish collection. A higher accommodation density will result in higher numbers of cars parking on the street. Not only cars of residents but also the additional cars of visitors.

Modern townhouses often provide only single garages or one off-street parking space per unit if any at all and not enough internal storage space. Occupants often use the garage space for storage to make up for the insufficient storage space internally provided. This results in using the street for parking instead of parking their cars in the garage or off street. Parking on both sides of the street as often seen in Scott Street allows for very limited space for bigger trucks used for rubbish collection.

#### **E. Emergency services**

On several occasions the fire engine wasn't able to get through Scott Street to attend to an emergency due to restricted passage width caused by cars parked on the street. Higher accommodation density will make this hazardous situation even worse.

#### **F. Site coverage**

Site coverage under MRDS is limited to max. 50%. The current site coverage in Scott Street is much less than 50%, it currently is including accessory buildings appr. 32%. Please refer to Appendix A.

## SUBMISSION TO PROPOSED PLAN CHANGE PC14 for Scott Street in Sydenham

The current site coverage provides not only more space for vegetation, it also provides a sense of openness and spaciousness, which is highly appreciated by the residents. The front yards seen so many times in Scott Street allow the residents to interconnect with people in the street and allows for a sense of belonging.

New developments like the one being built at 35 Scott Street are built close to the footpath with no front yard. This reduction in the front yard set back interrupts the continuity of the common setbacks along the street and increases the visual dominance of the development in a negative way.

More of these kinds of developments will cause a loss of the coherence and consistency in built character elements prominent in Scott Street so far.

### **G. Sun angle**

To demonstrate the impact of 12 m high buildings in a narrow street like Scott Street in regards to daylight access, the Submitter has provided images showing the shadow cast at three different daytimes on 22<sup>nd</sup> June (Winter solstice).

A fictional mix of 12m high buildings, single storey cottages and 2.5 storey high buildings have been chosen for this demonstration.

The first two images (3D model and birds view) show the cast shadow at 9 am on 22<sup>nd</sup> June. 12 m high buildings on the east side will overshadow cottages located on the west side, the whole street will lie in the shade of the tall buildings. Even 2.5 storey high buildings will cast shadow onto buildings on the opposite side.

The next two images show the shading an hour later at 10 am. The 12 m high buildings and the 2.5 storey high buildings still overshadow buildings on the opposite side. Most of the street is still lying in the shade at this time of the day.

The last two images show the cast shadow at 11 am. Houses located south of a 12 m high building will still be overshadowed by the tall building. The image shows that actually at least three sites south of a 12 m high building will be affected.

Only for a short period over midday will the street itself have some sun. Then the whole impact of 12 m high buildings will be reversed for the east side of Scott Street.

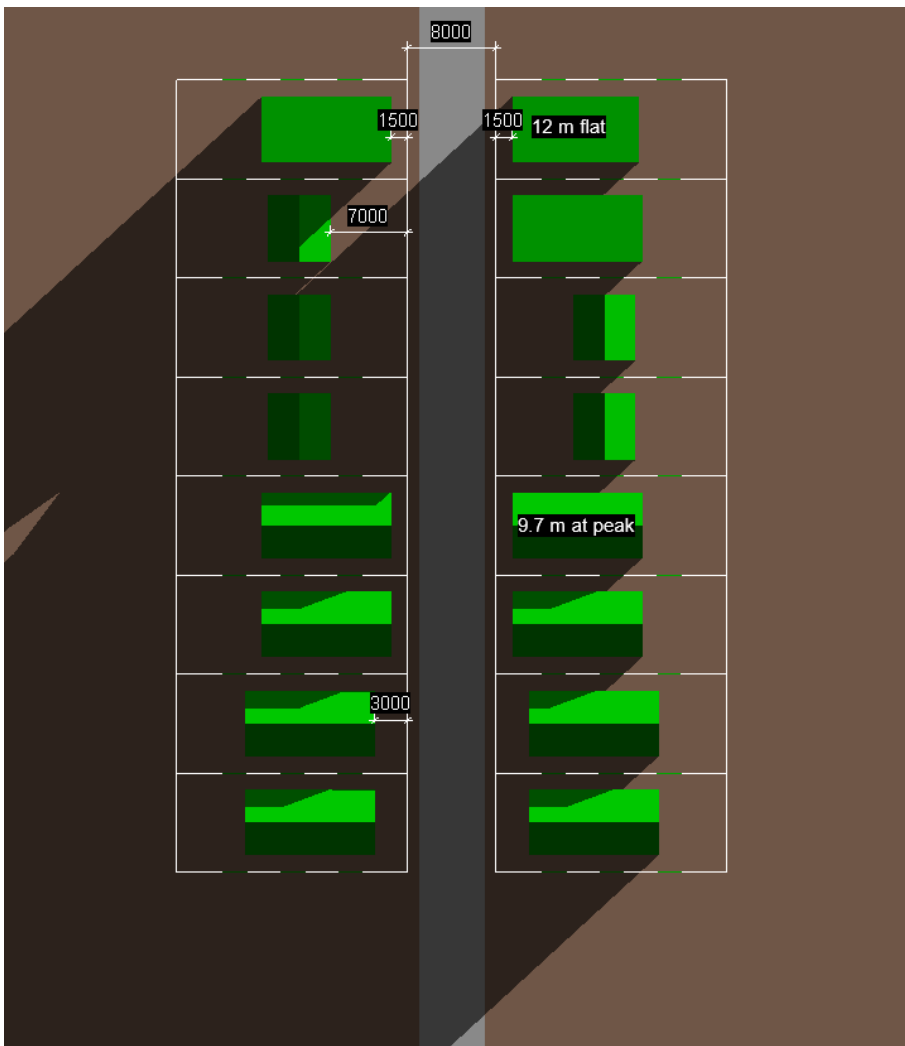
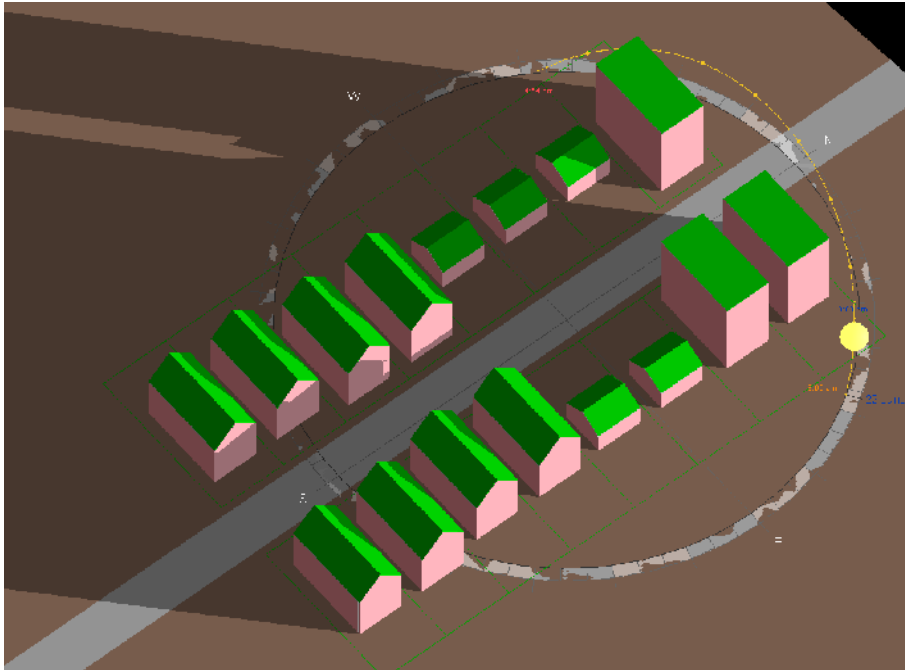
The images prove that during the winter months Scott Street could become a dark and unsafe street if MDRS apply without Qualifying Matter Residential Character Area.

Walking the street will be an oppressive experience, very different to the experience one can have now.



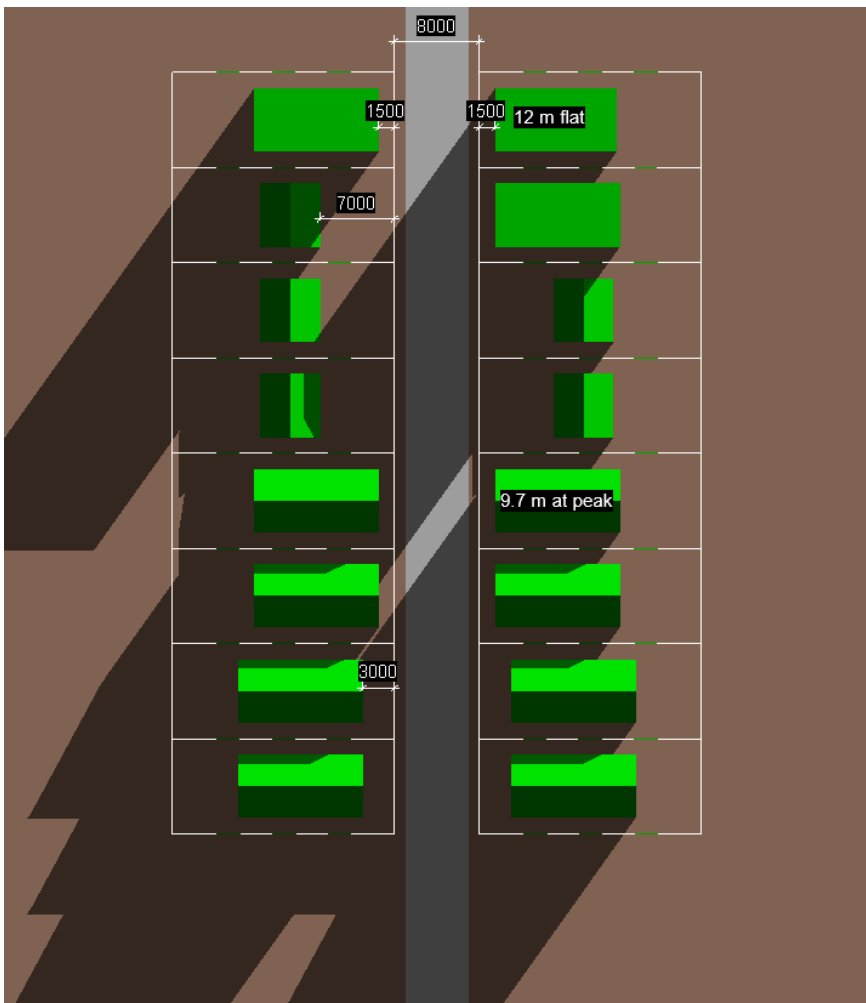
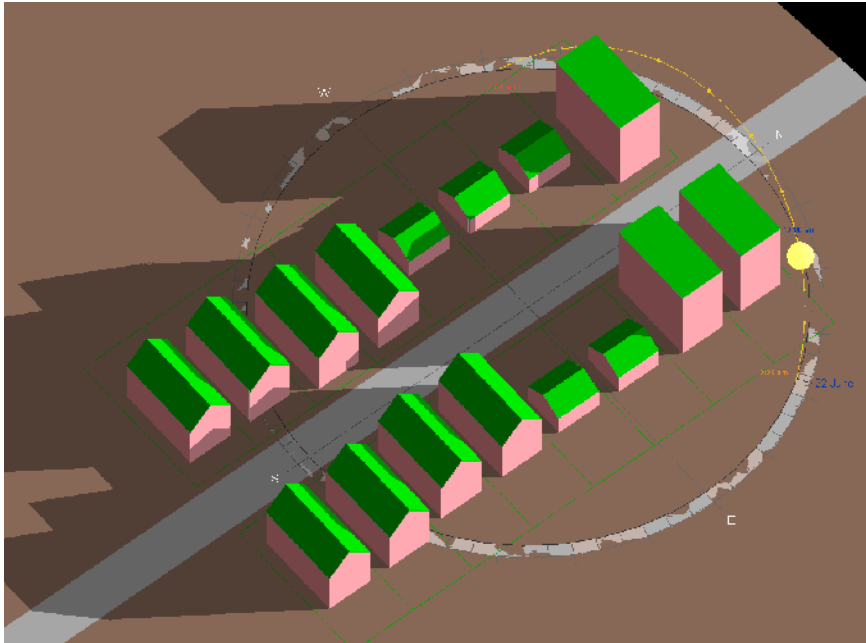
# SUBMISSION TO PROPOSED PLAN CHANGE PC14 for Scott Street in Sydenham

## SHADED SCOTT STREET at 9 am on 22<sup>nd</sup> June



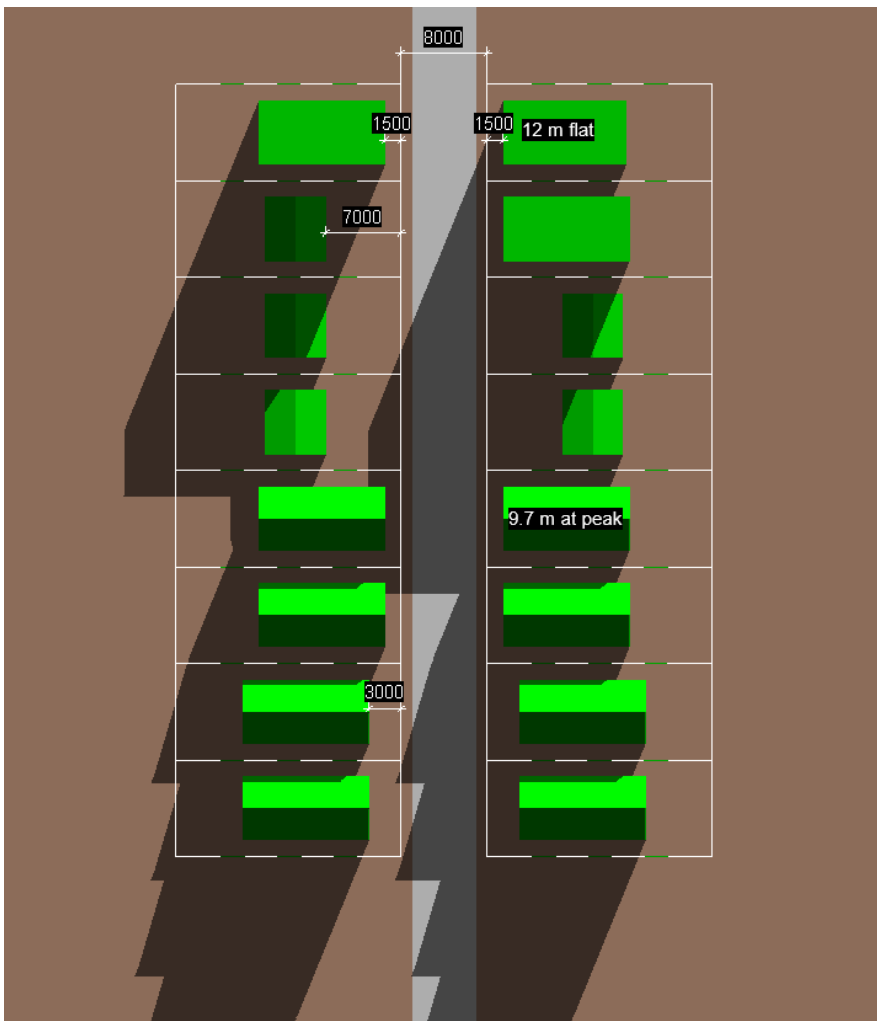
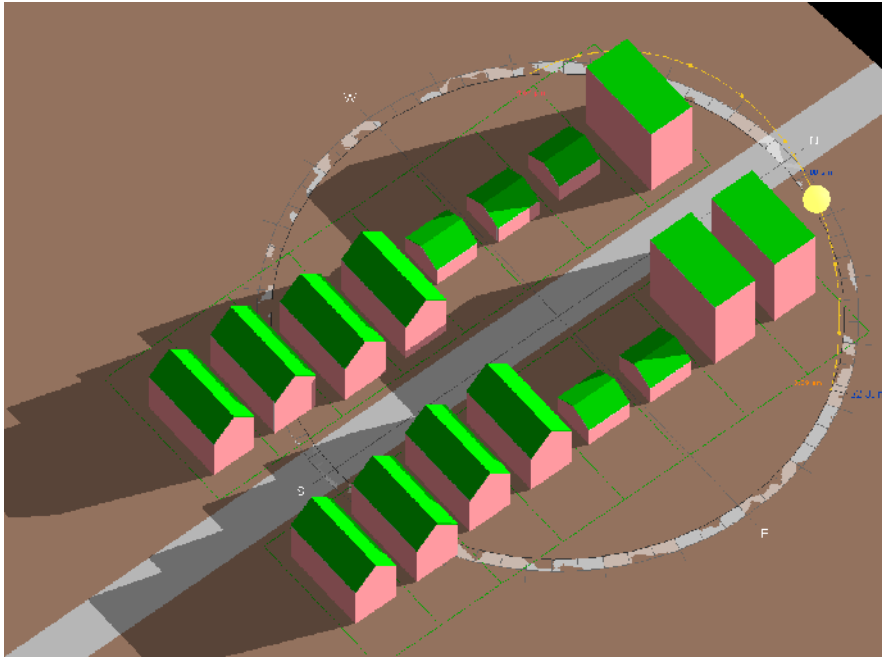
# SUBMISSION TO PROPOSED PLAN CHANGE PC14 for Scott Street in Sydenham

## SHADED SCOTT STREET at 10 am on 22<sup>nd</sup> June



# SUBMISSION TO PROPOSED PLAN CHANGE PC14 for Scott Street in Sydenham

## SHADED SCOTT STREET at 11 am on 22<sup>nd</sup> June



## SUBMISSION TO PROPOSED PLAN CHANGE PC14 for Scott Street in Sydenham

### CHARACTER AREA MATTERS

#### **A. Area Context**

Most of the homes in Scott Street are of a smaller scale and form, they are mainly one-storey high, a few are two-storey. They have front yards which provides connection to the street and makes the street more open and the houses not only unobtrusive but also pleasant to look at.

The exterior façades of Scott Street dwellings consist mainly of weatherboards or render.

MDRS allow for up to three homes of up to 12m height per site without Resource Consent. Minimum building setback from the road is 1.5 m.

This kind of scale will dwarf the existing houses and will completely compromise the current residential and heritage character of the street.

The development at 35 Scott Street for example does not show any consideration of the prominent exterior building materials used in Scott Street. The wall cladding of the new development consists of brick veneer on ground level and long-run metal cladding at the first floor level. The set back from the road is minimal and can't be considered as a front yard. This development is not coherent with the character of the street, it is rather a dominant and incongruous building form.

If more of these insensitive developments are being built Scott Street will lose its unique character and Christchurch will lose an important part of its history.

#### **B. Site Character and Street Interface**

Currently most homes are set back from the road providing space for vegetation and connection to people walking through the street. The new development at 35 Scott Street does not show any of the so significant and unique architectural design features, which are common for the houses at Scott Street.

The new development of four townhouses has no set back from the street, has no road facing entry doors, has no front yard to connect with the public. On the contrary 35 Scott Street has only three windows facing the street with one small window at ground level. Orientation of the building facing the street is not provided at all. This new development is the opposite of the existing character and is a visual disturbance.

Although it is too late to prevent developments like the one at 35 Scott Street, it is not too late to stop even more insensitive accommodation in an area like this.

#### **C. Built Character**

Most of the existing houses on Scott Street show similar residential built character values as following:

- similar scale and form of the building, including roof forms,
- architectural detailing including features such as verandas, materials and front entry design and placement
- complementary and compatible building design.

## SUBMISSION TO PROPOSED PLAN CHANGE PC14 for Scott Street in Sydenham

The MDRS do not consider such residential character values and hence will over time allow accommodation being built which will destroy the special character of this area.

A few years ago, council installed historic looking street lamps to enhance the heritage look of the street. One would assume that Council has already acknowledged the distinctive character of Scott Street.

Also, any demolition of a pre 1900 house requires permission from Heritage NZ and an archaeologist supervising the demolition. It is time to go a step further and apply the Qualifying Matter Residential Character Area to Scott Street to avoid a nice city street becoming a dark dank alleyway, introducing crime.

Scott Street's future will look very desolate if MDRS apply without the Qualifying Matter Residential Character Area.

## SUBMISSION TO PROPOSED PLAN CHANGE PC14 for Scott Street in Sydenham

### WHAT SCOTT STREET RESIDENTS HAVE TO SAY

#### **Bernadine Worsdale, 25 Scott Street**

I am opposed to the height restrictions being available to new buildings in this street. I have lived in Scott St for the past 14 years, and have enjoyed the quiet street, the trees and character in this street! These developments will also affect the light and sunshine. The street is very narrow which is causing congestion and lack of parking.

#### **Janet Schmidtke and Wayne Newsome, 16 Scott Street**

A lovely house built around the 1930's as railway workers cottage accommodation. This has been updated and modernized, but still maintaining its external character.

We have lived here for 22 years and have seen the character cottages updated without compromising their external features. This has kept our wee street looking good and visitors comment on how lovely the street feels and looks.

The narrow road way adds to the character with all the old fashion street lighting in place.

However, off street parking can become an issue at times, plus the lack of close bus stops to use. This street also is open to the busy Brougham Street which allows increased traffic flow with motorists taking short cuts down Scott Street to avoid the lights on Antigua/ Strickland Streets and at 50kms an hour speed limit, makes this a very dangerous street even with judder bars installed.

Finally, this is a very nice street to live in and it would be a shame to lose this as a character street all because of high density housing law changes.

#### **Annette and Michael Williams, 26 Scott Street**

We came to Scott Street after making the decision to down-size when our children left home. We were looking for a smaller section on the flat with a single storey house that would be our home for the last years of our working life and into retirement. The proximity to the city centre was a big consideration, but after living in the street for almost nine years we really appreciate the surrounding neighbourhoods and the wide range of hospitality, shopping and recreational options within walking distance or a short journey by car.

The house we bought was derelict, and after consultation we decided to demolish and rebuild rather than repair, but maintain the original appearance of the four-room worker's cottage that was first built on our section sometime around 1875. We wanted to keep the heritage streetscape that had so strongly appealed to us from the first time we drove down Scott Street. We worked closely with the CCC planning staff, with encouragement and advice from Heritage New Zealand, to find the best solution to our living needs while

## SUBMISSION TO PROPOSED PLAN CHANGE PC14 for Scott Street in Sydenham

acknowledging the historic values of the neighbourhood. We now have what appears to be a 19<sup>th</sup> century cottage on the outside, while inside we have a warm modern and energy-efficient living space that works really well for us.

The diversity of the local community was an unexpected bonus. We live in a street of mixed rentals and homeowners, with people from different walks of life and different cultures. The neighbourhood cats command the street during the day, and people amble down the middle of the road on their way to the city. Life moves a little more slowly here.

The narrow width of the street slows the traffic (most of the time), and by evening most of the parking spaces on both sides of the road are full – with so many of the smaller properties having limited off-street spaces parking can be at a premium in evenings and weekends. Any increase in the number of cars and inhabitants on the street would cause major issues, and potentially life-threatening situations if emergency vehicles were unable to pass.

The history of Scott Street and the surrounding area is only a small part of Christchurch's local history, but the working-class housing still lining the street tells its own story of immigrants struggling to improve their lives and give hope to their families. It is a story worth preserving and protecting.

### **Susanne Schade, 4 Scott Street**

I purchased 4 Scott Street in 2010 and enjoyed living here ever since. When I first came to Scott Street I was captivated by the lovely houses along the street, the size and history of the houses appealed to me very strongly. Although my house has been built early 2000 it shows all the character features, the scale, form and building materials of the original cottages. It certainly blends in. The community in Scott Street is fantastic, neighbours here know each other and take care of each other. It is a very pleasant place to live especially in these uncertain times we are living in now. To see such a lovely place at risk to be destroyed is heart breaking and unnecessary.

### **Ryan and Natalie Holder, 10 Scott Street**

My partner, Natalie, and I moved into 10 Scott Street in March 2022. One of the main reasons we purchased the house was its character and charm and that of the wider street, with its numerous cottages and old-fashioned street lamps.

The front part of the house was built circa 1900 as a Workerman's cottage and it still retains the heritage look of the original dwelling. When you walk down our part of the street, the long history of the suburb is immediately brought to mind, as the architecture is so distinct from the usual 1960s structures.

Like our neighbours, we are proud of the character and history of our home and are keen to do what we can to protect them in the future. While we look forward to our suburb growing and undergoing redevelopment, we hope the qualities that make our neighbourhood special will be upheld. We support this submission and hope that the council will join our efforts to maintain our slice of character and history.

## SUBMISSION TO PROPOSED PLAN CHANGE PC14 for Scott Street in Sydenham

### **Kimberley McLaughlin, 6 Scott Street**

I'm the owner of the very cute cottage at 6 Scott St and would love to see the lovely Scott Street categorized as a Character area. My home was built back in 1890, much like other cottages on the street built in the same era. The cottage instantly won my heart over when I looked at purchasing a home back in 2021. While the home has been updated, it still has character features such as the glass windows and ceiling design. Beyond this, the home has a lovely cottage style garden and the rest of the homes on the street have a similar look and feel to them. I often hear from friends visiting for the first time that Scott St is adorable, and totally unexpected for the area - you don't expect to see small cottages like ours right outside the CBD. But that's part of the beauty of the street. It's quiet, quaint and unassuming. My hope is that the street is granted as a character area to preserve this little pocket of history in Christchurch.



## **A HISTORY OF SCOTT STREET**

by Annette Williams M.A. (Hons.) Hist.

### **Scott Brothers**

On 17 June 1870, the Scott brothers, John Lee and George, arrived in Lyttelton, New Zealand on the ship *Ramsay*. John brought his wife, Elizabeth, and their mother and a third brother joined them some years later. John Lee and George Scott were young (only 22 and 19 respectively) but they were hard-working and ambitious to improve their lot in life<sup>1</sup>. They acquired several lots of land on 23 December 1875 when rural sections 238 and 239, owned by Alfred Creyke, were subdivided in the District Plan 77. These lots became known as Scott's Road, then later variations on the Scott name with Sir Walter Scott's Road, Scott's Road again, then finally Scott Street. Worker's cottages were built, presumably by the Scott brothers, on the land in Scott's Road and elsewhere in Addington and Sydenham, then sold to working men and their families.

The Scott brothers were originally trained as patternmakers but acquired jobs as joiners, and soon began their partnership which later became the engineering firm Scott Brothers with premises in Manchester Street. Scott Bros. became well known for building quality engineering, including bridges, railway locomotives, and the Atlas kitchen stove. One brother, John Lee Scott, lived in Colombo Street, Sydenham and was a long-standing member of the Sydenham Council. George Scott was also involved in local government, serving for several years as Chairman of the Heathcote Road Board, then the Heathcote County Council.

### **The Development of Scott Street**

The Scotts subdivided their property into sections fronting a thoroughfare (later to become Scott Street; LINZ 1875) and the cottages were built. The Scott brothers did not take any mortgages against the parcel of land, which would enable a more exact dating of the cottages' construction, but it is assumed that the houses were built by the Scott brothers in 1875 or 1876.

The attached copy of District Plan 77, dated 1875, shows that at the time the sections in the street were a standard 66 2/3 yards wide<sup>2</sup>. Scott's Road itself was narrow, and legally a private road, so by 1878 the Sydenham Borough Council was working through a process in order to widen the road to the 40-foot width required for it to become a public road and be properly formed and metalled<sup>3</sup>. To achieve this land had to be acquired from the property owners in the private road, probably those living on the right-hand side from Brougham Street (or Pound Road) as these sections were developed for housing later than on the right. One of the nearby property owners pushing for the change of status from private road was J. G. Ruddenklau, later Mayor of Christchurch from 1881-83.

The condition of the road was still an issue for the Council a year later when the Chief Inspector of Nuisances complained to the Local Board of Health about the unhealthy state of Scott's Road, citing several cases of typhoid in the street, and the urgent need for it to be properly formed. The Council agreed to cover the labour costs of forming and metalling of the road if the inhabitants could collect the funds necessary to purchase the materials<sup>4</sup>. But despite this, and further critical reports from the Inspector of Nuisances, Scott's Road's final width and form was not resolved until 1887.

In 1910 the Christchurch City Council had decided to renumber certain well-known streets in the city "to remedy the multiplication of names which at present existed, and with a view to facilitating the delivery of correspondence and in other matters in which the address was an essential consideration"<sup>5</sup>. For Scott Street this meant that instead of numbering from the Brougham Street end, properties were now numbered from the opposite end, remaining the case today.

### **Living in Scott Street pre-1900**

The Russell family were early residents of Scott Street, arriving from England on the *Himalaya* in 1875 as assisted immigrants. Matriarch Mary Ann snapped up three of the Scott Street properties and by 1882 had extended the house at No. 20 from the original 4 rooms to 7 rooms. Her "husband" George Joseph Russell (he

was later revealed to be the lodger, not her husband in a court case in 1887) and Mary Ann's son George Joseph Russell Jnr. initially worked for the Scott Brothers as engineers. They both ended up working at sea as marine engineers, with both dying at sea in 1891 and 1908 respectively.

From 1882-1885 George Jnr. was the leading light in the campaign to raise funds for Christchurch's first band rotunda, originally located in Latimer Square, but after some controversy relocated to Victoria Square. There it was the stage for numerous brass band concerts and political addresses and became the envy of other borough councils in Christchurch who competed to build their own local rotundas.

Annie and Reuben Light of Scott's Road suffered as the result of a scam in 1885. The opportunity to make money by on selling some jewellery was offered to Annie, and to smooth the deal a mortgage of £190 was raised on their house by the same man offering the jewellery – a John Russell (possibly Mary Ann's son). The jewellery turned out to be of dubious value, the mortgage payments could not be made, the case involving a charge of false pretences came to court, but John Russell was found not guilty of larceny, and Reuben Light, struggling to provide for his eleven children, filed for bankruptcy.

In August 1898 a young man, William Harper of Linwood, died late one night when after seeing his lady friend to her door in Johnston Street, he rode his bicycle (with the lamp unlit) down the unlit Scott Street and ran into the shaft of the equally unlit night soil cart. He suffered serious internal injuries to his liver, dying shortly after he had been carried from the road to Mr. French's house at (then) number 39. In the subsequent court case night contractor Robert Gallagher was charged with neglecting to display lights on his vehicle and leaving his vehicle unattended without locking the wheels<sup>6</sup>. Willie Harper's ghost is said to haunt the house that belonged to Mr. French.

### **Scott Street as part of Willowbank**

Along with Burns Street, Windmill Road (now Antigua), Strickland Street and Johnston Street, the area was sometimes described in the early days as "Willowbank", after the willows lining the banks of Jackson's Stream<sup>7</sup>.

The Willowbank community in the 1880s and 1890s would have been a contained one, consisting mostly of workers living in small properties such as those built in Scott's Road, but with some larger properties that merited a "name". These included 'The Grove', owned by leading nurseryman and first Mayor of Christchurch William "Cabbage" Wilson (later Nazareth House), 'The Pines', owned by the Pugh family, R.J Harman's house 'Crohane', Edward Reece's property 'Forres House'<sup>8</sup> and Samuel Smart's residence in Milton Street, close to the popular recreation spot "Smart's Pond"<sup>9</sup>. There were a number of local shops to supply the householders' needs, with the Willowbank Store on Windmill Road (named after William Derisley Wood's mill that operated there from 1856-1862), and a cluster of shops on the corner of Scott's Road and Pound Road, including a baker and a butcher. And the City Pound was located close by on Pound Road, later Brougham Street.

Drainage and sanitation issues were an ongoing concern for the Sydenham Borough Council, with particular problems associated with Jackson's Creek (or Stream) which ran through the properties that lay immediately to the rear of the left-hand Scott's Road houses. In 1882 a complaint was brought against the Drainage Board in the District Court by Edward Reece through whose property the stream ran, objecting to the scum and other offensive matter left on the banks of the stream after Drainage Board workers had cleared the waterway. Not only Reece's family, but the gardener, George Goodman, resident of Scott Street, had fallen ill as a result, it was claimed, of the contamination of the land along the stream's banks<sup>10</sup>.

A search of the digitised newspapers in Papers Past<sup>11</sup> reveals a small and active community in Scott's Road itself. Quite apart from regular notices advertising properties for sale or rent, and people seeking work, there are also advertisements for produce (potatoes, cabbage seedlings, plums, fruit trees), livestock, harness horses and traps, bicycles, and lost jewellery and dogs, even a parrot. And there was even correspondence from W. H. Jackson to the Sydenham council calling their attention to a "house of ill-fame" in the street in 1885<sup>12</sup>. The letter-writer was referred to the police.

## Scott Street today

Twelve worker's cottages still exist in Scott Street, being numbers 3, 6, 7, 9, 10, 11, 13, 16, 21, 22, 24 and 26. No. 18 has been demolished due to extensive earthquake damage following the 2011 quakes. It is most likely that the even-numbered properties on the left-hand side of the road (from Brougham Street) that are shown in the original 1875 map were the cottages built by the brothers.

The houses followed the pattern of a four-room dwelling divided by a hallway in the middle. Most of the cottages still standing have been kept to this basic four rooms with small extensions or lean-to porches. One notable exception is at what is now 26 Scott Street where a substantial addition was made sometime between its construction around 1878, and 1882, and later additions made to turn the cottage into flats, sometime in the 1950s. The existing cottage built in 2014 was deliberately designed to replicate the external appearance of the original building, and retain the original footprint in order to preserve the heritage streetscape.

## References

N.B. All newspaper references from Papers Past <http://paperspast.natlib.govt.nz>.

<sup>1</sup> [www.nzine.co.nz/features/scott\\_bros.html](http://www.nzine.co.nz/features/scott_bros.html) 17/02/2009

<sup>2</sup> *Deposit Plan of part of R.S. No. 239 Certificate of Title Vol. V. Folio 20: the property of Messrs J.L. Scott & G. Scott [DP77], 1875* (supplied by New Zealand Historic Places Trust)

<sup>3</sup> *The Star*, 11 June 1878, p. 3

<sup>4</sup> *The Star*, 24 June 1879, p. 3

<sup>5</sup> *The Star*, 7 October 1909, p. 7

<sup>6</sup> *The Star*, August 18 1898, p. 3

<sup>7</sup> *Sydenham: the model borough: an informal history*. Christchurch, New Zealand, Federation of University Women, Canterbury Branch, 1977

<sup>8</sup> *Sydenham: the model borough of old Christchurch*, p.19

<sup>9</sup> *Sydenham: the model borough of old Christchurch*, pps. 91, 63

<sup>10</sup> *The Star*, 11 July 1882, p. 3

<sup>11</sup> Papers Past <http://paperspast.natlib.govt.nz>

<sup>12</sup> *The Star*, 17 November 1885, p. 4



Figure 3. Detail of the Scotts' rural section subdivision in 1875. Mary Ann Russell's purchases (Lot 10, Pt Lot 9, and Pt Lot 8) are outlined in red. Image: LINZ 1875.

SUBMISSION TO PROPOSED PLAN CHANGE PC14  
for Scott Street in Sydenham

APPENDIX A

CURRENT RATIO DWELLING / SITE

<b>STREET NUMBER</b>	<b>BUILDING incl. accessory buildings sqm</b>	<b>SITE AREA sqm</b>	<b>RATIO percentage</b>
1	75	200	37
2	136	411	33
3	189	355	53
4	78	223	35
6	88	257	34
7	93	278	33
9	85	328	26
10	106	468	22
11	145	471	30
13	102	471	21
14	134	468	28
16	145	455	32
17	197	512	38
21	107	514	21
22	104	376	27
23	256	455	56
24	82	324	25
25	133	480	27
26	127	489	26
28	150	363	41
29	74	480	15
30	102	355	29
31	174	471	37
34	123	224	55
34a	?	273	
36	151	490	31
39	127	775	16
40 + 42	233	488	47

**Average site coverage**

**32% < 50% MDRS**






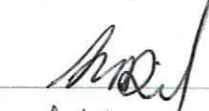

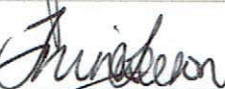


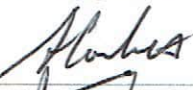

SUBMISSION TO PROPOSED PLAN CHANGE PC14  
for Scott Street in Sydenham

RESIDENTS SUPPORTING THIS SUBMISSION

NAME	ADDRESS	SIGNATURE	DATE
Janet Schmittke	16 Scott St	J Schmittke	20/4/23
Wayne Newsome	16 Scott St	W Newsome	20/4/23
James McEwan	21 Scott St	J McEwan	20/4/23
Ward Poulter	22 Scott St	W Poulter	20/4/23
P L L...	24 Scott St	P L L...	20/4/23
Susan Linklater	24 Scott St	S Linklater	20/4/23
Bernadine Worsdale	25 Scott St	B Worsdale	20/4/23
Ryan Holder	10 Scott St	R Holder	20/4/23
Shoen Cropp	1 Scott St	S Cropp	22/4/23
Heri Beckett	11 Scott St	H Beckett	23.4.23
Jon Shields	13 Scott St	J Shields	23.4.23
Annaliese Walker	14 Scott St	A Walker	23.4.23
VINODNEPURI	23 Scott Street	V.V. Kumari	23/04/2023
Somya Nigam	23 Scott Street	S Nigam	23/04/23
Annette Williams	26 Scott St.	A Williams	23/4/23
Michael Williams	26 Scott St	M Williams	23/4/23

SUBMISSION TO PROPOSED PLAN CHANGE PC14  
for Scott Street in Sydenham

RESIDENTS SUPPORTING THIS SUBMISSION

NAME	ADDRESS	SIGNATURE	DATE
James Poole	9 Scott Street		23.04.23
Roxanne Warburton	9 Scott Street		23/4/23
Stacy Mower	30 Scott Street		23/4-23
Stef Fraser	40 Scott St		23/4/23
Brandon Fraser	40 Scott St		23-04-23
Sue Bird	42 Scott St		23/4/23
Jessie Harland	34 Scott St		23/4/23
Trina Leeson	28 Scott St		23.04.23
JOMAL	28 Scott St		23.04.23
Brianna	28 Scott St		23.04.23
Lew Corbett	2 Scott St		23-04-23
Charles Snow	3 Scott St		23.4.23

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

## Submitter Details

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

**First name:** Sandamali **Last name:** Ambepitiya

**Preferred method of contact** Email

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**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** sandamali@propertynz.co.nz

**Daytime Phone:**

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

## Attached Documents

File

Property Council New Zealand Submission

## Property Council New Zealand

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Submission on

# Proposed Housing and Business Choice Plan Change (PC14)

8 May 2023

**For more information and further queries, please contact**

Sandamali Ambepitiya  
sandamali@propertynz.co.nz  
0278708150



## Proposed Housing and Business Choice Plan Change (PC14)

### 1. Summary

- 1.1 Property Council New Zealand and its South Island Regional members (“Property Council”) welcomes the opportunity to provide feedback on Christchurch City Council’s Proposed Housing and Business Choice Plan Change (PC14) (“PC14”).
- 1.2 Comments and recommendations are provided on issues relevant to Property Council’s members.
- 1.3 In broad terms, we support the overall direction of PC14. However, we are concerned that some practical unintended consequences may result when it comes to implementation. For example, additional costs such as wind test thresholds, and fees such as financial contributions for not reaching density limits, could result in unintended design outcomes and/or restrict or slow down future development. Our submission makes several necessary recommendations to better allow for the implementation of the District Plan.

### 2. Recommendations

- 2.1 We recommend that Christchurch City Council (“the Council”):
  - Increase the wind test threshold requirements to 22 metres to allow for a buffer to the proposed Plan Change rules of 20 metre minimum building heights; and
  - Reconsider proposing financial contributions as an additional revenue source if density limits are not reached in greenfield development.

### 3. Introduction

- 3.1. Property Council is the leading not-for-profit advocate for New Zealand’s most significant industry, property. Our organisational purpose is, “Together, shaping cities where communities thrive”.
- 3.2. The property sector shapes New Zealand’s social, economic and environmental fabric. Property Council advocates for the creation and retention of a well-designed, functional and sustainable built environment, in order to contribute to the overall prosperity and well-being of New Zealand.
- 3.3. Property is the largest industry in Canterbury. There are around \$160.5 billion in property assets across Canterbury, with property providing a direct contribution to GDP of \$4.7 billion (14 percent) and employment for 31,380 Canterbury residents.
- 3.4. We connect property professionals and represent the interests of 146 Christchurch based member companies across the private, public and charitable sectors.

### 4. Draft Housing and Business Choice Plan Change

#### *The proposed zones*

- 4.1. Under the requirements of the National Policy Statement on Urban Development (“NPS-UD”), the Council must significantly up zone large portions of Christchurch. The Council is also required to enable developments of at least six storeys in walkable catchments around the City Centre, Metropolitan Centres and Rapid Transit Stations, unless there is a qualifying matter. The

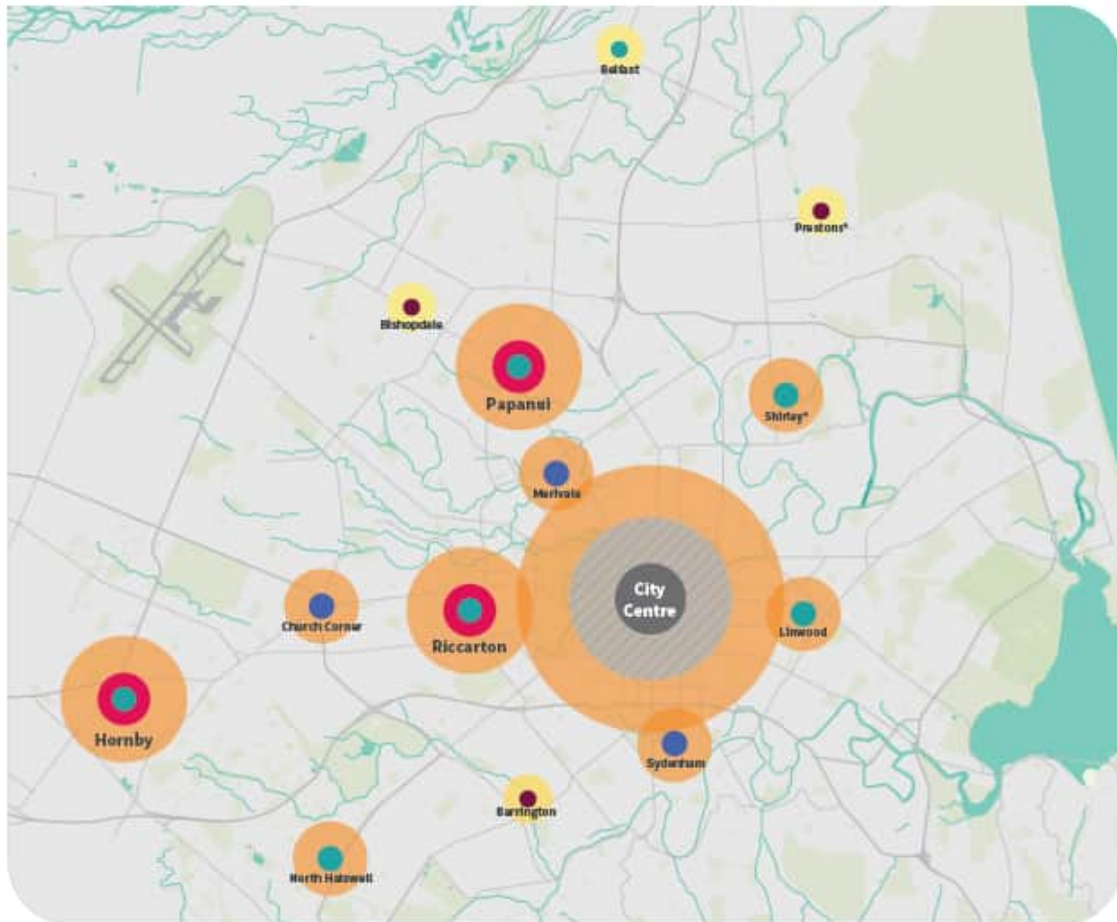
NPS-UD also requires additional intensification to occur around suburban centres. The RMA Amendment Act requires the Council to adopt the new Medium Density Residential Standards (“MDRS”) across the rest of urban Christchurch unless there is a qualifying matter.

- 4.2. Property Council supports the proposed 1.2km walkable catchment from the City Centre and the high-density zone precinct surrounding the residential and commercial zones within the city (see Figure 1). We believe that the proposed intensification is appropriate for Christchurch and gives effect to the intent of the NPS-UD in enabling new housing development.
- 4.3. We are supportive of the approach to increase density, particularly when density occurs in proximity to the city centre and town centres, while moving to lower density elsewhere. However, we have some concerns around adverse effects of current planning rules (e.g. wind test thresholds discussed later in our submission) that may result in unintended outcomes such as; ‘donuts’ or circles of undeveloped areas.
- 4.4. We also support an increased height limit of 32 metres to areas immediately surrounding the central city. However, we recommend that this wording be changed back to how it was written in last year’s consultation document i.e., “an increased height limit of 32 metres **within a walkable catchment of 800m or 10 minutes**” rather than “an increased height limit of 32 metres to areas immediately surrounding the central city”. This change in wording will lead to different interpretations and create uncertainty for the development community.
- 4.5. Feasibility is also an incredibly important part of the puzzle, particularly for residential developments. Consequently, planning regulations that add costs to developments (such as the wind test threshold) could likely result in new developments being built under the wind test threshold, or being built significantly higher.
- 4.6. Feasibility and the wind test threshold could result in unintended uniform design consequences for the entire city. For example, if 6 storeys were the most feasible residential developments, we could run the risk of the city ending up with only 6 storey developments. We encourage the Council to work closely with residential developers to understand feasibility aspects of development and encourage incentives for a wide range of development density and designs to result in a varied skyline across Christchurch.
- 4.7. The proposed plan change also recommends minimum subdivision on vacant sites in medium density residential zones as 400m<sup>2</sup>, and in high density residential zones as 300m<sup>2</sup>. We support these recommendations and believe these are reasonable.

Figure 1

## The proposed zones

The proposed plan change identifies residential and commercial zones where greater levels of development is enabled (densities and heights). In some zones, this will still be subject to resource consent where several matters must be considered, mostly in regard to site layout and building design.



### Key

-  **City Centre Zone:**  
90 metres; 45 metres around Cathedral Square and Victoria St, and 28 metres around the Arts Centre and New Regent St
-  **High Density Zone:**  
32 metres enabled (10 storeys, depending on building design)
-  **High Density Area (Residential and Commercial):**  
20 metres enabled (six storeys, depending on building design)
-  **Larger Town Centre:**  
22 metres enabled (six storeys, depending on building design)  
– applies to Riccarton, Hornby and Papanui
-  **Town Centre:**  
20 metres enabled (six storeys, depending on building design)
-  **Local Centre:**  
14 metres (four storeys, depending on building design)
-  **Larger Local Centre (Significant):**  
20 metres enabled (six storeys, depending on building design)
-  **Medium Density Zone Precinct:**  
14 metres enabled (four storeys, depending on building design)

### Note:

Central City Mixed Use Zone: 32 metres enabled

Rest of the city – Medium Density Zone – enables at least 12 metres (unless Qualifying Matters apply). For more information on Qualifying Matters refer to page 16.

\*For areas outside of the vacuum sewer wastewater constraints only. For more information refer to the Infrastructure section on page 17.

*Wind test threshold*

- 4.8. As per our previous submission, we note that six storeys are approximately 20 metres in height, and would require a wind test threshold under the current District Plan.
- 4.9. The Council's District Plan wind test threshold of 20m runs the risk of halting all development in Christchurch (excluding the medium density residential zones). For example, all future development, (within high density zone precinct, town centre) that may emerge into a metropolitan centre zone, town centre zone, and local centre (significant zone) will require a wind test threshold. Wind tests can add significant costs and possible delays to a project's timeframe.
- 4.10. We are therefore concerned that the wind test threshold, as it stands, could result in adverse outcomes such as: creating pockets of no development, delaying development and/or being a roadblock to future development in Christchurch.
- 4.11. Increasing the wind test threshold to 22 metres would remove the risk of adverse outcomes (i.e. discouraging development or donuts of no development within the 1.2km walkable catchment areas), allow for better design outcomes (such as reducing the risk of having a city of flat or smaller angled roofs which anecdotally can cause water tightness issues) and would also simplify the development process for both the Council and applicants.

*Changes to commercial zones*

- 4.12. Changes to the commercial zones are only in relation to height which Property Council is supportive of. The current commercial centre boundaries or subdivision proposals is for status quo which we also support.

*City Centre Zone*

- 4.13. The Council provides no minimum site size for subdivision in the Central City Zone. However, a resource consent will be required for most development within the city centre zone to enable the Council to assess the effects of shading, wind and urban design requirements. Consistent and clear guidelines are required to provide certainty for the development community, particularly given the length of resource and time it takes to establish a project prior to its construction. We urge the Council to work in partnership with the public and private development sectors.

*Central City Mixed-Use, Commercial Mixed-Use and Industrial zones*

- 4.14. We support the proposed adjustments to the requirements for new housing in some of the surrounding Central City Mixed-Use Zone and the Commercial Mixed-Use Zone. For example, designing the skyline so that the highest buildings are situated within the city centre and gradually decreasing in height as development moves into the suburbs. The Council believe that this will promote more housing variety, low quality design and low emissions living.
- 4.15. We support the proposed amendments that seek to rezone Industrial General Zoned land within proximity of the central city to Commercial Mixed Use and introduce Brownfield Overlay in the Industrial General Zone for land close to identified commercial centres that enables residential and mixed-use development. The rezoning of these types of land will encourage commercial mix-use, residential and mixed-use developments.

## 5. Financial Contributions

- 5.1. The Council proposes to amend the Revenue and Financing Policy to recognise financial contributions as a possible revenue source. The first proposal would see anyone wanting to develop land that does not retain 20 per cent tree canopy cover on a site charged a financial contribution. The fee will be used to plant trees on Council-owned land. This proposal is one that is clear cut and ringfenced, therefore we are supportive.
- 5.2. However, the Council need to be mindful of other fee proposals that could result in ‘double-dipping’ particularly when exploring ways to collect financial contributions for greenfield development. Legally, the Council will not be able to collect financial contributions as well as development contributions from the same development to fund the same activities. In practice, this can be difficult to implement, which is why many councils look at alternative funding mechanisms instead.
- 5.3. On page 15 of the consultation document, it states that the Council believes that by having the highest buildings within the city centre and gradually decrease in height, this will promote more housing variety. The Council’s proposal to explore opportunities to charge financial contribution fees in greenfield areas where density targets are not achieved could have negative impacts of a one-size-fits-all approach to housing.
- 5.4. This could result in unintended consequences of less variety of housing for Christchurch which is contrary to the Council’s ambitions. Furthermore, as mentioned earlier, if the wind test threshold remains at 20 metres and a financial contribution density incentive fee is enabled, it may discourage future development entirely if it means the only option is having to pay additional costs (either a wind threshold test or a financial contribution fee).
- 5.5. On the other side of the spectrum, increased fees often end up being passed to the end consumer, namely the purchaser. Increased development contribution fees or the introduction of financial contribution fees likely result in the following outcomes:
- Additional costs begin passed on to the eventual buyer, making housing more expensive; and/or
  - Planned developments are postponed or cancelled, due to increased costs reducing the overall feasibility of the development or project.
- 5.6. At a time where costs continue to rise, we recommend the Council do not introduce the proposal to use financial contributions as another revenue source if density limits are not reach within greenfield development.

## 6. Character Areas and Heritage Areas

- 6.1. The Council proposes introducing a resource consent requirement as a restricted discretionary activity to help protect Character Areas. The previous draft plan saw the addition of 65 heritage buildings, so we are glad to see this has dropped to 44 buildings post notification.
- 6.2. We believe that it is important to effectively balance the preservation of special character with unlocking additional development capacity for Christchurch. It is crucial that Christchurch preserves heritage where appropriate, but also enable development to meet future housing needs.

6.3. In broad terms, we are comfortable with the proposed intention of introducing resource consent requirements as a restricted discretionary activity to help protect Character Areas. However, given the scale of the proposal and introduction of 11 new residential heritage areas, we wish to highlight the importance of ensuring that Christchurch has sufficient development capacity. This can be achieved through enabling and encouraging greater height and density within high density zone precincts, town centres and metropolitan centres.

## 7. Public Transport Qualifying Matter

7.1. The Council is proposing to limit the extent of where the MDRS would be enabled to near the highest-frequency bus routes and routes that connect larger commercial centres. This Qualifying Matter focuses intensification within and around commercial centres. This is to promote the use of public transport and reduce dependency on the use of private vehicles. The Qualifying Matter would not restrict any current Residential Medium-Density Areas or proposed High-Density Areas.

7.2. Property Council strongly supports density near key transport nodes, especially those that connect larger commercial centres. However, we are concerned that Christchurch City Council is establishing public transport as a qualifying matter in order to reject future MDRS or proposed high-density areas. It is important that there be a co-ordinated approach between the delivery of future transport and housing projects.

## 8. Conclusion

8.1. We support the overall direction of PC14. We urge the Council to increase the wind test threshold and reject the proposed introduction of financial contribution fees if density limits are not reached in greenfield developments. Incorporating these changes will better enable and encourage implementation of the NPS-UD.

8.2. Property Council members invest, own, and develop property in Christchurch. We wish to thank the Council for the opportunity to submit on PC14 as this gives our members a chance to have their say in the future of our city. We also wish to be heard in support of our submission.

8.3. Any further enquires do not hesitate to contact Sandamali Ambepitiya, Senior Advocacy Advisor, via email: [sandamali@propertynz.co.nz](mailto:sandamali@propertynz.co.nz) or cell: 021 045 9871.

Yours Sincerely,



James Riddoch

South Island Committee Chair

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

## Submitter Details

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

**First name:** Ella **Last name:** Shields

**Preferred method of contact** Email

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** ella.shields@ravensdown.co.nz

**Daytime Phone:** 021541427

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.

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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

Ravensdown\_Submission on CCC District Plan PC14\_FINAL 050523

# Submission on the Proposed Housing and Business Choice Plan Change (Plan Change 14) to the Christchurch District Plan

## Ravensdown Limited

Date: 5 May 2023

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

**SUBMITTER CONTACT DETAILS:**

292 Main South Road  
PO Box 1059  
CHRISTCHURCH 8140

**Contact:** Ella Shields  
Planner & Policy Analyst

**Mobile:** 021 541 427

**Email:** [ella.shields@ravensdown.co.nz](mailto:ella.shields@ravensdown.co.nz)

**ADDRESS FOR SERVICE:**

Response Planning Limited  
21 Harry Ell Drive  
CHRISTCHURCH 8222

**Contact:** Jane Whyte  
Director

**Mobile:** 027 259 5303

**Email:** [jane@responseplanning.co.nz](mailto:jane@responseplanning.co.nz)



## 1. About Ravensdown Limited

### Ravensdown's Interest in Regulatory Processes

- 1.1 Ravensdown Limited (**Ravensdown**) takes an interest in a wide range of resource management matters that relate to rural activities, as well as its own industrial activities. Ravensdown has its own manufacturing, quarrying and bulk stores activities to service its customers (as shown in **Figure 1** below), including, within Christchurch City, its Christchurch Works in Hornby. Ravensdown supports the need to manage the effects of its operations on the environment and is committed to fulfilling its environmental obligations and responsibility to continue to operate sustainably.
- 1.2 Ravensdown participates in regulatory development processes to ensure that mechanisms incorporated into national, regional and district level planning documents, find an optimal balance between any necessary restrictions on farming activities, as well as Ravensdown's industrial operations. The use of products and services developed by Ravensdown assist with achieving sustainability, growth and production in the rural sector, and ultimately the economic and social wellbeing of the rural community and New Zealand.
- 1.3 In this context and given the purpose of the Proposed Housing and Business Choice Plan Change to the Christchurch District Plan (**District Plan**), hereafter referred to as '**PC14**', Ravensdown's interest in PC14 relates to the compatibility of providing residential intensification opportunities near its existing manufacturing facility in Hornby.

### Ravensdown's Shareholders in New Zealand

- 1.4 Ravensdown is a farmer-owned co-operative with approximately 18,000 shareholders in New Zealand. Thirty-seven percent (37%) of these shareholders are dairy farmers, with the balance comprising a mix of sheep, beef and other livestock (46%), horticulture and cropping systems (10%) and others (7%).

### Ravensdown's Business

- 1.5 Ravensdown exists to support smarter farming for a better New Zealand. As a farmer-owned co-operative, Ravensdown's products, expertise and technology helps farmers manage their environmental impacts and optimise returns from the land.
- 1.6 Ravensdown is an integral part of the food creation process, where the food is grown for livestock or for people. Ravensdown tests for, advises about, buys, manufactures, ships, stores, spreads, measures and maps food-creating nutrients and fertiliser for its farmers in an integrated way. Ravensdown operates a network of fertiliser bulk stores, quarries and three superphosphate manufacturing plants throughout New Zealand (**Figure 1**).
- 1.7 Ravensdown is a science-focussed organisation delivering quality agri-products, technologies and services.





- 1.8 In summary, Ravensdown provides the nutrients that nourish New Zealand's soil which, in turn, feed the plants and animals that deliver the products that can command a premium on the world stage. Smarter farming is all about smarter choices for the environment. Sales are important, but as a farmer-owned cooperative, it is not Ravensdown's policy to sell farmer shareholders more than they need. Precision agriculture is about the right amount of the right inputs in the right place, applied at the right time. Smarter farming is also about always having the right reason - the focus on the environment, community and kaitiaki (stewardship).

## 2. SUBMISSION

### Introduction

- 2.1 PC14, which was publicly notified by Christchurch City Council (**Council**) on 17 March 2023, responds to the requirements of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (**RMA-EHS**) and the National Policy Statement for Urban Development 2020 (**NPS-UD**).
- 2.2 As a broad overview, Ravensdown understands that the RMA-EHS and NPS-UD requires Council, as a 'tier 1 urban environment', to provide for more intensive residential development and sufficient business land, into the future, within Christchurch city. This includes enabling housing choice in accordance with the Medium-Density Residential Standards (**MDRS**), as now contained in Schedule 3A of the Resource Management Act 1991 (**RMA**), with the MDRS specifying density standards which provide for up to three three-story residential units on a site as permitted activities (subject to complying with other density standards). The NPS-UD also requires building development, greater than the MDRS, to be provided for both residential and commercial development within and around the central city, suburban commercial centres and around high-frequency and high-capacity public transport systems. However, 'Qualifying Matters' (**QM**) may be applied to the more permissive intensification and development provisions, which modify / restrict the development potential so as to maintain or protect values or provide for the management of potential effects.
- 2.3 Given the above context, Council's approach to meeting the requirements of the RMA-EHS and NPS-UD, as contained in PC14, is broadly supported by Ravensdown. This high-level support relates to the proposed rezoning of parts of Christchurch city to provide for both high and medium density residential development, albeit subject to, in some circumstances, to the application of specific QMs.
- 2.4 However, while broadly supporting the intent and aim of PC14, Ravensdown has some site-specific concerns about the proposed plan change, providing for residential intensification of land located to the southwest and south of Ravensdown's '**Christchurch Works**' to a High Density Residential Zone (**HRZ**). The Christchurch Works, which is located within an Industrial Heavy Zone (**IHZ**), is one of Ravensdown's three manufacturing sites in New Zealand which manufactures superphosphate and supplies other fertilisers products to New Zealanders.

- 2.5 Given this site-specific issue, Ravensdown, through this submission, is seeking amendments to PC14 to ensure that potential conflicts between incompatible activities, in this instance heavy industrial and intensive residential development, are minimised and avoided (SD Objective 3.3.14 (3.3.15 under PC14)).

### General Submission Approach

- 2.6 Ravensdown's interest in PC14, as identified in **paragraphs 2.4 and 2.5** above, arises from the proposed residential intensification, from a Residential Suburban Zone (**RSZ**) to HRZ, of land located to the southwest and south of the Christchurch Works, as outlined in red in **Figure 2** below.



**Figure 2 – PC14 Planning Map (Interactive) – Proposed Zoning around the Christchurch Works (312 Main South Road).**

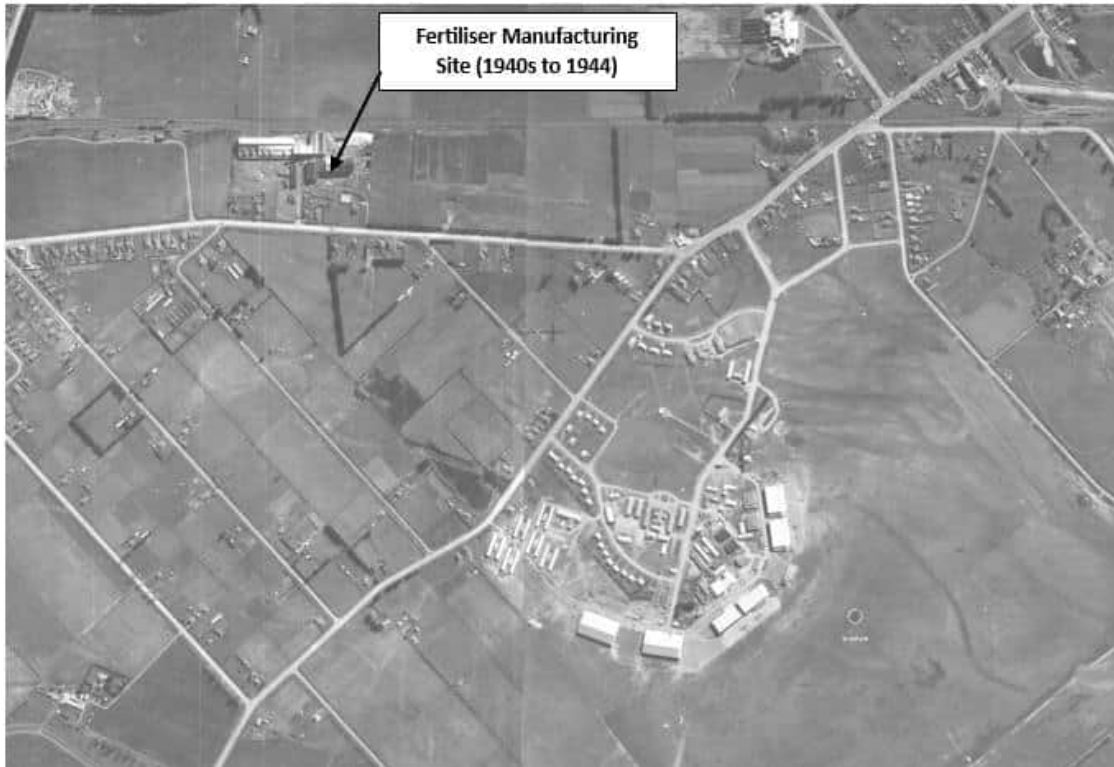
- 2.7 The potential implications of the proposed re-zoning of the land to the southwest and south of the Christchurch Works, and the associated 'Residential-Industrial Interface Qualifying Matter' (**RII-QM**), are the only matters arising from PC14 addressed within this submission.
- 2.8 In preparing this submission, Ravensdown are seeking amendments to PC14 to ensure that potential conflicts between incompatible activities, in this case, heavy industrial and intensive residential activities, do not arise from PC14 (as noted above in **paragraph 2.5**).

- 2.9 Given the focus of Ravensdown’s submission on PC14, this section of the submission (**Section 2**) is structured as follows:
- (a) Where relevant to PC14 and Ravensdown’s area of interest in the plan change, a brief description of the **operations of the Christchurch Works** and the **area’s general environmental** setting, based on the current zoning that applies to the area, is provided in **paragraphs 2.10 to 2.29**. This provides relevant background for the consideration of the implications, for Ravensdown, arising from PC14.
  - (b) In **paragraphs 2.30 to 2.41**, a **summary of the PC14 provisions relevant to Ravensdown and the Christchurch Works** is provided. This summary provides context for the next section of the submission.
  - (c) Based on the summary of PC14 provisions relevant to Ravensdown, the **issues arising from PC14** are outlined in **paragraphs 2.42 to 2.46**.
  - (d) The **relief sought** by Ravensdown, through this submission, is provided in **paragraphs 2.47 to 2.49**.

## **The Christchurch Works – Overview of Operations and the Area’s Environmental Setting**

### ***Background***

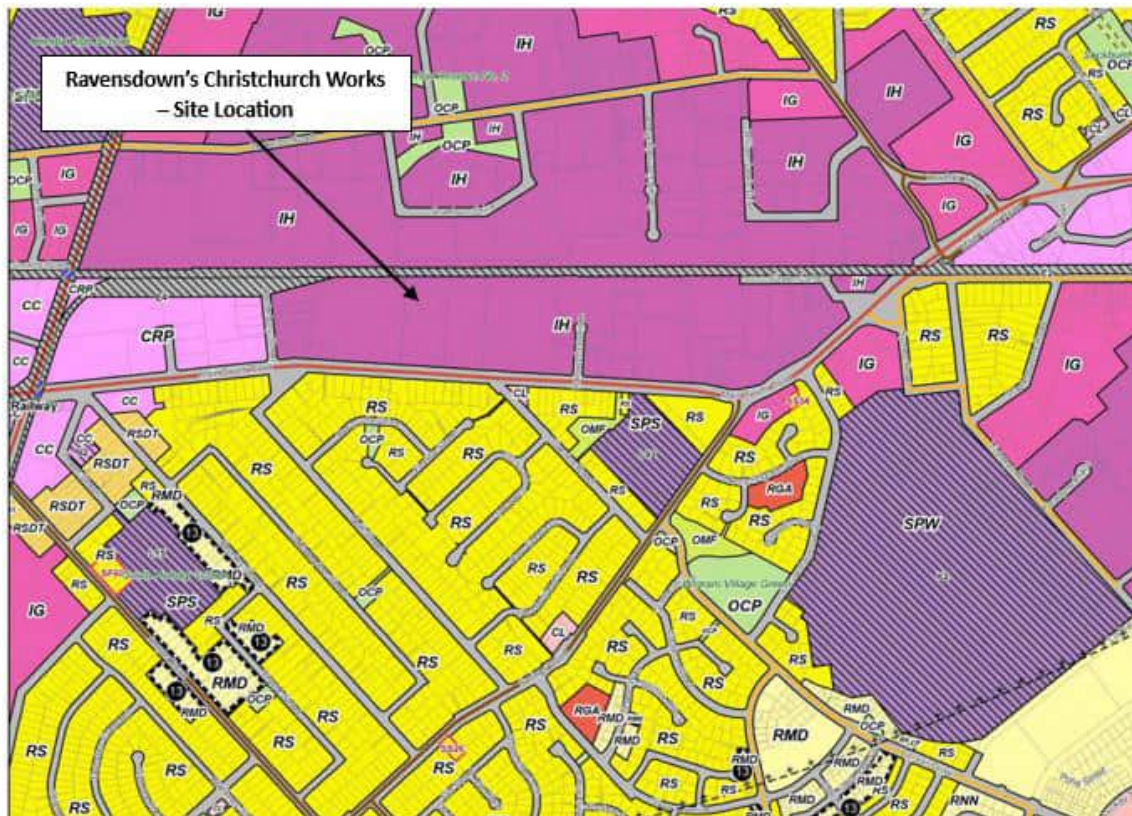
- 2.10 The manufacture of fertiliser started in 1922, following the construction of a new plant and associated facilities at the site. Ravensdown understands, at this point in time, there were only five residences in the immediate area of the works.
- 2.11 **Figure 3** below, which contains an aerial photograph of the area around the fertiliser works in the 1940s, shows the nature of development that was present in the area at that time. The Wigram air base, which seems to still be under development, is evident to the southeast of the site now associated with the Christchurch Works. Residential development on the southern side of Main South Road, albeit to the southwest of the site, is also evident.
- 2.12 Ravensdown took over ownership and operation of the site, from Kempthorne Prosser, in 1977. In 1978, the new company began trading as ‘Ravensdown Fertiliser Co-operative’, which is now known as Ravensdown Limited.
- 2.13 The Christchurch Works is located 312 Main South Road (as shown on **Figure 2** above), while Ravensdown’s corporate office is located immediately to the southeast of the manufacturing site at 292 Main South Road, Hornby.
- 2.14 Annually, the Christchurch Works currently manufactures between 110,000 to 160,000 tonnes of superphosphate, and despatches between 270,000 to 310,000 tonnes of bulk products annually.



**Figure 3 – Historic Aerial Photograph of Hornby including the Fertiliser Manufacturing Site (now Ravensdown’s Christchurch Works) (Source: Canterbury Maps, Historical Aerial Imagery, 1940 to 1944)**

### Site and Area's Environmental Setting

2.15 The existing nature of development in the area around the Christchurch Works is effectively reflected in the current zoning that applies under the District Plan, as shown in **Figure 4** below.



**Figure 4 – Operative Christchurch District Plan – Planning Map 37A.**

2.16 The Christchurch Works, given the nature of site operations, is appropriately located within an IHZ (as discussed further below), with land to the north and east of the site also zoned IHZ which reflects the industrial use of this area of land. To the west of the Christchurch Works land is zoned Commercial Retail Park Zone (**CRPZ**) which reflects the large format retail land use present in this area of Hornby. Land to the south (broadly speaking) of the Christchurch Works is zoned RSZ which reflects the existing residential character of the area. The existing nature of development in the area, which is considered to be largely consistent with the District Plan zoning, is evident from **Figure 5** below.



**Figure 5 – Aerial Photograph and the Christchurch Works and Surrounding Area (Source: Canterbury Maps)**

- 2.17 In relation to the residential land to the south of the Christchurch Works, Table 14.2.1.1.a, in support of Policy 14.2.1.1 of the District Plan, outlines the character of the RSZ and the nature of development that the zone is to provide for. As stated above, the RSZ that applies to the area of land to the south of the Christchurch Works, is currently largely characterised by the nature of development anticipated for this zone. Table 14.2.1.1.a describes the RSZ as follows:

***Residential Suburban Zone***

*Provides for the traditional type of housing in Christchurch in the form of predominantly single or two storeyed detached or semi-detached houses, with garage, ancillary buildings and provision for gardens and landscaping.*

*The changing demographic needs and increasing demand for housing in Christchurch are provided for through a range of housing opportunities, including better utilisation of the existing housing stock. A wider range of housing options will enable a typical family home to be retained, but also provide greater housing stock for dependent relatives, rental*



*accommodation, and homes more suitable for smaller households (including older persons).*

***The Christchurch Works – Appropriately Located within an Industrial Heavy Zone***

2.18 As noted above (and as identified in **Figures 2 and 4** above), the Christchurch Works is appropriately located in an IHZ.

2.19 Chapter 16 (Industrial) of the District Plan contains the provisions that apply to the management of industrial activities within industrial zones. In managing industrial activities, the District Plan provides for three different types, or levels, of industrial activities within industrial zones, as follows:

**16.1 Introduction**

...

- b. *This chapter provides for industrial and other compatible activities to occur in three industrial zones throughout the City, being the Industrial General, Industrial Heavy and Industrial Park Zones. Each zone has a different function, recognising its compatibility with surrounding land uses, the anticipated level of amenity in the zone, and the nature and scale of activities provided for. The adverse effects of activities are managed to support the anticipated outcome for the zone, while recognising that non-industrial sites adjoining an industrial zone will not have the same level of amenity anticipated by the Plan as other areas with the same zoning.*

...

**16.2.1.3 Policy – Range of industrial zones**

- a. *Recognise and provide for industrial zones with different functions that cater for a range of industrial and other compatible activities depending on their needs and effects as follows:*
  - i. *Industrial General Zone*
    - A. *Recognise and provide for industrial and other compatible activities that can operate in close proximity to more sensitive zones due to the nature and limited effects of activities including noise, odour, and traffic, providing a buffer between residential areas and the Industrial Heavy Zone.*
  - ii. *Industrial Heavy Zone*
    - A. *Recognise and provide for a full range of industrial and other compatible activities that generate potentially significant effects, including relatively high levels of noise, odour, heavy traffic movements, and the presence of significant amounts of hazardous substances, necessitating separation from more sensitive activities.*
  - iii. *Industrial Park Zone*
    - A. *Recognise and provide for industrial activities in the high technology sector and other industries in a high amenity environment dominated by open space and landscaping, and that generate higher volumes of traffic than other industries while having negligible effects in terms of noise, odour or the use and storage of hazardous substances.*

- 2.20 It is noted that the above provisions of the District Plan are not subject to amendment by PC14.
- 2.21 The key considerations outlined in the above District Plan provisions, where relevant to Ravensdown's submission, is that three different industrial zones are required that cater for the nature of activities taking place, that the activities that are grouped together are compatible with each other and that adverse effects of industrial activities need to be managed while also recognising that non-industrial sites adjoining an industrial zone will not experience the same level of amenity as other areas with the same zoning. More specifically, **Policy 16.2.1.3.ii** recognises that industrial activities in an IHZ, such as the Christchurch Works, will generate potentially significant adverse effects (including noise, odour, heavy traffic movements and hazardous substance presence) meaning that separation from more sensitive activities will be required.
- 2.22 The above policy framework provides for SD Objective 3.3.14 (SD Objective 3.3.15 in PC14) which requires incompatible activities to be controlled, primarily by zoning, to avoid and minimise conflicts between incompatible activities.
- 2.23 In relation to effects associated with industrial activities in industrial zones, the following objective and policy of the District Plan, are also relevant:

**16.2.3 Objective – Effects of industrial activities**

- a. *Adverse effects of industrial activities and development on the environment are managed to support the anticipated outcome for the zone while recognising that sites adjoining an industrial zone will not have the same level of amenity anticipated by the Plan as other areas with the same zoning.*

...

**16.2.3.2 Policy – Managing effects on the environment**

- a. *The effects of development and activities in industrial zones, including reverse sensitivity effects on existing industrial activities as well as, visual, traffic, noise, glare and other effects, are managed through the location of uses, controls on bulk and form, landscaping and screening, particularly at the interface with arterial roads fulfilling a gateway function, and rural and residential areas, while recognising the functional needs of the activity.*
- b. *Effects of industrial activities are managed in a way that the level of residential amenity (including health, safety, and privacy of residents) adjoining an industrial zone is not adversely affected while recognising that it may be of a lower level than other residential areas.*

...

- 2.24 **Objective 16.2.3**, and **Policy 16.2.3.2** in support of this objective, also identify that the adverse effects of industrial activities are to be managed to support the outcomes anticipated for the zone, while also recognising that sites adjoining industrial zones will not have the same level of amenity as other areas with the same zoning. **Policy 16.2.3.2.b**, in relation to the effects from industrial activities, identifies that effects are to be managed so that residential amenity (including health, safety and privacy of residents) adjoining an industrial zone is not adversely affected, even if residential amenity is at a lower level than other residential areas.

- 2.25 Ravensdown acknowledges, in the context of this District Plan policy framework, that there are a range of controls and compliance requirements arising from the District Plan that it is obliged to comply with. An example of this is the requirement to comply with the relevant District Plan noise limits. In addition to the District Plan requirements, Ravensdown must also comply with relevant national-level and regional-level permitted activity rules/regulations or resource consent requirements under the RMA, including, but not limited to, the site's air discharge permit (Consent CRC080001) which is discussed further below.
- 2.26 While the above obligations apply to Ravensdown, the operative District Plan provisions also clearly recognise that residential activities that adjoin an industrial zone, particularly an IHZ, cannot expect the same level of amenity as that which applies to the same residential zone but where it does not adjoin an industrial zone. It is these principles that underpin the issue raised and discussed in this submission.

***The Christchurch Works' Air Discharge Permit (Consent CRC080001)***

- 2.27 To provide a further example of the potential effects from industrial activities, the Christchurch Works operates under Consent CRC080001 which authorises the discharges to air from its site. The application for this discharge permit was lodged with the Canterbury Regional Council (CRC) in September 2007, and following appeal to the Environment Court, the discharge permit was issued, subject to conditions, in February 2010 for a consent term of 20 years (Consent CRC080001 expires on 4 February 2030). It is noted that CRC080001 was publicly notified, and notice of the application was also sent directly to 700 properties located within 500m of the Christchurch Work's site boundary.
- 2.28 This discharge permit recognises, particularly through the complaints procedure, monitoring and surveys required by the consent conditions, that there is potential for adverse effects to occur beyond the site boundaries including within the existing RSZ zoned land located to the southwest and south of the Christchurch Works (i.e., to the south of Main South Road). This monitoring and survey requirement in parts of the RSZ land largely arises as a result of the dominant easterly and nor-easterly winds in the area (i.e., the discharge from the site disperses over the residential dwellings within the RSZ land, particularly the land to the southwest and south of the site).
- 2.29 To provide context as to the potential adverse effects that may arise from the site's discharges to air, the main discharges<sup>1,2</sup> provided for by this consent include:
- (a) The discharge of sulphur dioxide and sulphur trioxide from the site's acid plant stack which has the potential to adversely affect human health. Consent CRC080001 contains a number of conditions in relation to this component of the discharge, including a

<sup>1</sup> The discharge of dust and odour are also associated with the site. However, the CRC080001 decision from the CRC's Hearing Panel concluded that, subject to complying with consent conditions, the effects of these discharges would be less than minor.

<sup>2</sup> Also, at the time the application was lodged and assessed by CRC's Hearing Panel, it was identified that there was a possibility that the discharges may have adversely affected buildings. However, it was subsequently confirmed that building materials degradation in the area was no different to expected rates of degradation for such materials, and therefore the site's discharges to air was not causing adverse effects on building materials in the area.



restriction on the amount that can be discharged, so as to ensure compliance with relevant air quality standards and guidelines that have been developed to ensure that human health is not being adversely affected. Monitoring carried out by Ravensdown, including at its off-site monitoring location, confirms compliance with the relevant air quality standards.

- (b) The discharge of fluoride from the manufacturing plant stack and from fugitive emissions from the manufacturing and dispatch area. Fluoride can cause visible injury to sensitive plants and etches glass. In relation to the effects of fluoride in the discharge on plants and glass, ongoing survey work required by the conditions, has identified that off-site effects continue to occur. In relation to the etching of glass, conditions attached to Consent CRC080001 require Ravensdown to replace windows (where light gloss units are 120 or below) etched by fluoride at its expense (including of residential dwellings), which Ravensdown has done during the term of this consent.

## **PC14 – Summary of Provisions Relevant to Ravensdown and the Christchurch Works**

### ***Introduction***

- 2.30 Given that the site-specific issue arising from PC14 for Ravensdown, the provisions of PC14 relevant to this submission relate to the proposed residential intensification of land to the southwest and south of the Christchurch Works from RSZ to Medium Density Residential Zone (**MRZ**) and HRZ, as well as the proposed RII-QM which is proposed to be applied to the HRZ where it adjoins the IHZ occupied by the Christchurch Works.
- 2.31 These provisions of PC14 are identified on the planning maps and provided for in PC14's amendments to Chapter 14 (Residential) of the District Plan. The nature of these provisions is described more fully in the following paragraphs of this submission, but an overview of these provisions are as follows:
  - (a) The MRZ allows (permits) buildings up to 12m in height, which is generally 3 storeys, and up to three residential units per site. The zone is mainly for residential buildings, including apartments and detached, semi-detached and terraced housing. A Sunlight Access QM and a height in relation to boundary standard applies to this zone. **Objective 14.2.6** of PC14 (provided in **paragraph 2.33** below) outlines that the zone are residential areas of predominantly MDRS-scale development of three-or four-storey buildings. This zoning aims to deliver on RMA-EHS and Schedule 3A of the RMA.
  - (b) The HRZ, within the 'Town Centre Intensification Precinct' which applies to the land to the southwest and south of Ravensdown's site (light green outlined area on the planning maps), allows (permits) residential buildings up to 14m in height, which is generally 4-storeys, and provides a consent pathway for residential buildings of 20m (6-storeys). This zone is mainly for residential buildings, including apartments. A Sunlight Access Qualifying QM and a height in relation to boundary standard also applies to this zone. This zoning aims to deliver, in part, on the requirements of Policy 3 and Clause 3.31 of the NPS-UD.

- (c) The RII-QM applies a 40m wide buffer restriction on residential development, from the boundary of adjoining industrial zones, so as to ensure that new residential activities are not adversely affected by noise (**Objective 14.2.12** of PC14 - provided in **paragraph 2.35** below). The RII-QM restricts residential building heights to 7m or 2-storeys, whichever is the lesser, as a permitted activity to protect residential areas next to industrial sites (via Built Form Standard / Rule 14.6.2.1.c<sup>3</sup>). In relation to the Christchurch Works and the RII-QM that applies to the residential zone to the south of the site, as the buffer has been applied at the industrial zone boundary, a significant portion of the 'buffer' traverses the Main South Road. The 'Qualifying Matters Section 32 Evaluation' (**s32 Evaluation**) (Section 6.22), which assesses the appropriateness of the proposed RII-QM, concludes that the RII-QM satisfies the requirements of Clause 3.33 of the NPS-UD (and thus Policy 4 of the NPS-UD). It is noted that this evaluation appears to only relate to the interface between noise from industrial activities and the MDRS (not the actual MRDZ and HRDZ provisions), and the interface of residential activities adjoining the Industrial General Zone (**IGZ**) on the basis that IGZ tends to buffer residential zones from the IHZ (paragraph 6.22.2 of the s32 Evaluation).

#### ***The Proposed Medium Density Residential Zone (MRZ)***

- 2.32 The nature of development to be provided for in the MRZ, under PC14, is outlined in **Policy 14.2.1.1** (Housing distribution and density) and associated Table 14.2.1.1.a, as follows:

***Medium Density Residential Zone - The zone includes the activities described in objective 14.2.6 and is used predominantly for residential activities with moderate concentration and bulk of buildings, such as detached, semi-detached and terraced housing, low-rise apartments, and other compatible activities.***

- 2.33 PC14 objectives and policies<sup>4</sup> that further describe the nature of the MRZ are as follows:

#### ***14.2.6 Objective – Medium Density Residential Zone***

***a. Medium density residential areas of predominantly MDRS-scale development of three- or four-storey buildings, including semi-detached and terraced housing and low-rise apartments, with innovative approaches to comprehensively designed residential developments, whilst providing for other compatible activities.***

#### ***14.2.6.1 Policy – MDRS Policy 1***

***a. Enable a variety of housing types with a mix of densities within the zone, including 3-storey attached and detached dwellings, and low-rise apartments.***

<sup>3</sup> Where Built Form Standard / Rule 14.6.2.1.c is not complied with, a discretionary activity resource consent is required in accordance with Rule 14.6.1.4.a.D7.

<sup>4</sup> PC14 Policy 14.2.6.2 is not relevant to Ravensdown's submission as it relates to 'Local Centre Intensification Precincts', and Hornby is a Town Centre, not a Local Centre.

### **The Proposed High Density Residential Zone (HRZ)**

2.34 The nature of development to be provided for in the HRZ, under PC14, is outlined in Policy 14.2.1.1 (Housing distribution and density) and associated Table 14.2.1.1.a, as follows:

**High Density Residential Zone** - *The zone includes the activities described in objective 14.2.7 and is used predominantly for residential activities with high concentration and bulk of buildings, such as apartments, and other compatible activities.*

2.35 PC14 objectives and policies that further describe the nature of the HRZ are as follows:

#### **14.2.7 Objective – High Density Residential Zone**

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

#### **14.2.7.1 Policy – Provide for a high density urban form**

a. *Enable the development of high density urban areas with a density that is responsive to current and planned:*

- i. *degree of accessibility to services and facilities, public open space, and multimodal and active transport corridors; and*
- ii. *housing demand.*

#### **14.2.7.2 Policy – High density location**

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

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

#### **14.2.7.3 Policy – Heights in areas surrounding the central city**

a. *Provide for 10-storey residential buildings consolidated around the City Centre zone to stimulate and support the city centre.*

#### **14.2.7.4 Policy – Large Local Centre Intensification Precinct**

a. *Enable the development of 6-storey multi-storey flats and apartments in, and restrict development to solely within, the Large Local Centre Intensification Precinct and the Town Centre Intensification Precinct.*

#### **14.2.7.5 Policy – High Density Residential Precinct**

a. *Enable the development of 6-story multi-storey flats and apartments in, and restrict development to solely within, the High Density Residential Precinct to manage intensification around the City Centre zone.*

#### **14.2.7.6 Policy – High Density Residential development**

a. *Provide for residential development within the High Density Residential Zone that:*

- i. *Ensures at least two storey development is developed;*
- ii. *Amalgamates existing sites as part of the development;*
- iii. *Locates building bulk towards the frontage of sites, enhancing the street wall.*

2.36 In the context of the proposed PC14 HRZ that applies to the land to the south of the Christchurch Works, high density residential development is to be provided near larger commercial centres as these are the areas where demand is expected given that commercial activities, community facilities and transport networks are available (**Objective 14.2.7** and **Policy 14.2.7.1**). High density residential development is to be provided around the Hornby Town Centre<sup>5</sup>, along with other areas, where the centre is within walking distance and given the activities planned and provided for within the centre (**Policy 14.2.7.2**). As the residential area around the Hornby Town Centre is identified in the planning maps as being within the 'Town Centre Intensification Precinct' (i.e., light green outlined area), 6-storey multi-storey flats and apartments are to be provided for (**Policy 14.2.7.4**). Within the HRZ, the policy framework aims to ensure that the minimum level of development is at least 2-storey, site amalgamation is provided for and that building bulk is located towards the front of sites to enhance the street wall (**Policy 14.2.7.6**).

### ***The Proposed Residential Industrial Interface Qualifying Matter (RII-QM)***

2.37 In proposing QMs as part of PC14, PC14 proposes an amendment to the Introduction of Chapter 14 (Residential) of the District Plan as follows:

*A number of the provisions in this chapter give effect to the requirements of the Act and the National Policy Statement on Urban Development to provide for intensification in urban areas, including by implementing the Medium Density Residential Standards. However, the Act enables those intensification requirements to be reduced where justified by a "qualifying matter". In this chapter the reduction in intensification due to qualifying matters has been implemented in two ways: by having the Medium Density Residential or High Density Residential zones, but enabling lesser intensification than the Medium Density Residential Standards require in the areas or sites in those zones where a qualifying matter applies; or by having a lower density residential zone, for example the Residential Suburban or Residential Hills Zone, because the rules for that zone provide the level of density that the qualifying matter necessitates. (Section 14.1.e)*

2.38 PC14 introduces a new objective and policy that specifically relates to the RII-QM (and **noise** from industrial activities), and thus the subsequent Chapter 14 standards and rules that place restrictions on residential development within the areas covered by the RII-QM. The new objective and policy are:

#### ***14.2.12 Objective – Compatibility with Industrial activities***

*a. New residential development is not adversely affected by noise generated from industrial activities and the development does not affect the operation of industrial activities within industrial zones.*

<sup>5</sup> The National Planning Standards defines a 'Town Centre', which PC14 rezones the commercial area of Hornby to, as follows - *Areas used predominantly for:*

- *in smaller urban areas, a range of commercial, community, recreational and residential activities.*
- *in larger urban areas, a range of commercial, community, recreational and residential activities that service the needs of the immediate and neighbouring suburbs.*

**14.2.12.1 Policy – Managing effects on industrial activities**

**a. Restrict new residential development of three or more storeys within proximity to industrial zoned sites where it would give rise to reverse sensitivity effects on industrial activities and/or adversely affect the health and safety of residents, unless mitigation sufficiently addresses the effects.**

- 2.39 As noted above in **paragraph 2.31(c)**, the RII-QM is identified on the planning maps as a 40m strip (or buffer) that extends over residential zones from an industrial zone boundary. Where the industrial / residential zone interface occurs (as identified by the RII-QM), the requirements of the RII-QM are delivered through a restriction applied through a Built Form Standard / Rule 14.6.2.1.c which specifies that residential buildings in the RII-QM area cannot exceed 7m above ground level or 2-storeys, whichever is the lesser. Where this standard is not complied with, a discretionary activity resource consent must be sought in accordance with Rule 14.6.1.4.a.D7 (which PC14 incorrectly refers to as Rule 14.6.2.1.d, rather than 14.6.2.1.c).
- 2.40 The genesis of the proposed RII-QM is outlined and assessed in Section 6.22 of the s32 Evaluation as follows:

***Issue** - The result of applying MDRS means that there is potential for much greater residential density along industrial/residential interfaces than currently enabled in the District Plan. Enabling development up to three storeys may result in currently complying levels of noise from industrial activities exceeding the noise limits. This has the potential to result in nuisance effects on future occupants, and reverse sensitivity effects on industrial activities, potentially affecting their commercial viability. The activities enabled in the industrial general zone (which tend to buffer residential zones from industrial heavy zones) are those that have lesser impacts in terms of noise, traffic movements, odour than compared with land zoned industrial heavy. The industrial chapter in the District Plan includes specific measures to minimise impacts on adjoining residentially zoned land such as setbacks, recession planes, screening of outdoor storage, landscaping and building height. Chapter 6.1 of the District Plan also contains maximum noise limits for both residential zoned land and industrial zoned land. (paragraph 6.22.2).*

...

***Reason the area is subject to a qualifying matter (s77J (3)(a)(i))** - As set out above, there is potential for much greater residential density along industrial/residential interfaces under MDRS than currently enabled in the District Plan. This could result in nuisance effects on future residential occupants, and reverse sensitivity effects on industrially zoned land, particularly with respect to noise. The noise limits within the District Plan are determined by the zoning of the receiving activity and therefore noise generated in any of the industrial zones when received at a residential zoned property are required to comply with the residential noise limits. MDRS enables residential dwellings to be constructed up to three storeys in height compared to the two storeys permitted in the current Plan, although currently it is predominantly single level dwellings at the interface with industrially zoned land. The greater development potential may mean that the third storey of new dwellings ‘overlook’ industrial activities to a greater extent, and do not acoustically benefit from the screening of typical boundary fences, or intervening buildings. Additionally, as NZS6802:2008 requires assessment of noise compliance at 1.2 – 1.5 metres*



above any floor level of interest, there may be compliance locations created which receive higher noise levels than in the current situation, and this may result in currently complying levels of noise from industrial activities exceeding the noise limits. It is noted that changes to the industrial zone rules is outside scope of this IPI and would require a separate future plan change. (paragraph 6.22.8).

**Reason the qualifying matter is incompatible with the level of development permitted (s77J (3)(a)(ii))** – PC14 will encourage redevelopment at a rate which is currently not experienced. Three storey residential development abutting industrially zoned land has the potential to generate reverse sensitivity effects on industrial activities, potentially affecting their commercial viability. The District Plan currently permits residential development up to two storeys whereas the MDRS provides for development up to three storeys. Changes to subdivision controls through MDRS also mean that there cannot be any minimum allotment size around existing or proposed dwellings. This means there is potential for much greater density along industrial/residential interfaces than currently possible. This has the potential to unduly constrain industrial activities that would comply with the District Plan noise limits as they are currently, however may no longer comply due to compliance locations created which receive higher noise levels. There is potential for noise disturbance effects at the three storey level and associated reverse sensitivity effects on industrial activities. (paragraph 6.22.9).

**Impact of lesser enablement under the proposed qualifying matter (s77J (3)(b))** - The impact that limiting development capacity, building height, or density (as relevant) will have on the provision of development capacity is set out in Section 2.3, Table 6 of this report. Note it is unlikely that apartments will be established in these locations, and therefore this qualifying matter may only impact one floor which could impact the number of bedrooms, and unit typology rather than number of units. .... (paragraph 6.22.10).

2.41 The points to note from the above, in relation to the site-specific issue of interest to Ravensdown, is that:

- (a) The s32 Evaluation, while recognising a range of potential nuisance effects on future residential occupants, and reverse sensitivity effects on industrially zoned land, proceeds to recommend the RII-QM based on noise considerations only.
- (b) The s32 Evaluation has only considered potential noise effects from industrial activities in industrial zones on the MDRS, not the HRZ.
- (c) It seems that the s32 Evaluation, and associated technical assessment, did not consider the effects of intensified residential zones adjoining an IHZ. Rather the evaluation seems to focus on the IGZ / residential zone interface on the basis that the IGZ “tend to buffer residential zones from industrial heavy zones” (paragraph 6.22.2 of the s32 Evaluation).

### **Issues Arising from PC14 for Ravensdown’s Christchurch Works**

2.42 Ravensdown, as outlined in the previous sections of this submission, opposes PC14’s proposed rezoning, from RSZ to HRZ, of land located to the southwest and south of the Christchurch Works (i.e., the area outlined in red in **Figure 2** above).

- 2.43 Ravensdown's Christchurch Works, which commenced operating at its site in Hornby 100 years ago when the area was rural, rather than urban, in nature, is appropriately located within an IHZ under the District Plan. This zoning reflects the nature of the industrial operations that are associated with the Christchurch Works. Also, this zoning recognises that industrial activities in the IHZ can generate potential significant effects, including noise, odour, heavy traffic movements and effects associated with the presence of hazardous substances, which means that more sensitive activities should be separated from this zone (**Policy 16.2.1.3** and **Objective 16.2.3** and **Policy 16.2.3.2**). There are also potential effects from heavy industrial activities associated with activities controlled by CRC, including, but not limited to, discharges to air.
- 2.44 However, while the policy framework of the District Plan (and subsequent rules) recognise the need to separate sensitive activities, including residential activities, from heavy industrial activities appropriately located in an IHZ (as is the case with the Christchurch Works), Ravensdown acknowledges that due to the nature of the past development in Hornby, existing residential development (and associated zoning) is present on the land located to south of the Christchurch Works. This fact does not mean that further residential intensification of this area, beyond that which is currently provided for, should be encouraged, let alone facilitated, by PC14.
- 2.45 In relation to the proposed changes to the District Plan arising from PC14 in relation to the area of land to southwest and south of the Christchurch Works (as outlined in red in **Figure 2** above), Ravensdown considers that:
- (a) The proposed rezoning to HRZ does not recognise that in this location the proposed HRZ adjoins an IHZ, not an IGZ. In fact, contrary to the comment contained in the s32 Evaluation, as noted above in **paragraph 2.40**, an IGZ buffer is not associated with the southern edge of the IHZ associated with the Christchurch Works.
  - (b) While the proposed HRZ rezoning aims to deliver on the residential intensification requirements of the RMA-EHS and NPS-UD, the proposal elevates the risks associated with incompatible activities being located near each other, particularly given the change from predominantly single level residential units per site, to multiple residential units, including apartments, up to 4-storeys in height for permitted development, or 6-storeys through a consent pathway (i.e., meaning new people will be occupying new residential dwellings). This is not consistent with SD Objective 3.3.14 (now 3.3.15 under PC14) of the District Plan which seeks to minimise incompatible activities, primarily by way of appropriate zoning (as well as other controls).
  - (c) The proposed HRZ rezoning of the area of land located to the southwest and south of the Christchurch Works seems to have been proposed in PC14 solely on the basis of proximity to the Hornby Town Centre consistent with **Objective 14.2.7** and **Policies 14.2.7.1, 14.2.7.2, 14.2.7.4** and **14.2.7.6** of PC14. There is no evidence, that Ravensdown identified within PC14 and associated documents, that PC14 recognised that the proposed HRZ was adjacent to land that was zoned IHZ and which was used for heavy industrial activities (except for application of the RII-QM, as discussed further

below), and therefore rezoning of this area of land to HRZ, rather than MRZ, was not appropriate.

- (d) While Ravensdown generally supports the adoption of a RII-QM at the industrial / residential interface, and the associated height restrictions on permitted residential development to the lesser of 7m or 2-storeys, as outlined in **paragraph 2.41** above, there a number of deficiencies arising from the development of this QM in the context of the Christchurch Works and the proposed HRZ to the southwest and south of the site. The deficiencies include:
- i. Only noise, not other recognised potential effects from industrial activities in industrial zones, was used to develop the buffer or size of the RII-QM.
  - ii. The development of RII-QM was based on an assessment of potential noise effects on the MDRS, not the HRZ which is what is proposed on the land to the south of the Christchurch Works.
  - iii. Also, the development of the RII-QM seems to have focussed on the IGZ / residential zone interface, and therefore did not consider the IHZ / residential zone interface, on the basis that IGZ tends to buffer residential areas from IHZ. There is no IGZ providing a buffer between the Christchurch Works' IHZ zoning on the residential zoning to the southwest and south of the site.

For the above reasons, Ravensdown considers that the extent of the RII-QM, where proposed residential intensification adjoins an IHZ, is not sufficient.

2.46 Given the above issues, Ravensdown considers that amendments to PC14, for the reasons outlined below, are required:

- (a) Rezoning of the land to the southwest and south of the Christchurch Works (as outlined in red in **Figure 2** of this submission) is not consistent with SD Objective 3.3.14 (now 3.3.15 under PC14) of the District Plan, nor does align with the policy framework of the IHZ which acknowledges the potential for both reverse sensitivity issues and a range of potential effects on more sensitive activities adjoining such sites. For this reason, Ravensdown considers that the area of land, which is of concern, should be rezoned MRZ. This zoning is consistent with the proposed rezoning of the land to the south and east of the land which is generally located to the south of the Christchurch Works.
- (b) In recognition of the nature of the IHZ, and the activities that lawfully can occur in that zone, retain a restriction on development of the MRZ land, where it adjoins industrially zoned land, whereby permitted residential development must be the lesser of 7m or 2-storeys. This restriction could be applied by way of the proposed RII-QM, or alternatively by way of a rule that specifies this requirement if residential development is being sought within a specified buffer area, as discussed below, of an industrial zone.
- (c) If the restriction proposed above is to be by way of a rule, given that the proposed PC14 RII-QM was developed on the basis of potential noise effects on residential development, then a rule requiring acoustic installation to be installed in all residential

developments, within the specified buffer area from industrial zones, should also be included in the District Plan.

- (d) In the absence of any specific technical evidence from Council that addresses the potential effects, not just noise effects, from industrial activities in an IHZ (rather than just an IGZ), and where an IGZ does not buffer an IHZ from a residential zone, Ravensdown proposes that the 'buffer area' restriction that applies at the IHZ / residential interface should extend for 240m from the zone boundary. This proposed buffer accommodates PC14's proposed 40m noise related IGZ / residential zone 'buffer', plus provision of an additional 200m to reflect the approximate depth of parts of the IGZ in Hornby where it adjoins an IHZ (i.e., to the northwest and north of Ravensdown's site). Thus, this approach incorporates a IGZ buffer between IHZ and residential zones that seems to have been envisaged in the s32 Evaluation. Also, this extent of buffer generally reflects the extent of off-site locations where Ravensdown carries out monitoring and survey work under Consent CRC080001, and where windows of residential dwellings has been replaced, as required by the conditions of Consent CRC080001, due to etching of glass.

### Relief Sought

2.47 For the reasons outlined above, Ravensdown requests amendments to PC14 due to the proposed residential intensification of land to the southwest and south of the Christchurch Works, as proposed by PC14, to ensure that potential conflicts between incompatible activities, in this instance heavy industrial and intensive residential development, are minimised and avoided (as required by SD Objective 3.3.14 (3.3.15 under PC14)).

2.48 As outlined in **paragraph 2.46** above, Ravensdown requests the following amendments to PC14:

- (a) Amend proposed Objective 14.2.12 so that it recognises the full suite of potential effects from industrial activities on new residential development, not just noise.
- (b) Retain Policy 14.2.12.1 as notified. This policy effectively reflects the resource management approach that should apply where potential new residential development adjoins industrial activities appropriately located in an industrial zone.
- (c) Rezoning of the land to the south of the Christchurch Works (as outlined in red in **Figure 2** of this submission) from HRZ to MRZ.
- (d) Provide an industrial / residential interface restriction:
- i. Either through the RII-QM or a rule framework, whereby permitted residential development within a 'buffer area' between the industrial / residential interface, must be the lesser of 7m or 2-storeys; and
  - ii. If the proposed industrial / residential interface restrictions are to be provided by way of a rule, then include a rule requiring acoustic installation to be installed in all residential developments, within the specified buffer area from industrial zones.

- (e) Where an IHZ immediately adjoins a residential zone, apply a 240m IHZ / residential interface buffer from the IHZ boundary over adjoining residential zones.
- 2.49 Ravensdown also requests any **consequential amendments** arising from the above specific submission points and the relief sought.

### 3. CONCLUSION

- 3.1 Given the requirements arising from the NPS-UD and the RMA-EHS, Ravensdown generally supports the aim of PC14 to provide for more housing choice and greater opportunities for business development in Christchurch city.
- 3.2 However, Ravensdown opposes the proposed application of the HRZ, and associated PC14 provisions, that will enable high density residential development on land located to the southwest and south of the Christchurch Works (as shown in **Figure 2**). In relation to the provisions that Ravensdown has raised concerns about, and thus opposed, these provisions require amendment because, without amendment, those provisions:
- (a) will not promote sustainable management of resources and will not achieve the purpose of the RMA;
  - (b) is contrary to Part 2 and other provisions of the RMA;
  - (c) will not enable the social and economic well-being of the community within the suburb of Hornby and thus within Christchurch city;
  - (d) will not meet the reasonably foreseeable needs of future generations;
  - (e) will not achieve integrated management of the effects of the use, development or protection of the city's urban environment, or the city's land resources;
  - (f) will not enable the efficient use and development of Ravensdown's assets and operations at its Christchurch Works, and of those resources which are dependent on, or benefit from, Ravensdown's assets and operations;
  - (g) are not the most appropriate way to achieve the objectives, particularly those relating to the IHZ and managing incompatible activities; and
  - (h) do not represent the most appropriate means of exercising Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.
- 3.3 Ravensdown could not gain an advantage in trade competition through this submission.
- 3.4 Ravensdown wishes **to be heard** in support of its submissions.
- 3.5 If others are making a similar submission, Ravensdown will consider presenting a joint case with them at the hearing.

**Date:** 5 May 2023



.....  
Jane Whyte

**Director**

Authorised to sign this submission on behalf of Ravensdown Limited

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

## Submitter Details

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

**First name:** Harvey **Last name:** Armstrong

**Preferred method of contact** Email

**Postal address:** 31 Glenelg Spur

**Suburb:** Hillsborough

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8022

**Email:** h.armstrong@xtra.co.nz

**Daytime Phone:** 0274-327-518

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 44.1

- Support
- Oppose
- Seek Amendment

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

75 Alderson Ave 27.759Ha. This land is sandwiched between public open space reserves(Montgomery Spur Reserve) and the city urban (LH)boundary. Allow rezoning of this to land to Living Hills zoning or create a special zoning for larger residential sites of say 2500 to 10000 m2

Currently this site is uneconomic for agriculture and supports a few cattle, rabbits and weeds and is very drought prone. The adjoining Living Hills zoned land is not viable to develop without the rezoning of the rural land 75 Alderson Ave (which is above).

It is envisaged that any development would cover only part of the area with large planted areas along the boundaries and down water courses that would encourage biodiversity and link with the adjoining CCC reserve. The design layout would be developed in conjunction with the Council and would create significant attractive residential sites and public amenities.

**My submission is that**

Please see detailed submission attached.

With the release of the National Policy Statement 2020 released May 2022 which appears to be legislation to increase residential densities and better utilise land in urban areas that the Council should review small non-viable residual parcels of rural land. This land should be rationalised into areas for residential development of various lot sizes.

**Original Submitter:****Original Point:****Points:** 44.2

- 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***

75 Alderson Ave 27.759Ha. Allow rezoning of this to land to Living Hills zoning or create a special zoning for larger block residential sites of 2500 to 10000 m2.

Any residential development would require onsite water storage.

This hill, Montgomery Spur, has had several large fires requiring all types of firefighting equipment including helicopters.

Development of this lot would provide good access and water storage tanks and help defend any fire on the large adjoining Council reserves

This hill property has no significant earthquake issues from high ground rock fall areas above. No damage was inflicted on farm access tracks from earthquake events.

Existing water courses operate satisfactorily but would be improved with peak flows being reduced and planting /armouring / culverting.

**My submission is that**

That parts of the lower Port Hills that are open land owners should be encouraged to develop good road access and water storage facilities on their properties for firefighting.

This could be anything from created vehicle tracks and collection ponds/dams to low density housing where every site has storage tanks and drive on access

**Original Submitter:**



**Original Point:****Points:** 44.3

- 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***

75 Alderson Ave 27.759Ha. Allow rezoning of this to land to Living Hills zoning or create a special zoning for larger block residential sites of 2500 to 10000 m2 .

Depending on the density of residential development allowed roading could be a ROW/ Private Road serving a few larger blocks, or a full public road with associated amenities.

The roading dimensions will dictate the extent of earthworks and retaining structures required. Currently there is a farm access track formations which allows slow vehicle access through the LH and Rural land which would pretty much be along the alignment of any formal roading for residential lots.

Public Transport-This block at its closest point is 100metres from the Port Hills Road bus route but unfortunately it is 100metres below! From the centre of the block, assuming the existing route of farm tracks were followed through to the existing Alderson Ave then Port Hills Road, it would be approximately 1200 metres.

The middle of this block is 4.7km to the Cathedral and must be one of the largest undeveloped blocks close to the CBD. Any residential development would provide increased patronage for bus route along Port Hills Road and Centaurus Road

It should be noted that this property adjoins Montgomery Spur reserve which is an ever increasing walking, mountain bike area which could be easily accessed from the 75 Alderson Ave site.

Should residential sites be established on this site it is highly like that resident from the area could cycle to and from the CBD (approx. 5kms)

At some time in the future it is possible we could see rail passenger services resurrected using the Woolston yard site.

**My submission is that**

The Qualifying Matter 'Low Public Transport Accessibility', which covers much of the Residential Hills, and Rural Hills zones, is not just. Similar distance to public transport can be found in many "Flat land "city properties.

**Original Submitter:****Original Point:****Points:** 44.4

- Support
- Oppose
- Seek Amendment

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

75 Alderson Ave 27.759Ha. Allow rezoning of this to land to Living Hills zoning or create a special zoning for larger block residential sites of 2500 to 10000 m2 .

This property is a north facing easy sloping land zoned Rural. The geology consists of Port Hills rock covered with thin layer of loess / top soil. Soils are low nutrient and drought prone and are only suitable for low density grazing (which is not viable).

The land aspect would allow the easy siting of residential building with excellent views of the city and plains.

**My submission is that**

The council planning unbiasedly review all existing vacant land closest to the CBD as to whether it is suitable for residential development. It is concerning to see the residential housing sprawl being carried out on good versatile soils at considerable distance from

the CBD. These sites all require expensive extension to city infrastructure and services. The environmental damage is being further accelerated by the creation of significant satellite towns like Lincoln, Rolleston etc.

**Original Submitter:**

**Original Point:**

**Points:** 44.5

- Support
- Oppose
- Seek Amendment

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

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

75 Alderson Ave 27.759Ha. That the designation of **Outstanding Natural Landscape** be removed from this block. This lot is only a small sliver of land sandwiched below the Montgomery Reserve and the LH boundary. This designation was first placed on this land after environment court decision 2003 which declined consent for a 220 lot residential subdivision and reserves which affected the entire spur over three land owner's properties. The court was advised that the Spurs outstanding landscape quality "is ecologically significant for silver tussock".

All the land below the reserve (in private ownership) and has no indigenous fauna and that the vegetation there primarily consists of exotic grasses and brush weeds (bone seed, gorse, broom and blackberry).

It is ironic that within two years after that decision the Council under some secretive deal acquired the vast majority of the spur (330 acres – 132HA) for a reserve. This land contains all of the silver tussock areas.

It should be noted that there is no public access across this private land. Basically at present access to the Council reserve can only be achieved from Rapaki Track Road or Avoca Valley Road.

**My submission is that**

My submission is that any un-measured, designation placed on private land be reviewed

**Original Submitter:**

**Original Point:**

**Points:** 44.6

- Support
- Oppose
- Seek Amendment

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

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

75 Alderson Ave 27.759Ha. This land is sandwiched between public open space reserves (Montgomery Spur Reserve) and the city urban (LH) boundary. Allow rezoning of this to land to Living Hills zoning or create a special zoning for larger block residential sites of 2500 to 10000 m2.

We have owned this farm land for some 35years and during this time we have seen and taken part in many hearings about the status and zoning of this this land.

There is no doubt that it is a changing landscape the most recent being:

- The acquisition of the Montgomery Reserve and development of mountain bike tracks and sheep grazing only.
- Other neighbours have had earthworks carried out to provide access and fire protection.
- Several small structures have also appeared.
- The brush weed bone seed has increased coverage of the lower slopes.
- The removal of several houses below the Rocky Point reservoir were red stickered following the earthquake

**My submission is that**

small parcels of rural land that are not viable to farm on the Urban Boundary be reviewed for possible residential development. There is no

desire to see unrestrained greenfield development where no natural or public land constraints are present.( i.e. waterways, reserves, natural hazard etc.).The Council should encourage the efficient, environmental sound basis and best use of land throughout and on the city urban boundary.

---

#### Attached Documents

File
Harvey Armstrong PC14 submission attachment
Harvey Armstrong PC14 submission email

**Cui, Aviva**

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**From:** DutyPlanner  
**Sent:** Monday, 8 May 2023 12:57 pm  
**To:** Engagement  
**Subject:** FW: Address: N/A  
**Attachments:** CCC PC14 Housing and Business1.docx

---

**From:** H.Armstrong <H.Armstrong@xtra.co.nz>  
**Sent:** Monday, 8 May 2023 12:44 pm  
**To:** DutyPlanner <DutyPlanner@ccc.govt.nz>  
**Subject:** RE: Address: N/A

Hi  
 Could you please open the attachment which contains a number of submissions I wish to make about future development to Christchurch City.  
 I appreciate that this PC 14 is primarily about increasing density of residences within the existing city but the bottom line is a requirement to efficiently provide housing for future population growth .  
 That is what I hope to achieve with my submissions.  
 Many thanks for your assistance and patients

Harvey Armstrong  
 0274327518

---

**From:** DutyPlanner [<mailto:DutyPlanner@ccc.govt.nz>]  
**Sent:** Monday, 1 May 2023 3:28 PM  
**To:** [h.armstrong@xtra.co.nz](mailto:h.armstrong@xtra.co.nz)  
**Subject:** RE: Address: N/A

Hi Harvey,  
 As I mentioned on the phone, if you continue to have issues in making a submission using the online form I recommend that you contact via email: [engagement@ccc.govt.nz](mailto:engagement@ccc.govt.nz) or phone: 03 941 6886  
 Regards,

Francis  
 Duty Planner




---

**From:** Walsh, Mari <[Mari.Walsh@ccc.govt.nz](mailto:Mari.Walsh@ccc.govt.nz)>  
**Sent:** Monday, 1 May 2023 2:46 PM  
**To:** DutyPlanner <[DutyPlanner@ccc.govt.nz](mailto:DutyPlanner@ccc.govt.nz)>  
**Subject:** Address: N/A

<b>Name:</b>	Harvey Armstrong
<b>Address:</b>	
<b>Phone work / home:</b>	
<b>Phone mobile</b>	0274-327-518
<b>Email:</b>	<a href="mailto:h.armstrong@xtra.co.nz">h.armstrong@xtra.co.nz</a>

<b>Other Council Staff Contacted:</b>	
<b>Question summary?</b>	It is in regards to district Plan 14
<b>Available within the next 6 hours for contact?</b>	YES <u>OR</u> No - best alternative e time to call is: Anytime
<b>Any additional information</b>	He is trying to do a 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.

H Armstrong

31 Glenelg Spur

8/05/2023

Hillsborough

Christchurch 8022

Christchurch City Council

Planning Section

### **CCC PC14 Housing and Business**

My Submissions are:

Chapter 3 Strategic Directions

My submission is that

With the release of the National Policy Statement 2020 released May 2022 which appears to be legislation to increase residential densities and better utilise land in urban areas that the Council should review small non-viable residual parcels of rural land. This land should be rationalised into areas for residential development of various lot sizes.

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

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Currently this site is uneconomic for agriculture and supports a few cattle, rabbits and weeds and is very drought prone. The adjoining Living Hills zoned land is not viable to develop without the rezoning of the rural land 75 Alderson Ave (which is above).

It is envisaged that any development would cover only part of the area with large planted areas along the boundaries and down water courses that would encourage biodiversity and link with the adjoining CCC reserve. The design layout would be developed in conjunction with the Council and would create significant attractive residential sites and public amenities.

## Chapter 5 Natural Hazards

### **My submission is that**

That parts of the lower Port Hills that are open land owners should be encouraged to develop good road access and water storage facilities on their properties for firefighting.

This could be anything from created vehicle tracks and collection ponds/dams to low density housing where every site has storage tanks and drive on access

### **I seek the following decision from the Council**

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Development of this lot would provide good access and water storage tanks and help defend any fire on the large adjoining Council reserves

This hill property has no significant earthquake issues from high ground rock fall areas above. No damage was inflicted on farm access tracks from earthquake events.

Existing water courses operate satisfactorily but would be improved with peak flows being reduced and planting /armouring / culverting.

## Chapter 7 Transport

**My submission is that** The Qualifying Matter 'Low Public Transport Accessibility', which covers much of the Residential Hills, and Rural Hills zones, is not just. Similar distance to public transport can be found in many "Flat land "city properties.

### **I seek the following decision from the Council**

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The middle of this block is 4.7km to the Cathedral and must be one of the largest undeveloped blocks close to the CBD. Any residential development would provide increased patronage for bus route along Port Hills Road and Centaurus Road

It should be noted that this property adjoins Montgomery Spur reserve which is an ever increasing walking, mountain bike area which could be easily accessed from the 75 Alderson Ave site.

Should residential sites be established on this site it is highly like that resident from the area could cycle to and from the CBD (approx. 5kms)

At some time in the future it is possible we could see rail passenger services resurrected using the Woolston yard site.

## Chapter 8 Subdivision, development and earthworks.

**My submission is that;** the council planning unbiasedly review all existing vacant land closest to the CBD as to whether it is suitable for residential development. It is concerning to see the residential housing sprawl being carried out on good versatile soils at considerable distance from the CBD. These sites all require expensive extension to city infrastructure and services. The environmental damage is being further accelerated by the creation of significant satellite towns like Lincoln, Rolleston etc.

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The land aspect would allow the easy siting of residential building with excellent views of the city and plains.

Chapter 9 -Natural and Cultural Heritage and Chapter 10 – Designation and Heritage Orders

**My submission is that any un-measured, designation placed on private land be reviewed.**

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

75 Alderson Ave 27.759Ha. That the designation of **Outstanding Natural Landscape** be removed from this block. This lot is only a small sliver of land sandwiched below the Montgomery Reserve and the LH boundary. This designation was first placed on this land after environment court decision 2003 which declined consent for a 220 lot residential subdivision and reserves which affected the entire spur over three land owner's properties. The court was advised that the Spurs outstanding landscape quality "is ecologically significant for silver tussock".

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It is ironic that within two years after that decision the Council under some secretive deal acquired the vast majority of the spur (330 acres – 132HA) for a reserve. This land contains all of the silver tussock areas.

It should be noted that there is no public access across this private land. Basically at present access to the Council reserve can only be achieved from Rapaki Track Road or Avoca Valley Road.

Chapter 18 Open Space Planning Map ( could also apply to Chapter 14 and 17),

**My submission is that;** small parcels of rural land that are not viable to farm on the Urban Boundary be reviewed for possible residential development. There is no desire to see unrestrained greenfield development where no natural or public land constraints are present.( i.e. waterways, reserves, natural hazard etc.).The Council should encourage the

efficient, environmental sound basis and best use of land throughout and on the city urban boundary.

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There is no doubt that it is a changing landscape the most recent being:

- The acquisition of the Montgomery Reserve and development of mountain bike tracks and sheep grazing only.
- Other neighbours have had earthworks carried out to provide access and fire protection.
- Several small structures have also appeared.
- The brush weed bone seed has increased coverage of the lower slopes.
- The removal of several houses below the Rocky Point reservoir were red stickered following the earthquake

### **Benefits of Residential Development**

Once again I will state the benefits of allowing residential development of 75 Alderson Ave. If this was agreed it is envisaged that development would progress from Alderson Ave through 80 Alderson Ave Living Hills land and eventually to 75 Alderson Ave areas. There will be opportunities to create interesting reserves in old rock quarries and waterways.

Benefits would include:

- Providing multiple public access points to the CCC reserve above.
- Better utilization of existing city infrastructure currently servicing this area. We hold good evidence from expert witnesses from the Environment Court hearing of underutilized infrastructure.
- Improved recreational opportunities for local residents.
- Increase the viability of existing public transport systems.
- Lower siltation run-off into the Heathcote River catchment.

- Providing excellent stable hill residential sites close to the central city. All would be situated in the 100 – 170m contour range.
- Reduced fire risk and increased access to adjoining properties and reserves for improved damage control.
- Better utilization of poor quality “greenfield land” and there by reducing pressure to develop housing on good versatile soils areas or low lying wet land areas.
- Opportunities for citizens to live in a healthy environment with probably better outcomes with global warming.
- Provide access reserves/ corridors for bird life and encourage bio diversity between the city flat land and port hills.
- Increase CCC rate collection from the area

It is interesting to note that the NPS-UD is part of the urban planning focus of the Urban Growth Agenda. It directs councils to remove overly restrictive planning rules and plan for growth, both up and **out**.

Could you please consider all of the above submissions.

I spent considerable time trying to operate the CCC online submission site and after talking with a Council planner he suggested I submit an email with Word attachment that can be easily transcribed.

I would envisage presenting further info if required at any future hearing.

I thank you for the opportunity to submit to this exercise.

Could you please confirm my submissions have been received and can be processed from the form they have been presented in?

H Armstrong

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

## Submitter Details

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

**First name:** Victoria **Last name:** Berryman

**Preferred method of contact** Email

**Postal address:** 88 Cotswold Avenue

**Suburb:** Bishopdale

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8053

**Email:** victoriaberryman@yahoo.com

**Daytime Phone:** 021752834

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

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

Note to person making submission:

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

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 45.1

- 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***

Ensure the sunlight amendment allows for ground floors to have more sun during the winter. Specifically in Bishopdale, an area with many single-story homes, older homes, which would be severely impacted by not allowing more sun through in the winter. Not only for the warmth of their homes, but the occupants mental health as well.

**My submission is that**

For 6.1A Qualifying Matters in regards to sunlight, the ground floor of any house should be afforded sunlight in the winter. A lot of

housing in Christchurch is single story so and amendment to just allow the first floor of a building sunlight during the winter months doesn't take that amendment far enough. Everyone deserves a warm home, and bulidng medium-high density housing next to an existing, older home, doesn't allow that enough with this amendment.

---

Attached Documents

File
No records to display.

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

## Submitter Details

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

**First name:** Robert **Last name:** Black

**Preferred method of contact** Email

**Postal address:** 11A Garden Road

**Suburb:** Merivale

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8014

**Email:** rob.black@xtra.co.nz

**Daytime Phone:** 021505816

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:

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 46.1

- Support
- Oppose
- Seek Amendment

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

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

Include the Flood Management Area, or at least that part of the FMA in the catchment my property is in, as a Qualifying Matter to exclude MDRS rules from applying.

Consider infrastructure limitations, and map areas as qualifying matters where infrastructure is not sufficient for intensive development.

List TC3 land as a Qualifying Matter. As a default, that land should not be intensively developed. It is appropriate to obtain resource consent to

**My submission is that**

- I understand from a newspaper article that the area around our residence is one of the two lowest parts of Christchurch (the other being the Flockton Basin) in respect of being at risk for one in 50, one in 100 and one in 200 year flood events.
- This aligns with my experience in the area. In recent years we have had issues such as:
  1. Flooding, with the Wairarapa stream having risen to the bottom of bridges several times. If it broke its banks it would flood Queens Avenue and Garden Road.
  2. Stormwater systems have clearly been at capacity, with some overflow.
  3. In recent flooding events a neighbouring section has been almost entirely covered in surface water flooding.
- As night follows day, a site with intensive housing development generates more stormwater, due to increased hardstand area (three houses compared with one), and reduced area available for landscaping and lawn that slows stormwater transfer to the public system.
- This area is an identified Flood Management Area in the District Plan. In particular, this means that new builds sit significantly higher than adjacent older homes. These older homes will be particularly at risk from future flooding if housing intensification is allowed to occur, as the increased stormwater run-off will exacerbate existing flooding issues.
- 
- I see that the CCC has already introduced infrastructure shortcomings as a Qualifying Matter as part of PC14. I support this approach wholeheartedly, but consider that its application needs to be taken further.
- In this area, a lot of the local infrastructure was replaced after the earthquake. However, I understand that was done on the basis of the then expected density, not the default proposed here of three dwellings for every site. I do not believe it has the capacity to serve this higher density. It is not unrealistic to consider that this intensification could occur in the short term; within 20 metres of our house there are two bare land sections, one house awaiting demolition and another planned for this. Nine extra houses could be built within a stones throw.
- The soil here is TC3, and the damage that the area obtained following the earthquake was significant. In particular:
  1. The vast majority of houses in this locality were replaced after the earthquake – it was one of the worst hit areas in Christchurch and I am sure it had the highest infrastructure replacement and house replacement cost per square metre of anywhere.
  2. The subsoil liquefies readily. We had one of Christchurch's highest accelerations from the February earthquake measured by a seismograph at our home – .88g. As a result of that, we had a GNS scientist write to us to enquire whether there was any reason for this exceptional reading in relation to the placing of a seismograph. There was no reason; it was just the force of acceleration in this area (possibly due to a "basin" underneath the surface – a trampoline effect).
  3. A civil engineer working on the new sewer system down our street remarked that if this land had been in eastern side of Christchurch then it would have been red zoned due to the extensive land damage.
  4. When replacing the sewer main they were working nearly 2 m down in liquid soil.
- Power: I understand that a power company was already struggling to provide power for a recent subdivision of just one section. In particular I was told the landowner requested three-phase power but connection was not possible. My understanding of how that resolved is that power was provided to the new site, but with difficulty. I wonder if the implications on power companies have been considered as part of these qualifying matter

- The reasons for the above damage have not changed. Any future earthquake could result in the same level of damage, to both homes, infrastructure and land. Houses will tip and sink.

**Original Submitter:**

**Original Point:**

**Points:** 46.2

- 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***

Amend the recession planes to 40 degrees or less.

Exclude Rule 5.4.1.3 from applying to recession planes under the MDRS.

**My submission is that**

- I know that the CCC has introduced a city wide “access to sunlight” recession plane, which I am in full support of. However, I consider that it needs to go further than the current proposal. This is for two reasons:
  1. Recession plane on southern side (i.e. neighbours northern boundary) needs to allow more sunlight; and
  2. The issue of where floor level commences for the purpose of calculating recession planes needs to be considered.
- Firstly, the southern recession plane in the sections in this area this area previously was around 30 degrees. I appreciate that the Council has reduced the MDRS recession plane (60 degrees) to 50 degrees in light of Christchurch’s more limited access to sunlight, but I consider this should be 40 degrees or less to better protect homes access to sun. This is particularly relevant at a time where emphasis is put on “healthy homes” – access to sunlight (and the warmth and dryness it brings) should be protected. We have a large new home along our North built to 29 degrees (about 36 degrees for a large stairwell) Loss of sun in midwinter is particularly noticeable but acceptable because it is only for a few weeks. Any more loss resulting from a 50 degree standard would most seriously affect our heating requirement and sunlight. If a new 50 degree build appeared in front of us (and fortunately that is very unlikely) we would have to move: Too cold , too damp. 50 degrees is simply not fair or equitable in Christchurch.
- As outlined above in this submission, due to the flooding risk in this area, new builds are issued a minimum floor level that is significantly higher than the existing housing stock.
- Rule 5.4.1.3 of the District Plan includes an exemption for daylight recession planes in the Flood Management Area (FMA). My understanding of how that rule operates is that where the floor level of a new building is required to be high (due to being in the FMA and so at risk of flooding) the “floor level” for the purposes of the calculation of recession planes is taken to be the minimum floor level, not actual ground level. This rule is clearly advantageous to the new build (as it allows for more build height), but to the significant detriment of the neighbours, particularly, where those neighbours have an existing house at (or about) ground level. The rule was introduced by way of submission on the District Plan (rather than proposed by Council at the initial stage) which resulted in it slipping in fairly unopposed, with the effected public having no realistic chance of being aware of the change, or objecting.
- I have major concerns as to how this will play out with the new MDRS rules. There is no reference that I can see excluding the new height limits and recession rules from Rule 5.4.1.3. So, even though PC14 proposes reduced recession plane limits in Christchurch, how those reductions apply will be less in practice in FMA than in other areas of the city.

Attached Documents

File
Robert Black Submission PC14



## SUBMISSION ON PC14

Contact details:

Email: [rob.black@xtra.co.nz](mailto:rob.black@xtra.co.nz)

Phone: 021 505 816

Please also include Jamie Robinson on any correspondence arising from this submission:

Email: [Jamie.Robinson@duncancotterill.com](mailto:Jamie.Robinson@duncancotterill.com)

### Proposed Housing and Business Choice Plan Change

- 1 My name is Robert Black. I reside at 11A Garden Road, Merivale. I have lived at this property for 43 years. Three years prior to the earthquakes, we subdivided the property, building a new home on the front half. This 3 year old home was destroyed in the February earthquake. We rebuilt the house. As part of the rebuilding process I became acquainted with the District Plan rules as they relate to floor levels and recession planes, and can speak to how those rules and changes have impacted my enjoyment of my home. This is explained further in subsequent sections.
- 2 I have completed the submission form as required by CCC, but have also included all my submission points and reasoning in this document, as the submission document is rigid in its sections.
- 3 Generally, I am in support of housing intensification in appropriate areas of Christchurch. However, given the knowledge that we have of the city following the earthquakes, I consider it is critical that we are strategic with which areas can and should support intensification. I consider in order to do this successfully, some changes or extensions to the proposed Qualifying Matters are required.

### Flood issues

- 4 I understand from a newspaper article that the area around our residence is one of the two lowest parts of Christchurch (the other being the Flockton Basin) in respect of being at risk for one in 50, one in 100 and one in 200 year flood events.
- 5 This aligns with my experience in the area. In recent years we have had issues such as:
  - 5.1 Flooding, with the Wairarapa stream having risen to the bottom of bridges several times. If it broke its banks it would flood Queens Avenue and Garden Road.
  - 5.2 Stormwater systems have clearly been at capacity, with some overflow.
  - 5.3 In recent flooding events a neighbouring section has been almost entirely covered in surface water flooding.
- 6 As night follows day, a site with intensive housing development generates more stormwater, due to increased hardstand area (three houses compared with one), and reduced area available for landscaping and lawn that slows stormwater transfer to the public system.
- 7 This area is an identified Flood Management Area in the District Plan. In particular, this means that new builds sit significantly higher than adjacent older homes. These older homes will be particularly at risk from future flooding if housing intensification is allowed to occur, as the increased stormwater run-off will exacerbate existing flooding issues.

### Infrastructure

- 8 I see that the CCC has already introduced infrastructure shortcomings as a Qualifying Matter as part of PC14. I support this approach wholeheartedly, but consider that its application needs to be taken further.
- 9 In this area, a lot of the local infrastructure was replaced after the earthquake. However, I understand that was done on the basis of the then expected density, not the default proposed here of three dwellings for every site. I do not believe it has the capacity to serve this higher density. It is not unrealistic to consider that this intensification could occur in the short term; within 20 metres of our house there are two bare land sections, one house awaiting demolition and another planned for this. Nine extra houses could be built within a stone's throw.
- 10 The soil here is TC3, and the damage that the area obtained following the earthquake was significant. In particular:
- 10.1 The vast majority of houses in this locality were replaced after the earthquake – it was one of the worst hit areas in Christchurch and I am sure it had the highest infrastructure replacement and house replacement cost per square metre of anywhere.
- 10.2 The subsoil liquefies readily. We had one of Christchurch's highest accelerations from the February earthquake measured by a seismograph at our home – .88g. As a result of that, we had a GNS scientist write to us to enquire whether there was any reason for this exceptional reading in relation to the placing of a seismograph. There was no reason; it was just the force of acceleration in this area (possibly due to a "basin" underneath the surface – a trampoline effect).
- 10.3 A civil engineer working on the new sewer system down our street remarked that if this land had been in eastern side of Christchurch then it would have been red zoned due to the extensive land damage.
- 10.4 When replacing the sewer main they were working nearly 2 m down in liquid soil.
- 11 The reasons for the above damage have not changed. Any future earthquake could result in the same level of damage, to both homes, infrastructure and land. Houses will tip and sink.
- 12 Power: I understand that a power company was already struggling to provide power for a recent subdivision of just one section. In particular I was told the landowner requested three-phase power but connection was not possible. My understanding of how that resolved is that power was provided to the new site, but with difficulty. I wonder if the implications on power companies have been considered as part of these qualifying matters?

### Recession Planes

- 13 I know that the CCC has introduced a city wide "access to sunlight" recession plane, which I am in full support of. However, I consider that it needs to go further than the current proposal. This is for two reasons:
- 13.1 Recession plane on southern side (i.e. neighbour's northern boundary) needs to allow more sunlight; and
- 13.2 The issue of where floor level commences for the purpose of calculating recession planes needs to be considered.
- 14 Firstly, the southern recession plane in the sections in this area this area previously was around 30 degrees. I appreciate that the Council has reduced the MDRS recession plane (60 degrees) to 50 degrees in light of Christchurch's more limited access to sunlight, but I consider this should be 40 degrees or less to better protect homes' access to sun. This is particularly relevant at a time where emphasis is put on "healthy homes" – access to sunlight (and the warmth and dryness it brings) should be protected. We have a large new home along

our North built to 29 degrees (about 36 degrees for a large stairwell) Loss of sun in midwinter is particularly noticeable but acceptable because it is only for a few weeks. Any more loss resulting from a 50 degree standard would most seriously affect our heating requirement and sunlight. If a new 50 degree build appeared in front of us (and fortunately that is very unlikely) we would have to move: Too cold , too damp. 50 degrees is simply not fair or equitable in Christchurch.

- 15 As outlined above in this submission, due to the flooding risk in this area, new builds are issued a minimum floor level that is significantly higher than the existing housing stock.
- 16 Rule 5.4.1.3 of the District Plan includes an exemption for daylight recession planes in the Flood Management Area (FMA). My understanding of how that rule operates is that where the floor level of a new building is required to be high (due to being in the FMA and so at risk of flooding) the “floor level” for the purposes of the calculation of recession planes is taken to be the minimum floor level, not actual ground level. This rule is clearly advantageous to the new build (as it allows for more build height), but to the significant detriment of the neighbours, particularly, where those neighbours have an existing house at (or about) ground level. The rule was introduced by way of submission on the District Plan (rather than proposed by Council at the initial stage) which resulted in it slipping in fairly unopposed, with the effected public having no realistic chance of being aware of the change, or objecting.
- 17 I have major concerns as to how this will play out with the new MDRS rules. There is no reference that I can see excluding the new height limits and recession rules from Rule 5.4.1.3. So, even though PC14 proposes reduced recession plane limits in Christchurch, how those reductions apply will be less in practice in FMA than in other areas of the city.

## CONCLUSIONS

- 18 The ability to intensify in this area is inappropriate, and will result in significant adverse effects on surrounding properties. There are valid matters which fall within existing identified qualifying matters which should exclude this area from intensification:
- 18.1 Significant flooding already occurs in wet weather events, and the additional intensification that the MDRS allows will further exacerbate this issue. There is very serious flooding risk in a major event.
- 18.2 The soils in this area were devastated by the Christchurch earthquakes. This is demonstrated partially through the TC3 land category, and was further explored when pipes were replaced.
- 18.3 The infrastructure, particularly storm-water, sewage and power, is not demonstrably up to the standard required for the intensification the MDRS would allow.
- 18.4 The recession planes in Flood Management Areas need to be considered carefully (a much more important factor than density), and the current pathway for a recession plane from the minimum floor level (rather than ground level) needs to be revoked.
- 19 I do not believe that the Council has considered the soil, flood and infrastructure issues in depth in respect of each ‘sub-suburb’, and in particular this area. I believe this work should be done before such drastic rule changes are implemented because of the risk to residents and the risk to Council.

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

## Submitter Details

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

**First name:** jean-michel **Last name:** gelin

**Preferred method of contact** Email

**Postal address:** 205 Waimea Terrace

**Suburb:** Beckenham

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8023

**Email:** gelinjm@gmail.com

**Daytime Phone:** 02041306202

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

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

Note to person making submission:

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

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 47.1

- Support
- Oppose
- Seek Amendment

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

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

Create a character area including Forfar Street to limit the possible height of the new building and the sunlight access for the 1 Storey houses of the street

**My submission is that**

the access to the sunlight is a big concern. I do not agree with the suppression of the recession plan on this

purpose. the proposed changes on the recession plan angles and setback to get equivalent light as in Auckland is the minimum. I own a house 30 forfar street and the current building of a 8m building fully north of my property is considerably reducing the sunlight access. a building of 12m height would be catastrophic and will destroy the beautiful character of the neighbourhood

---

Attached Documents

File
No records to display.

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

## Submitter Details

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

**First name:** Kerry **Last name:** Andrews

**Organisation:** Annex Developments

**Preferred method of contact** Email

**Postal address:** PO Box 1845

**Suburb:**

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8140

**Email:** kerry@planzconsultants.co.nz

### Daytime Phone:

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.

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

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

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

Additional requirements for hearing:

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 48.1

- Support
- Oppose

Seek Amendment

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

*If seeking to make changes to a specific site or sites, please provide the address or identify the area*  
no amendments requested.

**My submission is that**

In support of planning maps 40 and 47 - rezoning The Tannery site at Garlands road from Industrial General to Mixed Use Zone.

**Original Submitter:**

**Original Point:**

**Points:** 48.1

- 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*

add a new clause to proposed policy 15.2.3.2 as follows:

e. To encourage the redevelopment of areas located within a Brownfield Overlay on the planning maps to allow a mix of commercial and residential activities.

**My submission is that**

There are no provisions for Brownfield Overlay within Mixed Use Zone and therefore is not applicable for properties within the Mixed Use Zone.

Attached Documents

File
Plan Change 14 Submission

**SUBMISSION ON A NOTIFIED PROPOSAL FOR A POLICY STATEMENT OR PLAN, CHANGE OR VARIATION  
VIA INTENSIFICATION PLANNING INSTRUMENT (IPI) IN ACCORDANCE WITH SECTION 80F(1)(a),  
RESOURCE MANAGEMENT ACT 1991**

**Submission Plan Change 14 to the Christchurch District Plan (PC14)**

**To:** City Planning Team  
Christchurch City Council (“the Council”)  
PO Box 73012  
Christchurch 8154

**SUBMITTER:** Annex Developments Ltd

**Address for Service:** Annex Developments Ltd  
C/- Planz Consultants Limited  
PO Box 1845  
Christchurch 8140

Attn: Kerry Andrews  
E: [kerry@planzconsultants.co.nz](mailto:kerry@planzconsultants.co.nz)



## Hearing

Annex Developments Ltd wishes to be heard in support of this submission.

## Overview

This is a submission on Plan Change 14 – Housing and Business Choice (“PC14”) from Christchurch City Council (“the Council” on the Operative Christchurch District Plan (“the Plan”).

Proposed Plan Change 14 was notified on the 17<sup>th</sup> of March 2023. The Plan Change covers multiple topics and chapters of the District Plan, seeking to give effect to the NPS-UD which directs provisions multi-housing standards.

### **The specific provisions of the proposal that this submission relates to:**

- Christchurch District Plan Maps 40 and 47
- Brownfield Overlay

## Background

Annex Developments Ltd own a complex on the southwest corner of Garlands Road and Cumnor Terrace in Woolston known as ‘The Tannery’. Following the Canterbury Earthquakes, the site underwent extensive re-development into a mixed-use commercial complex which provides for a range of retail, hospitality, and light industrial activities.

As per operative District Plan provisions, the site is zoned Industrial General. The proposed district plan provisions seek to rezone the site to Mixed Use Industrial. The Mixed-Use Commercial Zone is intended to replace the Industrial General Zone and will enable residential and commercial activities to continue to be established.

Provisions for the Mixed-Use Zone enable a range of industrial and commercial activities but prepares the zone in anticipation of a shift to primarily residential activity.

The northern end of the site is also subject to the Brownfield Precinct as per the operative district plan which enables a mix of residential and commercial activities in the area.



Figure 1. Proposed District Plan Map of The Tannery Site. Retrieved from Christchurch City Council District Plan Maps



Figure 2. Aerial overview of the site. Retrieved from Google Maps 2023

## Relief Sought

Annex Developments consider proposed rezoning from Industrial General to Mixed Use Commercial for the Tannery site at Garland Road, Woolston, to be appropriate for the use of the site.

In a submission for Plan Change 5, it was noted that the Industrial General Zoning, and the Brownfields Overlay applicable to the Tannery site did not fit the activities and the outcomes sought for site. It was considered the size of the Tannery site was more in keeping with the Commercial Local Zone.

It is noted that the Brownfield Overlay, which the Tannery has been identified to be within, does not apply as there are no provisions for the Brownfield Overlay in proposed Chapter 15 – Commercial.

Proposed Provisions	Position	Relief Sought	
Proposed planning maps 40 & 47	Support in full	No amendments requested	N/A
Chapter 15 – Commercial Policy 15.2.3.2	Support in part	Add a new clause e. to the policy 15.2.3.2 as follows: <b><u>e. To encourage the redevelopment of areas located within a Brownfield Overlay on the planning maps to allow a mix of commercial and residential activities.</u></b>	It is noted the requested relief aligns the maps with the proposed objectives, policies and rules in regard to the Brownfield Overlay and Mixed-Use Commercial Zone provisions.

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 trade competition or the effects of trade competition.

Signed on behalf of Annex Developments Ltd

*K. on 8*

Planz Consultants Ltd

8<sup>th</sup> May 2023

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

## Submitter Details

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

**First name:** Lisa **Last name:** Steele

**Preferred method of contact** Email

**Postal address:** PO Box 1845

**Suburb:**

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8140

**Email:** lisa@planzconsultants.co.nz

**Daytime Phone:** 0221537909

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 49.1

- Support
- Oppose
- Seek Amendment

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

J & P Snowdon seek to re-zone the residential zoned portion of the site, comprising the southern portion of 544 Tuam Street and the adjoining land at 102-104 Mathesons Road, to **Neighbourhood Centre**.

**My submission is that**

Refer to attached submission. In summary, J & P Snowdon seek to re-zone the residential zoned portion of the site, comprising the southern portion of 544 Tuam Street and the adjoining land at 102-104 Mathesons Road, to **Neighbourhood Centre**.

## Attached Documents

File
City Salvage Submission on PC14 Final

**VIA INTENSIFICATION PLANNING INSTRUMENT (IPI) IN ACCORDANCE WITH  
SECTION 80F(1)(a), RESOURCE MANAGEMENT ACT 1991  
SUBMISSIONS ON PROPOSED PLAN CHANGE 14**

**TO:** Christchurch City Council (**Council**)  
**Via email:** engagement@ccc.govt.nz

**SUBMITTER:** **Paddy and Jackie Snowdon**  
**The Pumphouse**  
544 Tuam Street  
CHRISTCHURCH 8011

**Contact:** 0274324878  
**Email:** info@citysalvage.co.nz

**ADDRESS FOR SERVICE:** **Planz Consultants Limited**  
PO Box 1845  
CHRISTCHURCH 8140

**Contact:** Lisa Steele  
Consultant Planner

**Mobile:** 0221537909  
**Email:** lisa@planzconsultants.co.nz

## INTRODUCTION

Jacky and Paddy Snowdon (J & P Snowdon) have owned the property at 544 Tuam Street since 1989 and have operated a demolition yard from the property for a number of years. This property was formerly owned by the Christchurch Drainage board and contains a historic pumphouse, the original no 1 pump station for sewerage in Christchurch. They also own three adjoining properties at 100, 102 and 104 Mathesons Road. These properties formerly contained residential dwellings which were demolished after the dwellings at 100 and 104 Mathesons Road were damaged during the Canterbury earthquakes.

J & P Snowdon currently operate a demolition yard from the Pumphouse site. Following the demolition of the dwellings at 100-104 Mathesons Road, these properties have been used for vehicle parking in relation to the demolition yard. The use of the residentially zoned land for this activity was not consented and has recently been discontinued in response to enforcement action undertaken by the Council.



**Figure 1:** Aerial photo of the site currently occupied by the City Salvage demolition yard. The historic pumphouse is located centrally within the site.

The site has a split zoning, with the northern portion of 544 Tuam Street being zoned Commercial Local, and the three Mathesons Road properties and the area of 544 Tuam Street east of these properties being zoned Residential Medium Density. The Pumphouse building is listed in the Plan as a heritage building, and a heritage setting applies across 544 Tuam Street.

The heritage building was red stickered after the Canterbury earthquakes, having been assessed at 10 percents of the New Building Standard, however the submitters, undertook the necessary restoration and strengthening works to allow the building to be retained and used. Their work was recognised at the 2021 Christchurch Heritage Awards.

The operative zoning and heritage overlays are shown in **Figure 2** below.





**Figure 2** Operative zoning at 544 Tuam Street and 102-104 Mathesons Road. The site is zoned Commercial Local (pink) and Residential medium density (yellow). The extent of the heritage setting is indicated by the purple dotted line.

Under PC13 and PC14 the site will be zoned Neighbourhood Centre Zone (NCZ) and Medium Density Residential Zone (MDRZ). The pumphouse building remains a listed heritage building and the proposed heritage setting boundaries are unchanged. The proposed zoning is shown in **Figure 3** below.



**Figure 3** – Proposed zoning and heritage overlays applicable to the site.

## NATURE OF SUBMISSION

J & P Snowdon seek to re-zone the residential zoned portion of the site, comprising the southern portion of 544 Tuam Street and the adjoining land at 102-104 Mathesons Road, to **Neighbourhood Centre**. The extent of land proposed to be rezoned, referred to hereafter as the 'submission site' is identified in figure 4 below and in the plan attached in **Annexure 1**.



**Figure 4** – Land proposed to be rezoned

The submission site is well located for commercial use, being directly adjacent to the Pumphouse site which is already commercially zoned and currently used for a demolition yard and stock and sell recycled building materials. The submitters intention is to continue this activity in the short term and to further develop the Pumphouse site for community and commercial activities in the longer term.

The proposed rezoning of the submission site will represent an efficient use of an existing land resource that has recently been used for commercial activities, albeit without consent. The proposed Neighbourhood Centre zone will provide for greater flexibility in the use of the land in association with activities in the historic Pumphouse building. In addition, the rezoning will continue to support the retention and use of the heritage listed Pump House complex.

As noted above, 544 Tuam Street currently has a split zoning. Extending the Neighbourhood Centre zone across the remainder of 544 Tuam Street and 100-104 Mathesons road would provide a single zoning across 544 Tuam Street and 'square off' the boundary with the adjoining residential zone.

The proposed Neighbourhood Centre zoning is intended to provide for small groups of primarily convenience shops and in some instances community facilities, comprising up to 3000m<sup>2</sup> of retail space. The built form standards, which include minimum setback requirements, recession planes and landscaping in relation to residential zone boundaries, provide appropriate protection for the adjoining residential properties.

The area of the land proposed to be rezoned is approximately 2029m<sup>2</sup> and will result in a total area approximately 8093m<sup>2</sup> of land being zoned Neighbourhood Centre. Given the location of the historic

pump house building centrally within the site at 544 Tuam Street, and the requirements for resource consent for new buildings within the heritage setting, rezoning the additional land is not anticipated to result in more than 3000m<sup>2</sup> of commercial floorspace being established in this location.

**Relief Sought:**

a) That the land identified in **Annexure 1** attached be re-zoned to Commercial Local.

Or any other alternative relief that meets the intent of the above.

**CONCLUSION**

J & P Snowdon support the proposed plan change subject to the relief sought above, or any alternative and consequential relief achieving the same outcomes the Council considers more appropriate.

In relation to the proposed new provisions, the submitter considers that without inclusion the Proposed Plan as notified:

- (a) Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991;
- (b) will support the long term retention and use of an important heritage item;
- (c) will not provide for the most efficient use and development of the existing land resource at 544 Tuam Street and 100-104 Mathesons Road and
- (d) do not represent the most appropriate means of exercising Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.

In making this submission J & P Snowdon confirm they could not gain an advantage in trade competition through the outcomes sought in this submission.

J & P Snowdon wish **to be heard** in support of this submission. If others are making a similar submission, they would consider presenting a joint case with them at the hearing.

**Date:** 8 May 2023

Lisa Steele

**Consultant Planner**

Authorised to sign this submission on behalf of **J & P Snowdon**

**ANNEXURE 1:**  
**Land proposed for rezoning**



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

## Submitter Details

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

**First name:** Ian **Last name:** Dyson

**Preferred method of contact** Email

### Postal address:

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** dyson.home@gmail.com

**Daytime Phone:** 021608540

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

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

Note to person making submission:

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

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 50.1

- Support
- Oppose
- Seek Amendment

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

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

**My submission is that**

It appears that the proposed changes to building height and density allowance has been done without the usual considered planning restrictions. Christchurch does not have a major issue with shortage of available land. I

agree with the goals of densification, but it needs to be done in a controlled manner by releasing designated areas for development. Other areas can then be released as requirements dictate.

The proposed plan will result in isolated developments that will be out of place and cause discontent with neighbors. The approach to focus development around bus routes is short sighted and is likely not to apply in future when small on-demand autonomous vehicles are likely to replace buses.

Of particular concern to residents of the Cashmere hill suburb is the height allowance. The main reason for living on the hill is to have a view. Inconsiderate developers will be able to construct tall buildings that will block the view and potentially reduce the value of neighboring homes by hundreds of thousands of dollars. The allowance for tall buildings in these areas is totally unnecessary and in general will not be used, but isolated cases will cause major grief.

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#### Attached Documents

File
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No records to display.