

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

## Submitter Details

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

**First name:** Jess **Last name:** Green

**Preferred method of contact** Email

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**Suburb:** Shirley

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8061

**Email:** something\_jessish@hotmail.com

### Daytime Phone:

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

I am not  
directly affected by an effect of the subject matter of the submission that :  
a. adversely affects the environment, and  
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:** 51.1

- 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 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.

**My submission is that**

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.

**Original Submitter:**

**Original Point:**

**Points:** 51.2

- 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***

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

**My submission is that**

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.

**Original Submitter:**

**Original Point:**

**Points:** 51.3

- 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***

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

**My submission is that**

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.

**Original Submitter:**

**Original Point:**

**Points:** 51.4

- 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***

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.

**My submission is that**

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.

---

Attached Documents

| File                   |
|------------------------|
| No records to display. |

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

## Submitter Details

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

**First name:** Declan **Last name:** Cruickshank

**Preferred method of contact** Email

**Postal address:** 24 Newbridge Place

**Suburb:** Ilam

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8041

**Email:** declanc@hotmail.co.nz

### Daytime Phone:

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**Original Point:**

**Points:** 52.1

- Support
- Oppose
- Seek Amendment

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

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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.

**My submission is that**

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.

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**Original Point:**

**Points:** 52.2

- Support
- Oppose
- Seek Amendment

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

**My submission is that**

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**Original Point:**

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- Seek Amendment

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

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**Original Point:**

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- Seek Amendment

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

## Submitter Details

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

**First name:** DAVID **Last name:** MCLAUHLAN

**Preferred method of contact** Email

**Postal address:** 21 Palmside Street

**Suburb:** Somerfield

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8024

**Email:** mclauchlan1952@gmail.com

**Daytime Phone:** 0212432976

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**Original Point:**

**Points:** 53.1

- 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 attached

Attached Documents

|                        |
|------------------------|
| File                   |
| Residential submission |
| GREENSPACE             |
| Palmside Street        |



## Residential

1. The road setback of 1.5m from the street boundary may be reasonable in streets that have a wide 20m legal width however for narrower streets the consequence will be claustrophobic with a loss of a spacious and a pleasant street vista.

**Relief: Have a building setback of 11.5m from the road centre line.**

2. Narrow streets that contain pedestrian cycleways should be exempt from the proposed intensive development as the streets are required to be relatively traffic free to maintain a safe and friendly environment for cyclists. If intensive developments are allowed, then more cars will ultimately will be parked on the road because of the lack of onsite parking making narrow street even more difficult to navigate as is the case for Palmside Street.

**Relief: Have narrow streets with cycleways a Qualifying Matter for exemption from development.**

3. The rear boundary recession plane angle needs to be addressed to preserve the morning sun of the adjacent property. Currently this angle is around 39° to 45° and the proposed 55° will cast unwanted shadows on the neighbouring site.

**Relief: Review the recession plane angle to preserve the morning sun.**

4. The proposed zoning should be done in stages and as such may areas should be zoned RMSZ deferred. This would allow the development to occur from the designated central areas outwards and prevent unsightly and sporadic developments in areas where the infrastructure is yet fully in place for such intensification.

**Relief: Have the outer areas zoned RMDZ deferred.**

5. For developments to occur there should be a minimum net site area requirement of say 2000m<sup>2</sup>. Such a standard would prevent what can be seen happening at the moment where may narrow properties are being intensively developed without meaningful recreation areas. This is going to become an issue as daily temperatures rise and developments have inadequate onsite greenspace areas for families to seek relief. This is currently happening in Europe where Environmental Planners are becoming concerned as many of the existing residential apartment blocks and the adjacent paved open areas are extremely reflective creating unhealthy living environments for the residence. See attached article.

**Relief: Set a minimum net site area standard for developments that allows for permanent and larger green space areas.**

6. Palmside Street currently floods in heavy weather events because the road drains directly to the adjacent Heathcote River. While this is manageable in the current setting with the intensification as proposed by the new zoning there will be less green areas to act as a

sponge and the additional hard surface areas will only accelerate the discharge of surface stormwater to the street which will ultimately exacerbate the flooding issue.

**Relief: Make thus a Qualifying Matter for exemption from development.**

## 16 In depth

# How green space shrank as cities grew

Fields, forests, berms and backyards - they all make city living cooler, healthier and less flood-prone. But they've been disappearing fast. Is it too late to bring them back? **Eloise Gibson and Kate Newton report.**

**T**hink of a green space near your home. It might be a schoolyard, sports field, patch of bush or your own backyard.

It won't surprise you to learn that green spaces like these cool the air compared with buildings and concrete - or that they're much more absorbent during heavy rain. They can even attract a price premium for the surrounding homes.

But the quarter-acre dream is increasingly out of step with New Zealand cities, as terraced homes, apartments, infill housing and huge standalone houses on small sections become common.

As the climate heats, green spaces may become the difference between city life being pleasant and increasingly hot and unbearable.

But a report tabled in Parliament yesterday by the Parliamentary Commissioner for the Environment, Simon Upton, shows it is disappearing.

## Building out and up

The report analysed aerial photos to compare green space in Auckland, Hamilton and greater Wellington between the 1940s, 1980s and today.

Christchurch was too hard to gauge, because of the changes wrought by the city's earthquakes.

In Auckland and Hamilton, in the 1940s, some kind of green space occupied around 70% of urban areas. By 2016, that figure had dropped to more like 55%, and the true figure is probably much lower because it was hard to identify driveways, car parks and other sealed areas in the analysis, the report says.

Most of the losses  
The green spaces near your home are disappearing fast.  
ADOBE

were of private land, whereas the share of city real estate occupied by public reserves stayed roughly the same.

Growth patterns changed over the decades.

Auckland and Hamilton grew mainly outwards until the 1980s, then shifted to building up and filling in gaps, chewing up backyards and other urban greenery along the way.

As populations grew, town planners tried to rein in urban sprawl and inner-city land got more expensive (increasing the incentive to build as much as possible on every slice). People also started building much bigger houses on smaller plots - as well as apartments and terraced homes.

**G**reater Wellington fared much better than the other two cities - for one thing, it's harder to clear its steep hillsides for outward growth than it is to build on flat Auckland and Hamilton countryside.

The capital maintained its share of green space, so Wellington today has about the same proportion of greenery as it did 80 years ago - more than Auckland or Hamilton per capita.

But its population also grew. All three cities now have more people for every square

metre of urban green space than they did in the 1940s or the 1980s.

The ratio is worsening, as multi-home developments are approved with smaller green areas than existing homes. Even those new, smaller outdoor spaces are at risk of being paved or artificially turfed over,

says Upton. These little bits of green are supposed to be there forever, "but, of course, they tend to get patio'd over, or concreted over, and there's no-one checking on that. So something that is meant to be 20% (of a site) could end up actually being 5% or 0 in 20 years' time."

Unlike tree cover, which is related to wealth, green space isn't obviously connected to affluence.

But it is unequally spread around. In Auckland and Hamilton, people living in the greenest 25% of suburbs enjoy about three times as much public green space as people in the least green 25% of suburbs, according to the commissioner's report. In greater Wellington there is even more

disparity because of the large network of parks and reserves concentrated around the hilly edges of the urban area.

Green space itself can confer a premium: one study cited in the report found a price boost in the order of 15% for Auckland apartments sited near parks, though there was no clear pattern for other dwellings.

## Essential services

Anything from a vegetable garden to a grass berm along the road, to a school sports field or a golf course, counts as green space, though each variety has different benefits.

Both private and public green space work equally well at cooling nearby properties, managing stormwater and filtering pollutants from the air - but only public land is useful for the public to exercise and socialise on.

So, a steep, undeveloped, tree-lined Wellington ravine might be useless for walking or playing sport, but will still benefit nearby residents by cooling and purifying the air. Grass is obviously best as a surface for sport and better than concrete for handling rain - but dry, compacted lawn is not much help for absorbing



Updated all day at **Stuff**TREES THAT  
COUNT

## There are the options of protecting more existing trees whenever land is developed, or even an “uplift tax” requiring parks to be paid for when rural land is up-zoned.

water.

All plants filter the air by either trapping or absorbing pollutants (such as deadly particulates from traffic), but trees are particularly good at it because of their larger leaves.

Trees are also better than grass at cooling the air and dealing with rain, while wetlands are the best at dealing with heavy rain and stormwater, the report says. “Green spaces

act like giant sponges, slowing the flow of rainwater and trapping and filtering pollutants. When rain falls on a patch of bush or forest, or even a lawn, some of the water is caught by the vegetation.”

Perhaps a third of the rainwater evaporates from plant leaves without reaching the ground, while some is stored in leaf litter and soil, or taken up by plant roots.

A planning tool for Auckland Council estimates cited by Upton building over 60% of a site (rather than 20%) can increase the rain runoff by 20 times.

(Though planners have noted that even trees and grass can do little against the volume of rain experienced in recent cyclones.)

The effect on heat is almost even more startling. Research published last year showed the

hottest days of the year have already warmed by more than 0.5C over the past 20 years in many populated regions of New Zealand. Urban areas with lots of heat-trapping concrete and buildings can be 4-5C hotter than the countryside – and even in New Zealand, extreme heat can be deadly.

But green space can ameliorate the hot box effect. A recent study cited in Upton’s report found a 20% increase in green space was associated with a 9% reduction in mortality from heat. And the benefits flow beyond the green boundaries.

Another global study of more than 30 urban parks found that those over 10 hectares could provide a temperature reduction of up to 1.2C, up to 350 metres from the park boundary.

Then there are those rare pockets of old-growth biodiversity, somehow still surviving in the midst of cars, buildings and people.

“I’m raising this [issue] in respect of humans,” says Upton, because “it will be hotter, stickier, nastier, what have you, but just for the sake of the environment – that stuff that needs to be protected as well.”

### Density with a difference

Upton says the report isn’t anti-densification – far from it. Denser cities require people to travel less, and allow faster, more efficient public transport, lowering planet-heating emissions.

Keeping development inside existing city limits also halts the munching of productive food-growing soil – an issue particularly in Auckland.

But as city populations grow (and Auckland’s has been growing by almost 30,000 people a year), the housing boom needs to build in much more green space, the report says.

Apartments can retain more green than townhouses or terraced houses because, by building up, they leave more space for other amenities, says Upton. However, that holds true only if the councils consenting development make providing green spaces worthwhile, or compulsory.

With both the National Policy Statement on Urban Development and the Medium Density Residential Standards directing cities to allow more housing growth in many neighbourhoods, there’s a risk that more

green areas will be built over forever, Upton says.

While those documents have provisions about landscaped areas and public open space, the report says they could do more, because they don’t treat green space as being as essential as wastewater, drinking pipes and transport.

**A**s for the solutions? There’s room to upgrade existing road margins by moving from grass to more cooling and absorbent shrubbery and trees, Upton says, though it depends on the soil depth and other constraints like underground pipes.

Existing grassy parks could get more clumps of trees.

“There’s the question of making really good, green use of every available corner of the public estate,” he says. “All around New Zealand councils have got little bits of land that are not being used.”

Roads could eventually be reconfigured. “A shadeless inner-city street today with two footpaths, two grassy berms, two rows of car parks, two lanes for traffic and a maze of underground pipes and cables could potentially be reconfigured to contain one footpath, one cycle-way, one lane for slow traffic (with passing bays), parking for cars, rain gardens, space for large trees and perhaps even community gardens,” the report says.

Then there are the options of protecting more existing trees whenever land is developed, or even an “uplift tax” requiring parks to be paid for when rural land is up-zoned.

Upton’s report doesn’t cost the options. “It will be more costly. And before anyone says, ‘oh, we can’t afford all that’, living in a hotter world, the more extremes of it will be more costly. Whatever we do – do nothing, it’ll be more costly. Do something, it’ll be more costly. It’s a question to how those costs fall.

“If you say, ‘Oh, it’s too expensive,’ well, you will pay a price down the track. There is no cheap solution here. With climate change generally, there is no cheap solution.”

With cities getting hotter, more populous and more prone to heavy rain, he says it’s time to start treating green space as an essential service.



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

## Submitter Details

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

**First name:** Wendy **Last name:** Fergusson

**Preferred method of contact** Email

**Postal address:** 45A Gracefield Avenue

**Suburb:** Christchurch Central

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8013

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

**Daytime Phone:** 021885358

I could not  
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Additional requirements for hearing:

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 54.1

- 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*

Population should be kept to the 10-30 year term.

Walkable catchment should be 10mins max. Remove those residential areas that are on the inside fringes of Bealey Ave. A 6 storey building in some of these neighbourhoods would destroy them.

**My submission is that**

I am wondering why the council is doing more than it needs to. Especially as it will be revamped in the next district plan review.

Your Walkable catchments seem huge, have you walked these? From my home near Bealey Ave it's a 20 min walk to an ATM or supermarket.

---

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

**Points:** 54.2

- 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*

Population should be kept to the 10-30 year term.

Walkable catchment should be 10mins max. Remove those residential areas that are on the inside fringes of Bealey Ave. A 6 storey building in some of these neighbourhoods would destroy them.

Please ensure there is off street parking for every residential building/block.

Restrict the city sprawl.

Strengthen the requirements for trees.

Reduce all the building height allowances a bit and have a steeper pyramid shape of reducing heights out to the edges of the walkable catchment.

**My submission is that**

I am wondering why the council is doing more than it needs to. Especially as it will be revamped in the next district plan review.

Your Walkable catchments seem huge, have you walked these? From my home near Bealey Ave it's a 20 min walk to an ATM or supermarket in the centre of the city.

All residential blocks need an off-street carpark. We have trouble with residential blocks nearby that don't have off-street parking. The residents charge their EVs on the street, the Airbnb cleaner double parks in the street etc.

Development in rural areas should be restricted if you are going to intensify the city.

Trees

Building heights

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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:** 11/05/2023

**First name:** Daymian **Last name:** Johnson

**Preferred method of contact** Email

**Postal address:** Flat 2, 360 Worcester Street

**Suburb:** Linwood

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8011

**Email:** dj.daymo@gmail.com

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**Original Point:**

**Points:** 55.2

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

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**Original Point:**

**Points:** 55.3

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

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**Original Submitter:**

**Original Point:**

**Points:** 55.4

- Support
- Oppose
- Seek Amendment

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

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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.

**My submission is that**

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.

---

**Attached Documents**

| File                   |
|------------------------|
| No records to display. |

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

## Submitter Details

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

**First name:** Francesca **Last name:** Teague-Wytenburg

**Preferred method of contact** Email

**Postal address:** 6 Trina Place

**Suburb:** Shirley

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8061

**Email:** poursomesugaronu2@gmail.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  
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:** 56.1

- 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 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.

**My submission is that**

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.

**Original Submitter:**

**Original Point:**

**Points:** 56.2

- 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***

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

**My submission is that**

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.

**Original Submitter:**

**Original Point:**

**Points:** 56.3

- 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***

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

**My submission is that**

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.

**Original Submitter:**

**Original Point:**

**Points:** 56.4

- 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***

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.

**My submission is that**

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.

---

**Attached Documents**

| File                   |
|------------------------|
| No records to display. |

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

### Submitter Details

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

**First name:** Clair **Last name:** Higginson

**Preferred method of contact** Email

**Postal address:** Unit G01, The Forge, 36C

Welles Street

**Suburb:** Christchurch Central

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8011

**Email:** clairhigginson@gmail.com

**Daytime Phone:** 0211022182

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:** 57.1

- Support
- Oppose

☉ Seek Amendment

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

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

### Chapter 3

Add: 3.3.1 (iv) Considers sustainability and potential effects of Climate Change andnbsp;( these need to be overarching and considered in any and all decisions)

Change

#### 3.3.5

a. The critical importance of business and economic prosperity to Christchurch's recovery

To: The critical importance of business and economicandnbsp;wellbeingandnbsp;to Christchurch's recovery

### Chapter 15

**Add new (viii) below**

a. Whether the increased height,or reduced setbacks, or recession plane intrusion would result in that do not compromise the amenity of adjacent properties planned urban built

taking into account The following matters of discretion apply:

- i. Building bulk and dominance effects on surrounding neighbours;
- ii. Privacy and shading effects on surrounding neighbours, including on habitable rooms or outdoor living spaces;

#### 15.1314.2.6 Commercial Centralandnbsp;Cityandnbsp;Business City Centre and Central Cityandnbsp;

##### Mixed Use Zones urban designandnbsp;

The extent to which theandnbsp;buildingandnbsp;or use:andnbsp;

- i. recognises and reinforces the context of aandnbsp;site, having regard to the identified urban form for theandnbsp;Commercial Centralandnbsp;Cityandnbsp;Business City Centreandnbsp;Zone, the grid and diagonal street pattern, natural, heritage or cultural assets, andandnbsp;public open spaces;andnbsp;
- ii. in having regard to the relationship of Ngāi Tūāhuriri/ Ngāi Tahu with Ōtautahi as a cultural element, consideration should be given toandnbsp;landscaping, the use of Te Reo Maori, design features, the use of locally sourced materials, and low impact design principles as is appropriate to the context.;andnbsp;
- iii. in respect of that part of theandnbsp;buildingandnbsp;or use visible from a publicly owned andandnbsp;accessibleandnbsp;space, promotes active engagement with the street, community safety,andnbsp;human scaleandnbsp;and visual interest;andnbsp;
- iv. takes account of nearby in respect of the exterior design, materials, architectural form, scale and detailing of the ;andnbsp;
- v. is designed to emphasise the street corner (if on aandnbsp;corner site);andnbsp;
- vi. is designed to incorporateandnbsp;Crime Prevention Through Environmental Designandnbsp;(CPTED) principles, including encouraging surveillance, effective lighting, management of public areas andandnbsp;boundaryandnbsp;demarcation; andandnbsp;
- vii. incorporatesandnbsp;landscapingandnbsp;or other means to provide for increased amenity, shade and weather protection.andnbsp;

##### My submission is that

By and large I agree with the proposal. andnbsp;Needs more intentional planning around sustainability and effects of Climate Change. andnbsp;I think decisions on plan change 12 should precede/preempt those of plan change 14

Needs a more serious look at tree canopy and open space to be considerate for inner city living andnbsp;Asking



for more focus on landscaped laneways and small park areas.

## Chapter 15

A precaution for CCMUZ - Significant change in height is proposed in this area with existing (new) multi unit residences andnbsp;An inclusion of a clause from 14.15.3

**Original Submitter:**

**Original Point:**

**Points:** 57.2

- 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***

Add 3.3.1 (iv) Considers sustainability and potential effects of Climate Change andnbsp;( these need to be overarching and considered in any and all decisions)

Change

3.3.5

a. The critical importance of business and economic prosperity to Christchurch's recovery

To: The critical importance of business and economicandnbsp;**wellbeingandnbsp;**to Christchurch's recovery

## Chapter 15

**Add new (viii) below**

a. Whether the increasedandnbsp;**height,orandnbsp;**reducedandnbsp;**setbacks, or recession plane intrusionandnbsp;**would result in that do not compromise theandnbsp;**amenity of adjacentandnbsp;properties planned urban builtandnbsp;**

taking into account The following matters of discretion apply:andnbsp;

- i. Building bulk and dominance effects on surrounding neighbours;andnbsp;
- ii. Privacy and shading effects on surrounding neighbours, including onandnbsp;**habitable roomsandnbsp;**orandnbsp;**outdoor living spaces;**andnbsp;

**15.1314.2.6 Commercial Centralandnbsp;Cityandnbsp;Business City Centre and Central Cityandnbsp;**

**Mixed Use Zones urban designandnbsp;**

The extent to which theandnbsp;**buildingandnbsp;**or use:andnbsp;

- i. recognises and reinforces the context of aandnbsp;**site**, having regard to the identified urban form for theandnbsp;**Commercial Centralandnbsp;Cityandnbsp;Business City Centreandnbsp;**Zone, the grid and diagonal street pattern, natural, heritage or cultural assets, andandnbsp;**public open spaces;**andnbsp;
- ii. in having regard to the relationship of Ngāi Tūāhuriri/ Ngāi Tahu with Ōtautahi as a cultural element, consideration should be given toandnbsp;**landscaping**, the use of Te Reo Maori, design features, the use of locally sourced materials, and low impact design principles as is appropriate to the context.;andnbsp;

- iii. in respect of that part of the **building** or use visible from a publicly owned **accessible** space, promotes active engagement with the street, community safety, **human scale** and visual interest;
- iv. takes account of nearby in respect of the exterior design, materials, architectural form, scale and detailing of the ;
- v. is designed to emphasise the street corner (if on a **corner site**);
- vi. is designed to incorporate **Crime Prevention Through Environmental Design** (CPTED) principles, including encouraging surveillance, effective lighting, management of public areas and **boundary** demarcation; and
- vii. incorporates **landscaping** or other means to provide for increased amenity, shade and weather protection.

**My submission is that**

By and large I agree with the proposal. Needs more intentional planning around sustainability and effects of Climate Change. I think decisions on plan change 12 should precede/preempt those of plan change 14

Needs a more serious look at tree canopy and open space to be considerate for inner city living Asking for more focus on landscaped laneways and small park areas.

A precaution for CCMUZ - Significant change in height is proposed in this area with existing (new) multi unit residences An inclusion of a clause from 14.15.3

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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:** 11/05/2023

**First name:** Ben **Last name:** Thorpe

**Preferred method of contact** Email

**Postal address:** 17 Days Road

**Suburb:**

**City:** Lyttelton

**Country:** New Zealand

**Postcode:** 8082

**Email:** benjaminsthorpe@gmail.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  
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:** 58.1

- 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 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.

**My submission is that**

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.

**Original Submitter:**

**Original Point:**

**Points:** 58.2

- 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***

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

**My submission is that**

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.

**Original Submitter:**

**Original Point:**

**Points:** 58.3

- 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***

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

**My submission is that**

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.

**Original Submitter:**

**Original Point:**

**Points:** 58.4

- 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***

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.

**My submission is that**

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.

---

**Attached Documents**

| File                   |
|------------------------|
| No records to display. |

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

## Submitter Details

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

**First name:** Lucy **Last name:** Wingrove

**Preferred method of contact** Email

**Postal address:** 146 Lincoln Road

**Suburb:** Addington

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8024

**Email:** lucy.wingrove@iag.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:** 59.1

- 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 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.

**My submission is that**

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.

---

#### Attached Documents

| File                   |
|------------------------|
| No records to display. |

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

## Submitter Details

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

**First name:** Bray **Last name:** Cooke

**Preferred method of contact** Email

**Postal address:** 18 Glenburn Place

**Suburb:** Avonhead

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8042

**Email:** bco83@uclive.ac.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:** 60.1

- 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 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.

**My submission is that**



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.

---

**Original Submitter:****Original Point:****Points:** 60.2

- 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***

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

**My submission is that**

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.

---

**Attached Documents**

| File                   |
|------------------------|
| No records to display. |

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

## Submitter Details

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

**First name:** Edward **Last name:** Parkes

**Preferred method of contact** Email

**Postal address:** 7 Wadeley Road

**Suburb:** Ilam

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8041

**Email:** parksie2148@gmail.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  
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:** 61.1

- 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 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.

**My submission is that**

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.

**Original Submitter:**

**Original Point:**

**Points:** 61.2

- 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***

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

**My submission is that**

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.

**Original Submitter:**

**Original Point:**

**Points:** 61.3

- 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***

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

**My submission is that**

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.

**Original Submitter:**

**Original Point:**

**Points:** 61.4

- 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***

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.

**My submission is that**

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.

---

**Attached Documents**

| File                   |
|------------------------|
| No records to display. |

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

## Submitter Details

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

**First name:** Bryce **Last name:** Harwood

**Preferred method of contact** Email

**Postal address:** Unit 1, 160 Hills Road

**Suburb:** Edgware

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8013

**Email:** bryceharwood1@gmail.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  
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:** 62.1

- 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 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.

**My submission is that**

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.

**Original Submitter:**

**Original Point:**

**Points:** 62.2

- 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***

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

**My submission is that**

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.

**Original Submitter:**

**Original Point:**

**Points:** 62.3

- 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***

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

**My submission is that**

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.

**Original Submitter:**

**Original Point:**

**Points:** 62.4

- 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***

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.

**My submission is that**

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.

---

**Attached Documents**

| File                   |
|------------------------|
| No records to display. |

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

## Submitter Details

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

**First name:** Andrew **Last name:** Fitzgerald

**Preferred method of contact** Email

**Postal address:** PO Box 365

**Suburb:**

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8140

**Email:** andrew@novogroup.co.nz

**Daytime Phone:** 021367561

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:** 63.1

- Support
- Oppose
- Seek Amendment



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

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

See attached letter

**My submission is that**

See attached letter

---

**Original Submitter:**

**Original Point:**

**Points:** 63.2

- 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*

See attached letter

**My submission is that**

See attached letter

---

Attached Documents

| File                            |
|---------------------------------|
| 079174 PC14 submission 11052023 |



11 May 2023

Christchurch City Council

**Lodged Via:** Have Your Say Webpage

**Novo Group Limited**  
 Level 1, 279 Montreal Street  
 PO Box 365, Christchurch 8140  
 0 - 03 365 5570  
 info@novogroup.co.nz

To Christchurch City Council,

**FORM 5 - WILLIAMS CORPORATION LIMITED  
 SUBMISISON ON PLAN CHANGE 14 TO THE CHRISTCHURCH DISTRICT PLAN –  
 UNDER CLAUSE 6 OF SCHEDULE 1, RESOURCE MANAGEMNT ACT 1991**

1. The following submission on Plan Change 14 ('**PC14**') is lodged on behalf of Williams Corporation Limited ('**WC**'). This covers two separate issues which will be addressed in turn:
  - a. Management of reverse sensitivity for brownfield development, and
  - b. Qualifying Matters as they apply to 9 Patten Street, Avonside.
2. WC could not gain an advantage in trade competition through this submission.
3. WC wishes to be heard in support of their submission. If others make a similar submission, WC would be willing to consider presenting a joint case with them at a hearing.

**Chapters 14 and 16: Management of reverse sensitivity for brownfield redevelopment**

4. WC seeks amendments to two specific policies under Chapters 14 and 16 of the District Plan.
5. There are two relevant District Plan policies for the management of reverse sensitivity in relation to brownfield redevelopments (with the proposed wording from PC14 listed below with emphasis added):

*Residential Chapter Policy 14.2.10.1 Policy Redevelopment of brownfield sites: a. To support and incentivise the comprehensive redevelopment of brownfield sites for mixed use residential activities and commercial activities where: ...iii. Reverse sensitivity effects on existing industrial areas are managed:*

*Industrial Chapter 16.2.2.2 Policy – Brownfield redevelopment c. Brownfield redevelopment proposals as provided for in sub-clause a. and b. above shall also ensure that: i. any redevelopment will not give rise to reverse sensitivity effects on existing industrial activities, or other effects, that may hinder or constrain the establishment or ongoing operation or development of industrial activities and strategic infrastructure;*



6. Also of relevance is the following Policy 6.3.8 (regeneration of brownfield land) of the Canterbury Regional Policy Statement (CRPS):

*To encourage and provide for the recovery and regeneration of existing brownfield areas through new comprehensive residential, mixed-use or business developments, provided such activities will ensure the safe and efficient functioning of the transport network and will not have significant adverse distributional or urban form effects on the Central City, Key Activity Centres and neighbourhood centres, or give rise to significant reverse sensitivity effects.*

7. There is a clear difference in the scale of these reverse sensitivity effects between the CRPS and the District Plan (inclusive of the changes proposed under PC14). Indeed this was identified and discussed in the decision for Plan Change 5C, where in paragraph 73 it was stated:

*73. We noted at the hearing that Policy 14.2.7.1 requires that redevelopment of brownfield sites in residential zones “manage” reverse sensitivity effects on industrial areas, whereas Policy 16.2.2.2 requires brownfield redevelopment to “not give rise to reverse sensitivity effects. We acknowledge, as did Mr Pizzey in the Council’s reply, there is an inconsistency in the management of reverse sensitivity effects therefore between these the policies in Chapters 16 and 14, and these should be addressed at a future date. We agree that in the meantime, reference to Policy In of the CRPS is available for brownfield redevelopment in residential zones where there is any uncertainty concerning how reverse sensitivity effects on industrial activities should be managed.*

8. PC14 is an appropriate and opportune time to remedy this inconsistency in the management of reverse sensitivity effects between the District Plan and the CRPS (the latter being the higher order document which takes precedence).
9. WC therefore requests that policies 14.2.10.1 and 16.2.2.2 are amended as follows:

*Residential Chapter Policy 14.2.10.1 Policy Redevelopment of brownfield sites: a. To support and incentivise the comprehensive redevelopment of brownfield sites for mixed use residential activities and commercial activities where: ... **iii. Redevelopment does not give rise to significant reverse Reverse sensitivity effects on existing industrial areas are managed;***

*Industrial Chapter 16.2.2.2 Policy – Brownfield redevelopment c. Brownfield redevelopment proposals as provided for in sub-clause a. and b. above shall also ensure that: i. any redevelopment will not give rise to significant reverse sensitivity effects on existing industrial activities, or other effects, that may hinder or constrain the establishment or ongoing operation or development of industrial activities and strategic infrastructure;*

10. This change will further help in supporting Objective 3 of the National Policy Statement on Urban Development 2020 by enabling brownfield development, as detailed Councils section 32 elevation.



### Qualifying Matters as they apply to 9 Patten Street, Avonside

11. The planning maps under PC14 show that a Low Public Transport Accessibility Qualifying Matter applies to this site.
12. The site is however immediately adjacent to Woodham Road, where the Orbiter runs. This comfortably meets the 800m walk from High Frequency (Core) Routes. Including 9 Pattern Street in this QM/overlay is opposed.
13. In discussions with Council staff (Anita Hansbury, Council Senior Policy Planner), it is understood that an error has been made for some of the walking catchments around the Orbiter bus route, and this rea should not have been captured in the qualifying matter.
14. Therefore, WC requests that this error is corrected, and the Low Public Transport Accessibility Qualifying Matter overlay is removed from 9 Patten Street.
15. Signed for and on behalf of WC by their authorised agents Novo Group.

Yours sincerely,

### **Novo Group Limited**

Andrew Fitzgerald

Principal Planner

**M:** 021 367 561 | **O:** 03 365 5593

**E:** [andrew@novogroup.co.nz](mailto:andrew@novogroup.co.nz) | **W:** [www.novogroup.co.nz](http://www.novogroup.co.nz)

Address for service of submitter:

Williams Corporation Limited

c/- Andrew Fitzgerald

Novo Group

Level 1, 279 Montreal Street

PO Box 365

Christchurch 8140

Email address: [andrew@novogroup.co.nz](mailto:andrew@novogroup.co.nz)



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

## Submitter Details

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

**First name:** Catherine & Peter **Last name:** Morrison

**Preferred method of contact** Email

**Postal address:** 9A Desmond Street

**Suburb:** Merivale

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8014

**Email:** morrisonpc1@gmail.com

**Daytime Phone:** 021 635 732

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:

We are happy to present our submission with others who have similar concerns.

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 64.1

- Support
- Oppose
- Seek Amendment

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

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

We would really like the CCC to seriously consider returning this pocket to a SAM8 type of zoning in order to retain its character. The closest outcome looks like the Residential Character overlay, so that is what we seek.

andnbsp;

We also seek any other decisions or outcomes that respond to the concerns we have raised in our submission.

**My submission is that**

We wish to convey our complete disbelief and register our objections to the CCC Proposed Plan Change 14 to the Christchurch District Plan in relation to our area, Desmond Street and the close surrounding streets of Helmores Lane and Rhodes Street up to Rossall Street.

andnbsp;

1. From our understanding the CCC proposal could make our area a High Density Residential zone allowing development up to 32 metres in height. Even though the CCC website says that developments of this height (or even 20 metres) will require a resource consent. Past experience tells us that there are a lot of developments in this city which get consent even though the neighbours objected to requests from developers wanting to go outside the brief leaving the neighbours helpless.

andnbsp;

2. **Sunlight Access** - Looking at the image from your website showing an indicative illustration of a High Density Residential Zone, it is very clear to see that any surrounding pre-existing properties would not get any sunlight as they could be surrounded on all sides by massive buildings and the only sun they will receive is from the road side. Because of our narrow streets even the roads will be devoid of sunlight in the winter. Your illustration also shows wide streets, while ours are certainly not wide. We always need to pull over to let a car pass through, especially on Helmores Lane and Rhodes St.

andnbsp;

Even your illustrations under the heading of Sunlight Access with MDRS applied are depressing. I have noticed some of these properties already being built around Christchurch. How the CCC and Govt expect humans to live in a property with such a minimal amount of sunlight is beyond me. It cannot be good for one's mental health.

andnbsp;

3. This sheer size of buildings will completely change the character and beauty of our streets as they are now. Also, there will likely be a reduction in the tree canopy surrounding, or on, these properties.

andnbsp;

There are plenty of areas and land around St Albans and Merivale which allow for greater height (in fact they have been built or starting to be built) without having to encroach on our streets.

andnbsp;

4. **Tree Canopy** – As an estimate (and I am sure an under estimation), there would be around 300 trees in and around the immediate areas of Helmores Lane, Desmond Street and Rhodes Streets, not to mention the stretch of Little Hagley Park along Harper Avenue. What an asset!

andnbsp;

It is pretty clear that as with each new development a vast majority of these trees will be gone (excluding of course the Little Hagley Park canopy) and they will not be replaced because of the less amount of land that will be left after each development. andnbsp; Whole sections will have all (or close to) their trees removed. andnbsp;

andnbsp;

CCC information also states “we propose Financial Contributions be required where trees are not retained or planted to help fund increasing our tree canopy cover in the city.” andnbsp; Really? andnbsp; A developer would be only too happy to pay a “financial contribution” in order to fit more units into their development at the expense of trees. andnbsp; Meanwhile the existing area loses trees that are not replaced and the penalty money will be used elsewhere.

andnbsp;

Over the last 20 years more and more homes have been built in our area over the years the number of trees has grown significantly as there has been plenty of room left for them. andnbsp; When we purchased our property in 2000, there was only one tree on our site. andnbsp; We now have over 20. andnbsp; Part of the reason is obviously to beautify our property and another just as important reason is to provide privacy from our neighbours.

andnbsp;

5. **Parking** – there is barely enough parking on Helmores Land and Rhodes Street as it is. Where will the owners or tenants of these developments park? The idea that they won’t need cars doesn’t make sense and evidence is that not everyone who lives around here works in the CBD or nearby. More proof of this is the number of cars that now park around Hagley Park. When we moved here there were barely any cars parked all day around the periphery of Hagley Park and now they cover both sides of Harper Ave, all down Deans Ave, Riccarton Ave – both sides as before). These cars used to be parked in the CBD, but due to loss of carparks there and because it was envisaged people wouldn’t need to take their cars to work because the transport system would be amazing.

andnbsp;

6. **Transport system** – there is not a decent transport system in our area which provides a reliable and regular bus service. Yes, we have a few bus stops, but not many buses that we can take any time of the day and to places we really want to go to. If CCC want to allow buildings of High Density then they need a matching public transport system like they have in Australia.

andnbsp;

7. **Infrastructure** – Does this area have the infrastructure to handle MD let alone HD?

andnbsp;

8. **Character of the Area** –

andnbsp;

Some special features of our 3 small streets include:



- A couple of historic homes which have had a lot of money spent restoring them by their owners with strict compliance rules.
- as mentioned above a beautiful tree canopy not only those on our properties and streets, but those on Little Hagley Park and North Hagley park. The CCC has even planted trees on our grass berms.
- The Avon River with its eco system
- Helmores Lane bridge of which has high historical significance as one of the oldest bridges in the city. It is the only example remaining of a propped beam timber bridge in the city. So significant it was made a pedestrian only bridge after the Christchurch earthquakes. This bridge also has cultural and spiritual significance for its association with the Avon River. There is more information on the bridge on CCC website.
- With plenty of trees and shrubs around the river, these provide a plentiful eco system for various species. It has also been suggested that nature and the preservation of ecosystem services with planning, development and management frameworks is fundamental to the notion of sustainable development.
- Until 2015, our area was zoned SAM8, taking into account many of these features. It would be fair to say that this location has improved greatly since then with residents either rebuilding their existing homes, as before, after the quakes along with the quality new builds.

andnbsp;

Allowing for major development in our area would surely have an adverse effect on this eco system with extra pressure in infrastructure, more residents, more vehicles etc.

andnbsp;

9. It appears to me the CCC has applied a blanket rule for all areas within a radius of the CBD, without taking into consideration pockets where maybe it may not be necessary.

andnbsp;

10. It doesn't seem right that there are historically significant properties in this area which must adhere to strict rules and regulation when renovating, only for the possibility of a large property to be built next door without these restrictions. What would be the point of a beautiful historic home surrounded by buildings up to 32m in height?

---

#### Attached Documents

| File                   |
|------------------------|
| No records to display. |

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

## Submitter Details

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

**First name:** Lawrence & Denise **Last name:** May

**Preferred method of contact** Email

**Postal address:** 23 Desmond Street

**Suburb:** Merivale

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8014

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

**Daytime Phone:** 027 457 5861

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:

We are happy to be part of a combined presentation with others seeking a similar outcome.

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 65.1

- 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 see the decisions we seek in our Residential Chapter submission.

**My submission is that**

Please see our submission on the Residential Chapter.

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

**Points:** 65.2

- Support
- Oppose
- Seek Amendment

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

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

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

**My submission is that**

We are extremely concerned by the impact of the proposed rezoning to High Density Residential, on the character and coherence of our neighbourhood at Helmores Lane, specifically the area consisting of Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) (**the Area**). Owners and occupiers of these properties, ourselves included, have come to this Area to enjoy the amenity that the neighbourhood offers and have invested heavily in securing their properties. These property owners highly value the existing environment and the benefits it provides in terms of pleasantness and lifestyle. Previously, that character had been acknowledged by the identification of the area as a special amenity area (SAM8).

It is accepted that the Area has been subject to some residential re-development over the years, especially since the Canterbury earthquakes, nevertheless it has retained a sense of character and coherence that, we consider, is somewhat unique. It has a relationship to the Avon River and to the parklands beyond, which are part of, and provide a link to the rest of, Hagley Park. It has remained an enclave of relatively spacious residential dwellings that has also enabled the retention of many trees (including significant specimen trees) both within the streetscape and within private properties.

There are also heritage items within the Area that have been identified in the proposals for PC14. These items, including some of the surviving older residences, are an important part of the overall character of the Area. Changing the area around these items would remove their context and impact on their heritage setting.

The inclusion of this area as a High-Density Residential zone threatens to destroy this character and the coherence it provides. This is not simply a question of land values. There is much to be valued in living in an area with its own character and a sense of coherence that we seek to preserve.

Some might say that the change in zoning does not impact on this situation as the coherence will be maintained by existing landowners. This is arguable at best and in the case of the Area, overlooks that the changed zoning would itself change the equation for landowners and, more importantly those who might succeed them. The character of the Area is, in part, based on the longevity of ownership, which naturally means that changes in ownership can happen because of succession amongst other reasons. Newer owners, less invested in the character of the Area, would be free to take advantage of high-density status and, what is feared is a domino effect once the character that makes the Area so valuable to many, begins to be lost.

In addition, we note that there may also be further constraints to High (or even Medium) Density development in the area, which is identified as TC3 land and much of which is also in the Council's own Flood Plain overlay. That is not to mention potential parking issues that would likely be created if there was a proliferation of High Density accommodation.

We acknowledge that this may not be the only area in Christchurch that holds these fears. We are firmly of the view that such views should not be unnecessarily discounted, where they can be justified.

Within the framework that the Council has chosen to give effect to the new Medium Density Residential standards and the National Policy Statement on Urban Development, we consider that there is the ability to protect what is special about this area by:

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

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

---

#### Attached Documents

| File |
|------|
|      |

File

PC14 Helmores Lane - proposed RCOverlay rules

## PC14 – RESIDENTIAL CHARACTER OVERLAY RULES (PROPOSED)

### CCC Summary of Proposed Changes

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

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

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

### Proposed Rules (Medium Density Residential Zone)

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

|                          |  |                           |
|--------------------------|--|---------------------------|
| Restricted Discretionary | <p>Within a Character Area Overlay:</p> <p>a. The demolition or removal of a building greater than 30m<sup>2</sup> on the site, relocation of a building onto the site, erection of new buildings and alterations or additions to existing buildings, accessory buildings, fences and walls associated with that development.</p> <p>b. This rule does not apply:</p> <p>i. where 14.5.3.1.2 C1 applies.</p> <p>ii. to fences that meet the applicable built form standard 14.5.3.2.12 for that Character Area;</p> <p>iii. to accessory buildings that are less than 30m<sup>2</sup> and located to the rear of the main residential unit on the site and are less than 5 metres in height; iv. to fences that are located on a side or rear boundary of the site, except where that boundary is adjacent to a public space.</p> <p>c. Activities that do not meet Built Form standard 14.5.3.2.6. d. Any application arising from this rule shall not be limited or publicly notified.</p> |                           |
|                          | Building height controls (dependent on the area, but the current Character Areas have 7m and 5.5 height limits proposed)   | In most places, 11 metres |
|                          | <p>Character Areas have a range of other special limits on built form, dependent on the values of that particular Character Area, including:</p> <ul style="list-style-type: none"> <li>- the width of building frontages</li> <li>- landscaping</li> <li>- setbacks (larger than typical)</li> <li>- building coverage</li> <li>- outdoor living space requirements</li> <li>- minimum glazing facing the street</li> <li>- fencing</li> <li>- garaging and car ports</li> <li>- building separation</li> </ul> <p>Generally the built form requirements are stricter than the underlying zoning would otherwise allow.</p>   |                           |

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

### Proposed Subdivision Rules

|  | <b>Activity within a Character Area Overlay</b>   | <b>Activity if not in a Character Area Overlay</b>  |
|--|---|---|
|  | <p>Minimum net site area for subdivision varies between Character Areas in the Medium Density Zone, but is generally larger than the underlying Zone requirement.</p> <p>In High Density Zone – 400m<sup>2</sup>.</p> | <p>400m<sup>2</sup> proposed for the Medium Density Residential Zone or<br/>300m<sup>2</sup> proposed for the High Density Residential Zone</p> |



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

## Submitter Details

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

**First name:** cooper **Last name:** mallett

**Preferred method of contact** Email

**Postal address:** 24 Mountfort Street

**Suburb:** Spreydon

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8024

**Email:** cooperisnumberone@gmail.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  
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:** 66.1

- 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 all the tall buildings in the middle of the city

**My submission is that**

I think that with all the 3-4 story buildings it is really hard for people to get good houses around a school or shops.

having a house with no backyard isn't good for families and older people

I don't like all the really tall houses around the suburbs I think they should be in the middle of the cities I also don't like how all the farmlands/free areas/suburbs are being made into apartments

---

Attached Documents

| File                   |
|------------------------|
| No records to display. |

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

## Submitter Details

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

**First name:** Liz **Last name:** Oliver

**Preferred method of contact** Email

**Postal address:** 50 Tomes Road

**Suburb:** St Albans

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8052

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

**Daytime Phone:** 0212226353

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:** 67.1

- Support
- Oppose
- Seek Amendment

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

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

**My submission is that**

The MRZ should be concentrated closer to commercial areas. the implementation of 3 storey buildings being able to build as close as 1 metre from the boundary in the current residential areas that have been purchased

due to the space and have chosen to have back yards without buildings encroaching on sunlight or privacy.

it doesn't make sense - completely agree that in built up areas, such as Edgware where it fits to have infill housing and denser concentration or new subdivisions that are built specifically with high density in mind are then built.

this will destroy the residential feel for areas that are not close to town.

the boundaries for MRZ should be closer to the city centre

---

Attached Documents

| File                   |
|------------------------|
| No records to display. |

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

## Submitter Details

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

**First name:** Keri **Last name:** Murison

**Preferred method of contact** Email

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** keri.murison@xtra.co.nz

**Daytime Phone:** +64211623980

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:** 68.1

- 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***

Strowan should not be HRZ.

**My submission is that**

I live in Halton Street, Strowan and I am concerned that the proposed Housing and Business Choice Plan Change 14 (PC14) will have a significant negative impact on the character and quality of our immediate and surrounding neighbourhood as well as placing unacceptable pressure on transport, stormwater and wastewater infrastructure in the local area.

To illustrate by example - in the last year, Council relaxed on-site parking requirements for new developments (typically to one space per residential unit) has already had a significant impact in many locations. The recent allowance to there being no on-site carparks required for new developments, and now the proposed change for High Density Residential Zone (HRZ) and Medium Density Residential Zone (MRZ) to also not be required to make provision for ANY on-site parking and place additional pressure on basic transport infrastructure which will inexorably increase the impact in the Strowan neighbourhood.

## 1. INFRASTRUCTURE

Relevant PC14 clause references and extracts are given in **RED italics following**

### *Section 14.2.8.5 Policy – Infrastructure servicing for developments*

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

### *Section 14.2.8.6 Policy – Integration and connectivity*

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

I suggest that it is universally accepted that 'infrastructure' includes adequate carparking and a safe and effective transport network which does not contribute to traffic congestion. and a functioning and effective stormwater and wastewater network.

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

- the supply of on-street carparking spaces currently cannot keep-up with the demand for carparking, resulting in the very recent expansion of time-based (two hour maximum) parking restrictions on most surrounding streets. The presence of St Andrews' College, which defines the southeast limit of Strowan, a Year 1-13 school and preschool, is the most significant contributor. The school has a roll of 1700 students and around 250 teachers and staff with only minimal on-site parking provided. Day students who hold a drivers licence drive from all parts of greater Christchurch to attend the College. St Andrews' College, established in 1917, has effectively become a 'destination, independent school of choice' as it is the only co-educational, preschool, primary and secondary school in the South Island. The school is growing with a large waiting list for entry. The presence of the Waimairi Tennis Club in the neighbourhood also contributes to the overall pressure on on-street carparking. Any increase in housing density in the Strowan community (that is either MRZ or HRZ) will magnify this existing, significant on-street carparking problem as new housing developments are no longer required to provide any on-site carparking. Of particular concern is that the PC14 proposes to enable HRZ along Papanui Road and one block either side of Papanui Road which is obviously at a higher level of intensification than even MRZ. As there is little on-street carparking permitted on Papanui Road (none for five hours on weekdays due to the presence of priority bus lanes), and no on-site carparking required for new residential developments, carparking associated with ALL of this intensification will further exacerbate the carparking issues in the Strowan community;
- the existing traffic management issues associated with St Andrews' College also pose a significant health and safety issue – from morning and afternoon congestion in Normans Road and surrounding streets at school drop-off and pick-up times, drivers double parking and parking over broken yellow lines and 'rat running' around the Strowan streets to seek to avoid congestion, causing delays and congestion at intersections linking with surrounding primary roads including Papanui Road and Strowan Road. All of these issues will be exacerbated by the proposed intensification of residential development in the community but especially by the proposed HRZ over many blocks,

Relevant PC14 clause references and extracts are given in **RED italics following**

## Section 14.6.2 Built form standards

*a The following built form standards shall be met by all permitted activities and restricted discretionary activities RD2, unless otherwise stated.*

*Advice note:*

*1. There is no spare, or limited, wastewater, storm water, or water supply infrastructure capacity in some areas of Christchurch City which may create difficulties in granting a building consent for some developments. Alternative means of providing for those services may be limited or not available. Compliance with the District Plan does not guarantee that connection to the Council's reticulated infrastructure is available or will be approved. Connection to the Council's reticulated infrastructure requires separate formal approval from the Council. There is a possibility that approval to connect will be declined, or development may trigger the need for infrastructure upgrades or alternative servicing at the developer's cost.*

I am referring to this Clause as it is not obvious where else this issue is covered.

My specific concerns in relation to the impact of the proposed changes on the stormwater and wastewater networks in our local community of Strowan are as follows:

- there are already pockets of flooding in rainfall events in Strowan – with Brenchley Avenue being one example where both the stormwater and wastewater networks do not cope in these events. HRZ intensification of the extent proposed in PC14 will exacerbate this across the neighbourhood. This is a known consequence of urban intensification in Christchurch (and elsewhere) as a greater density of 'hard' surfaces (eg roof, yard, path and paved areas) is created and a consequential reduction in 'soft' surfaces (eg grass, landscape areas) which unquestionably increases the flow rates of stormwater discharge to the side channel and gives rise to infiltration of this uncontrolled stormwater into the wastewater system giving rise to overflows and resulting sewage contamination of waterways, streams and surface water. (The serious flooding in many parts of Auckland over the period 27 February-2 February 2023 highlighted this impact of urban intensification dramatically). All of these issues will be exacerbated by the proposed intensification of residential development in the community but especially by the proposed HRZ over many blocks, immediately adjacent to the current problem areas.

## 1. AMENITY/CHARACTER

Relevant PC14 clause references and extracts are given in **RED italics** following

### *Section 14.2.4.2 Policy – High quality, medium density residential development*

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

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

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

- the Strowan neighbourhood has an amenity character and fabric and a sense of community which is very attractive to residents, which is highly valued and worthy of retention. This is comprised of a number of elements including:
  - there is still a significant proportion of older, quality homes;
  - the homes are typically on larger than average sections so a sense of open space is still present;
  - there are a number of prominent trees and landscaping on properties which reinforces both the perception and reality of quality open space 'around' buildings (and which clearly

- supports the Council's Urban Forest Plan 2023 initiative);
- o the small number of new homes which have been built are typically two storey, with the scale, density and quality largely in keeping with the existing character and built form elsewhere in the Strowan community.

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

Relevant PC14 clause references and extracts are given in **RED italics following**

### *Section 7.2.1.2 Policy – High trip generating activities*

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

### *Section 7.2.1.5 Policy – Design of Carparking areas and loading areas*

*iii be accessible for people whose mobility is restricted*

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

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

This impact will be significant on both

- existing residents and
- residents living in new developments

as increasingly they and their visitors will not be able to expect and/or rely on their ability to park close to their place of residence. This will be exacerbated significantly in the Strowan area where the current on-street carparking supply does not meet demand and this is a further reason why the proposed HRZ must not be implemented. I have been unable to find any specific references in PC14 as to how the transitional change (clearly over many years) will impact on the needs of these vulnerable groups in our community and how it will be mitigated. If this is the case it is very concerning that PC14 is so lacking in provision.

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

Relevant PC14 clause references and extracts are given in **RED italics following**

### *Section 14.2.7 Objective – High Density Residential Zone*

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

### *Section 14.2.7.2 Policy – High density location*

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

*i. City centre zone;*



*ii. Town Centre zones of Riccarton, Papanui, and Hornby; and*

*iii. Other larger commercial centres zoned as Town Centres and Local Centres; to a degree that responds to the planned scale and nature of each centre group and the range of activities planned or provided there.*

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

In requesting a change in PC14 as proposed, I would highlight the following anomaly. I have studied 'The proposed zones' (on page 9 of the Consultation document) and my analysis has been confirmed by relevant Council staff, that the specific intention is to have a proposed 'Larger Town Centre' zone in the vicinity of the Merivale commercial centre with an associated HRZ stretching as far north as Heaton Street/Innes Road. In a similar manner, it is clear that a proposed 'Larger Town Centre' zone be created in the vicinity of the Papanui commercial centre with an associated HRZ stretching as far south as Blighs Road. But the planning maps contradict this and show these HRZ areas as joined or continuous along the spine of Papanui Road.

I suggest therefore that the significant infrastructure pressure and other issues which I have highlighted in this submission, which are already impacting the Strowan community particularly in the vicinity of St Andrews' College, could be mitigated by Council following the approach which they themselves have outlined in the Consultation document. That is, by limiting the HRZ as detailed (north from the Merivale commercial centre to Heaton Street/Innes Road and south from the Papanui commercial centre to Blighs Road) and not extending the HRZ along this stretch of Papanui Road through the Strowan community.

### **Conclusion/Recommendation**

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

I seek that this change be made by way of 'Area limited by Qualifying Matters' or other appropriate means for the following reasons:

- the area has existing significant infrastructure issues (including carparking, vehicle congestion, flooding issues which impact both stormwater and wastewater systems);
- the presence of St Andrews' College is important. Whilst the College undoubtedly enhances and reinforces the character of the neighbourhood, the impact of its attraction to families across the city as providing education of a 'special character', means that the College's current and future growth places pressure on the local community (in terms of carparking, traffic congestion)
- the amenity value of the neighbourhood would be negatively impacted. There is a character of older quality housing on larger than average sections which reinforces the reality of open space, and recent low rise (typically two storey), new housing developments of a consistent appropriate quality suitable for families, where many existing trees have been retained with on-site carparking provided;
- the sense of community which is present and increasing would be undermined by the scale of intensification which is proposed under HRZ;
- there are a number of prominent trees remaining in the neighbourhood which reinforces the quality of open space and clearly supports the Council's Urban Forest Plan 2023 initiative; but which would inevitably be threatened with the high level of intensification under HRZ as proposed in Plan Change 14.

Noting that the following extract is taken from Council's PC14 documentation

*Areas limited by Qualifying Matters*

*Not all parts of our city are suitable for the level of increased development. Some areas have qualities, known as Qualifying Matters, which mean rules enabling increased development will be modified to maintain and protect those qualities or manage their effects.*

*This may include keeping a lower level of residential density and building heights, or managing development through specified matters and resource consent conditions*

The other important factors to take into account are that we already have a problem with pooling on our property and we already have a high level of anxiety associated with external events and this process is adding to it.

Thank you for the opportunity to make a submission.

Keri Murison

69a Halton Street

Strowan

keri.murison@xtra.co.nz

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Attached Documents

| File                                  |
|---------------------------------------|
| Submission document from Keri Murison |

## Christchurch District Plan

## Plan Change 14

I live in Halton Street, Strowan and I am concerned that the proposed Housing and Business Choice Plan Change 14 (PC14) will have a significant negative impact on the character and quality of our immediate and surrounding neighbourhood as well as placing unacceptable pressure on transport, stormwater and wastewater infrastructure in the local area.

To illustrate by example - in the last year, Council relaxed on-site parking requirements for new developments (typically to one space per residential unit) has already had a significant impact in many locations. The recent allowance to there being no on-site carpark required for new developments, and now the proposed change for High Density Residential Zone (HRZ) and Medium Density Residential Zone (MRZ) to also not be required to make provision for ANY on-site parking and place additional pressure on basic transport infrastructure which will inexorably increase the impact in the Strowan neighbourhood.

### 1. INFRASTRUCTURE

Relevant PC14 clause references and extracts are given in **RED italics following**

*Section 14.2.8.5 Policy – Infrastructure servicing for developments*

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

*Section 14.2.8.6 Policy – Integration and connectivity*

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

I suggest that it is universally accepted that 'infrastructure' includes adequate carparking and a safe and effective transport network which does not contribute to traffic congestion. and a functioning and effective stormwater and wastewater network.

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

- the supply of on-street carparking spaces currently cannot keep-up with the demand for carparking, resulting in the very recent expansion of time-based (two hour maximum) parking restrictions on most surrounding streets. The presence of St Andrews' College, which defines the southeast limit of Strowan, a Year 1-13 school and preschool, is the most significant contributor. The school has a roll of 1700 students and around 250 teachers and staff with only minimal on-site parking provided. Day students who hold a drivers licence drive from all parts of greater Christchurch to attend the College. St Andrews' College, established in 1917, has effectively become a 'destination, independent school of choice' as it is the only co-educational, preschool, primary and secondary school in the South Island. The school is growing with a large waiting list for entry. The presence of the Waimairi Tennis Club in the neighbourhood also contributes to the overall pressure on on-street carparking. Any increase in housing density in the Strowan community (that is either MRZ or HRZ) will magnify this existing, significant on-street carparking problem as new housing developments are no longer required to provide any on-site carparking. Of particular concern is that the

PC14 proposes to enable HRZ along Papanui Road and one block either side of Papanui Road which is obviously at a higher level of intensification than even MRZ. As there is little on-street carparking permitted on Papanui Road (none for five hours on weekdays due to the presence of priority bus lanes), and no on-site carparking required for new residential developments, carparking associated with ALL of this intensification will further exacerbate the carparking issues in the Strowan community;

- the existing traffic management issues associated with St Andrews' College also pose a significant health and safety issue – from morning and afternoon congestion in Normans Road and surrounding streets at school drop-off and pick-up times, drivers double parking and parking over broken yellow lines and 'rat running' around the Strowan streets to seek to avoid congestion, causing delays and congestion at intersections linking with surrounding primary roads including Papanui Road and Strowan Road. All of these issues will be exacerbated by the proposed intensification of residential development in the community but especially by the proposed HRZ over many blocks,

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*Section 14.6.2 Built form standards*

*a The following built form standards shall be met by all permitted activities and restricted discretionary activities RD2, unless otherwise stated.*

*Advice note:*

*1. There is no spare, or limited, wastewater, storm water, or water supply infrastructure capacity in some areas of Christchurch City which may create difficulties in granting a building consent for some developments. Alternative means of providing for those services may be limited or not available. Compliance with the District Plan does not guarantee that connection to the Council's reticulated infrastructure is available or will be approved. Connection to the Council's reticulated infrastructure requires separate formal approval from the Council. There is a possibility that approval to connect will be declined, or development may trigger the need for infrastructure upgrades or alternative servicing at the developer's cost.*

I am referring to this Clause as it is not obvious where else this issue is covered.

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- there are already pockets of flooding in rainfall events in Strowan – with Brenchley Avenue being one example where both the stormwater and wastewater networks do not cope in these events. HRZ intensification of the extent proposed in PC14 will exacerbate this across the neighbourhood. This is a known consequence of urban intensification in Christchurch (and elsewhere) as a greater density of 'hard' surfaces (eg roof, yard, path and paved areas) is created and a consequential reduction in 'soft' surfaces (eg grass, landscape areas) which unquestionably increases the flow rates of stormwater discharge to the side channel and gives rise to infiltration of this uncontrolled stormwater into the wastewater system giving rise to overflows and resulting sewage contamination of waterways, streams and surface water. (The serious flooding in many parts of Auckland over the period 27 February-2 February 2023 highlighted this impact of urban intensification dramatically). All of these issues will be exacerbated by the proposed intensification of residential development in the

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## 2. AMENITY/CHARACTER

Relevant PC14 clause references and extracts are given in **RED itallics following**

*Section 14.2.4.2 Policy – High quality, medium density residential development*

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

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

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

## 3. LACK OF CARPARKING PROVISION FOR VULNERABLE MEMBERS OF OUR COMMUNITY

Relevant PC14 clause references and extracts are given in **RED itallics following**

*Section 7.2.1.2 Policy – High trip generating activities*

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

*Section 7.2.1.5 Policy – Design of Carparking areas and loading areas*

*iii be accessible for people whose mobility is restricted*

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

- people with disabilities;
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This impact will be significant on both

- existing residents and
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as increasingly they and their visitors will not be able to expect and/or rely on their ability to park close to their place of residence. This will be exacerbated significantly in the Strowan area where the current on-street carparking supply does not meet demand and this is a further reason why the proposed HRZ must not be implemented. I have been unable to find any specific references in PC14 as to how the transitional change (clearly over many years) will impact on the needs of these vulnerable groups in our community and how it will be mitigated. If this is the case it is very concerning that PC14 is so lacking in provision.

#### **4. CHANGE FROM HRZ TO MRZ IN STROWAN – SO AS TO BE CONSISTENT WITH STATED INTENTION**

Relevant PC14 clause references and extracts are given in **RED itallics following**

##### *Section 14.2.7 Objective – High Density Residential Zone*

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

##### *Section 14.2.7.2 Policy – High density location*

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

*i. City centre zone;*

*ii. Town Centre zones of Riccarton, Papanui, and Hornby; and*

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

In requesting a change in PC14 as proposed, I would highlight the following anomaly. I have studied 'The proposed zones' (on page 9 of the Consultation document) and my analysis has been confirmed by relevant Council staff, that the specific intention is to have a proposed 'Larger Town Centre' zone in the vicinity of the Merivale commercial centre with an associated HRZ stretching as far north as Heaton Street/Innes Road. In a similar manner, it is clear that a proposed 'Larger Town Centre' zone be created in the vicinity of the Papanui commercial centre with an associated HRZ stretching as far south as Blighs Road. But the planning maps contradict this and show these HRZ areas as joined or continuous along the spine of Papanui Road.

I suggest therefore that the significant infrastructure pressure and other issues which I have highlighted in this submission, which are already impacting the Strowan community particularly in the vicinity of St Andrews' College, could be mitigated by Council following the approach which they themselves have outlined in the Consultation document. That is, by limiting the HRZ as detailed (north from the Merivale commercial centre to Heaton Street/Innes Road and south from the Papanui commercial centre to Blighs Road) and not extending the HRZ along this stretch of Papanui Road through the Strowan community.

### **Conclusion/Recommendation**

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

I seek that this change be made by way of 'Area limited by Qualifying Matters' or other appropriate means for the following reasons:

- the area has existing significant infrastructure issues (including carparking, vehicle congestion, flooding issues which impact both stormwater and wastewater systems);
- the presence of St Andrews' College is important. Whilst the College undoubtedly enhances and reinforces the character of the neighbourhood, the impact of its attraction to families across the city as providing education of a 'special character', means that the College's current and future growth places pressure on the local community (in terms of carparking, traffic congestion)
- the amenity value of the neighbourhood would be negatively impacted. There is a character of older quality housing on larger than average sections which reinforces the reality of open space, and recent low rise (typically two storey), new housing developments of a consistent appropriate quality suitable for families, where many existing trees have been retained with on-site carparking provided;
- the sense of community which is present and increasing would be undermined by the scale of intensification which is proposed under HRZ;
- there are a number of prominent trees remaining in the neighbourhood which reinforces the quality of open space and clearly supports the Council's Urban Forest Plan 2023 initiative; but which would inevitably be threatened with the high level of intensification under HRZ as proposed in Plan Change 14.

Noting that the following extract is taken from Council's PC14 documentation

#### *Areas limited by Qualifying Matters*

*Not all parts of our city are suitable for the level of increased development. Some areas have qualities, known as Qualifying Matters, which mean rules enabling increased development will be modified to maintain and protect those qualities or manage their effects.*

*This may include keeping a lower level of residential density and building heights, or managing development through specified matters and resource consent conditions*

The other important factors to take into account are that we already have a problem with pooling on our property and we already have a high level of anxiety associated with external events and this process is adding to it.

Thank you for the opportunity to make a submission.

Keri Murison

69a Halton Street

Strowan

keri.murison@xtra.co.nz



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

### Submitter Details

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

**First name:** Edward **Last name:** Jolly

**Preferred method of contact** Email

**Postal address:** 4 Albert Terrace, Saint

Martins, Christchurch 8022

**Suburb:** Saint Martins

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8022

**Email:** edwardjolly@gmail.com

**Daytime Phone:** 021552753

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:** 69.1

- 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**

Urban Design Certification Consenting Pathway and Mana Whenua Engagement

I understand that the Urban Design Certification consenting pathway will be carried through in PC 14 to the Commercial Central City Zones, and Commercial Core Zone.

My submission is based on working experience of the urban design certification process (as I am one of the appointed Urban Design Certifiers) and concerns I have with it in relation to engagement with Mana Whenua. Specifically, the requirement through urban design assessment matters for the certifier to engage mana whenua and account for their input into the consenting process.

There are two fundamental concerns

1. Council nor the applicant are involved in the engagement process with Mana Whenua. The process relies on the certifying expert to engage with mana whenua separately and without involvement of the consenting authority or applicant.
2. Mana Whenua have limited resources in the urban design realm to engage. As I understand Matapopore whom have represented Ngāi Tūāhuriri Rununga in urban design matters currently have limited resource to undertake this role.

I am a strong advocate for Mana Whenua involvement in the consenting process (where they deem it necessary) however, I do not believe that it is appropriate for this engagement to be carried out under the urban design assessment criteria and specifically through the certified urban design process that circumvents Councils involvement.

My advice is that CCC under its **Te Tiriti o Waitangi** obligations should undertake a separate and direct engagement process with Mana Whenua to a level negotiated between these parties whom jointly develop associated mechanisms within the plan.

Although I am not a planner or legal expert I consider that under Plan Change 14 a new section of the plan should be introduced that stands alone to provide this mechanism.

#### Current Plan Requirements

Currently the mechanism for engagement of Mana Whenua in relation to urban design certification is through activities that meet the specific controlled activity status in the Commercial Core Zone, Commercial Central City Zone and the Commercial Central City (South Frame) Mixed Use Zone. Engagement with Mana Whenua becomes an assessment matter under these controlled activities.

Current urban design certification activities and assessment criteria:

Commercial Core Zone,

*15.4.2.1 Built form standards urban design (b) Controlled activity,*

and assessment matters;

*15.13.1 Urban Design (a) The extent to which the development: ix Where within a Site of Ngāi Tahu Cultural Significance identified in Appendix 9.5.6, the matters set out in Rule 9.5.5 as relevant to the site classification:*

*Rule 9.5.5.1 – Wāhi Tapu / Wāhi Taonga, Mahaanui Iwi Management Plan Silent Files and Kaitōrete Spit;*

*Rule 9.5.5.2 – Ngā Tūranga Tūpuna; and*

*Rule 9.5.5.3 – Ngā Wai.*

Commercial Central City Zone,

*15.10.1.2, Controlled activities*

and assessment matters:

15.13.2.6 Commercial Central City Business Zone urban design (a) *The extent to which the development ii - in having regard to the relationship of Ngai Tūāhuriri/ Ngai Tahu with Ōtautahi as a cultural element, consideration should be given to landscaping, the use of Te Reo Maori, design features, the use of locally sourced materials, and low impact design principles as is appropriate to the context*

Commercial Central City (South Frame) Mixed Use Zone,

15.12.1.2, *Controlled activities*

and assessment matters:

15.13.2.11 *Urban Design in the Commercial Central City (South Frame) Mixed Use Zone e) In having regard to the relationship of Ngai Tūāhuriri/ Ngai Tahu with Ōtautahi as a cultural element, consideration should be given to landscaping, the use of Te Reo Maori, design features, the use of locally sourced materials, and low impact design principles as is appropriate to the context.*

---

Attached Documents

| File                   |
|------------------------|
| No records to display. |

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

## Submitter Details

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

**First name:** Mary-Louise **Last name:** Hoskins

**Preferred method of contact** Email

**Postal address:** 9 Conference Street

**Suburb:** Christchurch Central

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8013

**Email:** marylouisehoskins@gmail.com

**Daytime Phone:** 021750635

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:** 70.1

- 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

My husband and I relocated to Christchurch from Auckland in mid 2022. A large part of the appeal of Christchurch is the vision the Council in full consultation with the citizens and ratepayers of Otutahi had developed after the catastrophic earthquakes – referred to as the blueprint. This set a vision of a low-rise city, designed to offer work-life balance and strength of community. That blueprint had a 30+ year horizon for growth. The council now appears to have taken out the red pen and scrapped that blueprint – to a much greater extent than is dictated by the Enabling Housing Supply Amendment bill. We strongly feel that it is imperative that Christchurch continue to set itself apart from the cities such as Auckland where there is little sole or community. Much better that we set out sights to be more akin to a European city such as Paris. There is much at risk, and the Council needs to step back from the precipice they are standing before.

Of specific and particular concern are:

- 92m height limit for the Central City, combined with the extent of that zone. There is an abundance of vacant land in and around the city. Just one building of this height (92m) will not only look peculiarly out of place, it will soak up the tenants and businesses for years to come creating near ghost towns around them. If there are to be such significant high rise, then ensure that these are done with great architectural merit to build on the fine bones ChCh now has. Think of skyscrapers akin to the Shard in London, not the totally uninspiring highrise that dominate the Auckland skyline. Make sure Christchurch continues its current trajectory of fine restored old buildings such as the Arts Centre juxtaposed with great modern designs such as Te Pae.
- The extent of that Central City high density zone is too great and unnecessary. Contain the super highrise (if we must have them at all) to the central area, with a view to reviewing that zoning every 5 years as the city develops.
- The Sunlight qualifier - this only adjusts the equation to put ChCh the same as Akld. ChCh is a much colder climate and needs more sunlight to compensate. There is a direct correlation between sunlight and mental health. This is too important to get wrong.
- The financial contribution where the grassed area &/or tree canopy do not meet the guidelines - this must be very significant else developers will ride roughshot over it.
- Min of 2 storeys for any dwelling in a high-density zone. This will disadvantage residents, particularly elderly who will need to have a bedroom on the ground floor and will not want/need a second level. IF this MUST be implemented, then a lift should also be mandated.

### Attached Documents

| File                   |
|------------------------|
| No records to display. |

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

## Submitter Details

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

**First name:** Larissa **Last name:** Lilley

**Preferred method of contact** Email

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** tee.rockers0m@icloud.com

**Daytime Phone:** 0221564591

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:** 71.1

- 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 high density proposed areas in Hornby and Her-Hei should be stopped. This is a residential area and should be kept as such. developers should not be allowed to build these new style town houses in these areas.

Council should focus high density building in the city centre where it is to be expected as well as start new

developments in New Brighton and red zone areas which are being rebuilt.

Crime in Hornby is on the rise and traffic congestion is increasing by the week.

**My submission is that**

Hornby and the west side of Christchurch is getting far too populated. Crime is rising and traffic is become congested.

Hornby and sourranging areas should not be high density as these are residential areas. high density needs to be for the city centre only. Family live here and it is not appropriate.

Hornby is not the city centre and a lot of of Hornby residents are extremely unhappy about the increase in townhouses being built especially down Amys road and sourranging areas.

Instead areas such as New Brighton where it is being rebuilt and town/red zone areas should be allocated high density.

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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:** 11/05/2023

**First name:** Debra **Last name:** August-Jordan

**Preferred method of contact** Email

**Postal address:** 7 Dymock Place

**Suburb:** Bishopdale

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8053

**Email:** debdalj@gmail.com

**Daytime Phone:** 0211105598

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:** 72.1

- 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***

Stop the intensification and squeezing us out of our homes into a pre-determined plan for making as many people as possible into designated areas.

**My submission is that**

Will you, as Counsellors, be happy to have houses removed from around your own home to have a multi storey building built?

The ISPP (Intensification Streamlined Planning Process) has been introduced by the Government. Why?? We are being dictated to and our Local Government need to be standing up to what is happening.

The planned intensification that is being dictated to Local Government by the Government has us all planned to be living in pre-allocated areas with increased numbers. We are expected to be able to live in multi-storey buildings and not have opportunities to be able to have a garden or even pets from what I have seen being built. Having observed these being built around Christchurch, the removal of a number of houses in a group and then building an obscene amount in its place. This is obviously planning to be a rates gathering area by replacing multiple buildings on what may have previously been one or two properties. Some of the properties that are now around these buildings, will now have lack of sun and privacy will be non-existence from upper levels.

If we are to be limited to travel by walking, scootering and if lucky public transport etc to get from a to b in a 15 minute time frame (as per survey I completed, 15 minutes was mentioned regularly) then how are we supposed to travel to see family outside of this area. What if we cannot get to work, the doctors etc as was also asked. What is the alternative for those who cannot do these things in 15 minutes? I would also mention that, when are considerations going to be allowed for those people who are unable to walk or maneuver around but also if there are multi-storey buildings being built, are these for people who can walk up and down stairs only? Having seen the plan of having up to 4 storey buildings in Bishopdale are as noted on The proposed zones map doesn't make any sense for when this height is built. How can the consideration of shading over existing properties be allowed for? Streets are obviously to be narrowed too, so that those who have cars are limited to where they can be parked. If this is the only means of transport for someone unable to walk etc where are they supposed to park their vehicle?

Infrastructure should be at the forefront of the planning minds as when connecting these buildings to what drinking water, stormwater, wastewater has been in place for decades. These should be upgraded long before thinking about putting up buildings. The pressure on these services, even now that so many buildings have been completed will be immense and create issues for all surrounding properties.

New subdivisions have been put in place without enough long term thinking of 'where is all the waste going to go!

## Attached Documents

| File                   |
|------------------------|
| No records to display. |

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

## Submitter Details

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

**First name:** Anne **Last name:** Ott

**Preferred method of contact** Email

**Postal address:** 28 Circuit Street

**Suburb:** Merivale

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8052

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

**Daytime Phone:** +64277148287

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:** 73.1

- 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 above

**My submission is that**

I believe the PC14 planning document prepared by the Council requires further changes. I have focused on the effects on Merivale but the points related to Recession planes and Privacy/Overshadowing are general.  
Traffic

The proposed plan change designates Merivale a Significant Town Centre (more on this below). This will allow residential buildings to be built to a height of 20m with a minimum set back of 1m on side boundaries. More particularly there is no requirement for parking spaces on site. Recent experience with multi unit housing shows these cars will be semi permanently parked on the roads. There can be no doubt that the people in the proposed new high rise developments will have cars – Christchurch, as recently reported, has the poorest uptake of public transport of all the major cities. The working from home trend increases the problem. The roads around Merivale Village, because of their longevity, are much narrower than is normal for Christchurch. It is important that city planners and traffic planners familiarise themselves with the narrow size of Cox St, Stirling St, Akela St, Office Rd (especially by the Mall), Rugby St (especially off Papanui Rd), Winchester St (by St Margarets), Andover St, Tonbridge St, Rastrick St, Shrewsbury St and Merivale Lane. These streets do not allow traffic to pass by with cars parked on either side. Some would struggle to allow 1 car to pass with cars parked on both sides. It is no use allowing significant intensification here when the narrow roading infrastructure simply will not support it. Traffic impact should be a qualifying matter for developments around these small feeder streets in Merivale. A precedent has been set on a significant suburban issue as a residential housing qualifying matter with the Shirley vacuum pump system storm water limit.

#### Merivale Significant Town Centre designation

It does not make sense that Merivale is accorded the same status in the revised plan as Sydenham. The scale of Sydenham shopping in terms of block coverage (2 blocks versus 5) and depth, range of retail and service outlets and width and scale of access and feeder roads is of a different level to Merivale. This was queried at the last consultation with town planners and it seems that the turnover of Merivale Centre was a significant ranking determinant. Surely the geographic extent and infrastructure of the Centre is more important than turnover as a primary assessment tool. I believe Merivale should be re-designated a Medium Town Centre with associated impact on residential zoning.

#### Recession Planes

I applaud the work the Council planners have done on changing the national recession plane measurements to reflect Christchurch latitude and sun position. The vital importance of sun access has been demoted in the planning process. The diagrams in the Council information summary though still show with the change winter sun as 3 months without sun at ground level which is unacceptable. Quite a bit of work has been done on this issue and the Australians, with considerably more housing density in their cities, have guaranteed 2 hours sunlight a day. We should ensure our recession planes for Christchurch meet the Australian standard.

#### Privacy/Overshadowing

The current District Plan has some specific protections for privacy in terms of setbacks, living area outlooks and window sizes. Such protections are really important because some developers have a liking for floor to ceiling windows overlooking the living area of neighbouring properties. These protections are now gone until the property requires a consent (ie. more than 14m high in the HRZ) and are quite vague. It is imperative that privacy issues are considered for all developments. The town planners do not know where the living area of the neighbouring houses are unless the affected party is part of the discussions. Where the developer, affected resident and town planner work together small changes that mitigate privacy issues can be achieved whilst not impairing the intensification objective. To do this privacy issues and outlook, particularly with respect to acceptable window sizes overlooking neighbouring living areas, must be part of the assessment process for ALL developments.

#### Attached Documents

| File                   |
|------------------------|
| No records to display. |

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

## Submitter Details

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

**First name:** David **Last name:** Ott

**Preferred method of contact** Email

**Postal address:** 28 Circuit Street

**Suburb:** Merivale

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8052

**Email:** 'david@agers.co.nz

**Daytime Phone:** 0211057296

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

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

Note to person making submission:

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

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 74.1

- 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 believe the PC14 planning document prepared by the Council requires further changes. I have focused on the effects on Merivale but the points related to Recession planes and Privacy/Overshadowing are general.

## Traffic

The proposed plan change designates Merivale a Significant Town Centre (more on this below). This will allow residential buildings to be built to a height of 20m with a minimum set back of 1m on side boundaries. More particularly there is no requirement for parking spaces on site. Recent experience with multi unit housing shows these cars will be semi permanently parked on the roads. There can be no doubt that the people in the proposed new high rise developments will have cars – Christchurch, as recently reported, has the poorest uptake of public transport of all the major cities. The working from home trend increases the problem. The roads around Merivale Village, because of their longevity, are much narrower than is normal for Christchurch. It is important that city planners and traffic planners familiarise themselves with the narrow size of Cox St, Stirling St, Akela St, Office Rd (especially by the Mall), Rugby St (especially off Papanui Rd), Winchester St (by St Margarets), Andover St, Tonbridge St, Rastrick St, Shrewsbury St and Merivale Lane. These streets do not allow traffic to pass by with cars parked on either side. Some would struggle to allow 1 car to pass with cars parked on both sides. It is no use allowing significant intensification here when the narrow roading infrastructure simply will not support it. Traffic impact should be a qualifying matter for developments around these small feeder streets in Merivale. A precedent has been set on a significant suburban issue as a residential housing qualifying matter with the Shirley vacuum pump system storm water limit.

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It does not make sense that Merivale is accorded the same status in the revised plan as Sydenham. The scale of Sydenham shopping in terms of block coverage (2 blocks versus 5) and depth, range of retail and service outlets and width and scale of access and feeder roads is of a different level to Merivale. This was queried at the last consultation with town planners and it seems that the turnover of Merivale Centre was a significant ranking determinant. Surely the geographic extent and infrastructure of the Centre is more important than turnover as a primary assessment tool. I believe Merivale should be re-designated a Medium Town Centre with associated impact on residential zoning.

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I applaud the work the Council planners have done on changing the national recession plane measurements to reflect Christchurch latitude and sun position. The vital importance of sun access has been demoted in the planning process. The diagrams in the Council information summary though still show with the change winter sun as 3 months without sun at ground level which is unacceptable. Quite a bit of work has been done on this issue and the Australians, with considerably more housing density in their cities, have guaranteed 2 hours sunlight a day. We should ensure our recession planes for Christchurch meet the Australian standard.

## Privacy/Overshadowing

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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:** 11/05/2023

**First name:** Robyn **Last name:** Wells

**Preferred method of contact** Email

**Postal address:** 38 Hartley Avenue

**Suburb:** Strowan

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8052

**Email:** morrie.robyn@gmail.com

**Daytime Phone:** 0274365773

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:** 75.1

- Support
- Oppose
- Seek Amendment

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

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

**My submission is that**

The Qualifying Matter, to protect sunlight access for homes, does not go nearly far enough. Why base this on Auckland? We have a much colder climate and sunlight is essential for our social, environmental, and economic

well-being (promoting the well-beings is one of the purposes of local government). We also have a different topography from Auckland, with most houses on the flat and more likely to be affected by the housing intensity changes.

In brief, adverse effects from allowing increased development without locking in absolute sun protection will include:

- increased heating costs for those affected, with a flow on effect on climate change
- related mental health issues
- loss of privacy
- loss of character
- decrease in property values

Other negative effects from allowing increased developments include:

- potential noise issues
- loss of outdoor space, which is essential for physical well being
- increased parking on streets
- nowhere for charging of electric vehicles and bikes

The developments need to be comprehensive developments with suitable greenery and off street parking, with no adverse effects on existing neighbouring properties.

I would ask the council to advocate for development in Christchurch to be based on not only the District Plan, which has been carefully developed over many years, but also our unique Christchurch blueprint developed with much consultation and input from experts after the earthquake.

In conclusion, while the qualifying matter is trying to mitigate adverse effects from the Medium-Density Residential Standards, I consider it will fail if left as currently proposed and the character and attractiveness of Christchurch will be irreparably damaged, both as a place to live and as a place to visit. The thought of living in a house with potentially no winter sun for three months of the year is a daunting prospect, in a climate where the winters are getting colder.

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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:** 11/05/2023

**First name:** Jack **Last name:** Gibbons

**Preferred method of contact** Email

**Postal address:** Unit 10, 16 Nova Place

**Suburb:** Christchurch Central

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8011

**Email:** gibbonsj97@gmail.com

**Daytime Phone:** 021546545

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

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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:

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 76.1

- Support
- Oppose
- Seek Amendment

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

Remove clause 14.6.2.2.b that requires setbacks in the HRZ zone for parts of the building over 14m

**My submission is that**

14.6.2.2.b

Remove this entire clause.

The current proposal will cap most high density HRZ housing at 3 to 4 stories.

The average street frontage in high density areas is 20m, leaving a potential building 6m wide over 14m in height. This sinks the economics of building over 14m in height. This is before considering that a considerable amount of that street frontage is on corner sites, which are themselves severely limited by the max 60% depth rule.

There is a considerable jump in costs to go past 3 stories as lifts are required plus other building engineering considerations. Developers need big enough floor plates high in the building to make 4+ stories pencil out.

Developers will not amalgamate sites. I assume that the planners are expecting developers to amalgamate sites in order to deliver 6 stories. Experience in Auckland with the unitary plan shows this is too hard to achieve, and has resulted in low rise townhouses filling the areas earmarked for 6 story apartments. Auckland is now changing their THAB zone (our HRZ zone) to remove most setbacks because of this failure. We should learn from Aucklands experience and not repeat their mistakes. Commissioners and independent reviewers will know this amalgamation game does not work and will expect changes.

This clause does not comply with the NPS-UD law. Commissioners and the housing minister will take a dim view of the severe restriction on buildings over 4 stories, when 6 legally have to be allowed in high density areas.

**Original Submitter:****Original Point:****Points:** 76.2

- 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***

14.6.2.2.c.iv A and B

Deepen the allowable building to 21.5m to account for front setbacks (or remove front setbacks)

Remove or raise the 60% rule to 80% or 90% on corner sites.

**My submission is that**

14.6.2.2.c.iv A and B

Deepen the allowable building to 21.5m to account for front setbacks (or remove front setbacks)

Remove or raise the 60% rule to 80% or 90% on corner sites.

Corner Sites are typically narrow, with lots of road frontage. They can make the most livable apartments with plenty of light access, and perfectly facing the street. Exactly as the planners are intending with the overall perimeter block rules. However 60% is very punishing as corner sites are usually rectangular and very shallow when measured from the long edge as the rules dictate. This commonly does not leave viable building depth.

Represents a severe restriction on some sites and does not allow them to be built to 6 stories, not compliant with NPS-UD

The 20m site depth is eaten up by the 1.5m front yard setbacks. Deepen the allowable building depth in this clause to 21.5m to account for this loss of floor area from the front of the plot.

**Original Submitter:****Original Point:****Points:** 76.3

- 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*

14.6.2.3.a

Change side and front setbacks to 0m.

**My submission is that**

14.6.2.3.a

Change side and front setbacks to 0m. The front setback serves no real purpose. Gardens are almost always neglected. Council should plant street trees to achieve canopy and streetscape goals, not try and outsource to building owners. Side yards are simply a waste of land. They lower building energy efficiency, add considerable surface area for cladding, and eat into floor plates. Building residents will have to own this strip of land, they should be able to benefit from it by adding more internal floor area.

**Original Submitter:**

**Original Point:**

**Points:** 76.4

- 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*

4.5.2.6.b.iv

Expand the application of Local Center Intensification Precincts to more centres / more area of the city. Namely within a 200m walking catchment of a group of commercial zoned land, larger than 3000sqm.

Explore ways to make the local center intensification precinct more permissive.

**My submission is that**

4.5.2.6.b.iv

The Local Center Intensification precinct is a good way to meet the NPS-UD requirements of upzoning around local centers. Perimeter blocks belong in these zones, encouraging the front loading of development is good. However it is too limited in its application, and is too restrictive.

Expand the application of Local Center Intensification Precincts to more centres. Namely within a 200m walking catchment of a group of commercial zoned land, larger than 3000sqm. Adding more local center intensification precincts will allow more people to live nearby to services and in areas with higher amenity than most of the suburbs. Development is going to happen, it might as well be concentrated as much as practicable around centers, these are generally easier to serve with public transport as well.

The application of the Local center intensification precinct has been extremely limited. This is not compliant with the NPS-UD. There are many local centers, with large format supermarkets, over 5000sqm in size which do not have any additional upzoning applied. For example Fendleton town center, Stanmore (near the new world), Beckenham, Shirley, and St Martins, plus others. Sometimes these local centers have been incorrectly zoned as neighborhood center zones, the proposed district plan states neighborhood centers are no larger than 3000sqm. Yet there are many NCZ's with many times that area.

Raise the height before setbacks kick in to 15m, and reduce those setbacks by 2m on each side. This will be more commiserate with the zoning in local centers as required by the NPS-UD.

Expand the application of Local Center Intensification Precincts to more centres. Namely within a 200m walking catchment of a group of commercial zoned land, larger than 3000sqm.

Explore ways to make the local center intensification precinct more permissive.

**Original Submitter:**

**Original Point:**

**Points:** 76.5

- 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***

14.5.2.6.a

Add an option that reduces recession planes in the front 20m of the plot, in return for meeting larger shared yard and tree planting requirements.

**My submission is that**

14.5.2.6.a

Add the option of front loading development through the entire MRZ zone. The arguments for front loading that the planners are buying for the more intense areas of the city apply just as well in the less intense areas too. Prevents sausage development, improves streetscapes, consolidates land into a large shared yard, improves outlooks. This could make up for the council suppressing construction in the MRZ with the sunlight QM.

**Original Submitter:**

**Original Point:**

**Points:** 76.6

- 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***

Expand Local Center Intensification Precinct to surround every grouping of shops with more than 3000sqm of land, including shops that are not zoned commercially, but are residentially zoned, directly adjoining commercially zoned land.

**My submission is that**

Smaller commercial zones are not receiving intense enough residential zoning nearby. The NPS-UD states the council must upzone to a level "commensurate" with the zoned activity within the commercial centers. This is to create vibrant healthy economically prosperous town centers, these need housing within walking distance. In practice this means every grouping of more than 10 or so shops (~3000sqm) should be surrounded by at least 200m catchment of Local Centre Intensification Precinct overlay. This has not been happening at all.

**Original Submitter:**

**Original Point:**

**Points:** 76.7

- 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***

Rezone all Neighborhood Center Zones (NCZ)'s larger than 3000sqm as as Local Center Zone (LCZ). Council's own planning documents state that NCZs should be no larger than 3000sqm, yet there are instances all over the city where contiguous 5000sqm+ areas zoned as NCZ. (chapter 15)

**My submission is that**

Rezone all Neighborhood Center Zones (NCZ)'s larger than 3000sqm as as Local Center Zone (LCZ). Council's own planning documents state that NCZs should be no larger than 3000sqm, yet there are instances all over the city where contiguous 5000sqm+ areas zoned as NCZ. (chapter 15)

Especially as the city intensifies and grows, the neighbourhood center zones will become considerably busier. It is always better to

start from a higher zone and get buildings commiserate with the future use of the area, rather than locking in today's heights.

**Original Submitter:**

**Original Point:**

**Points:** 76.8

- 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*

Remove the public transport QM. It is exceedingly poorly executed, appearing to arbitrarily favour certain neighbourhoods. Large portions of the area currently covered by the QM is well accessed by rapid transit bus routes on 15 minute headways. And even more will be in the immediate future with the bus upgrades being done at the moment.

**My submission is that**

The council's methods for deciding what is not well accessed by public transport is opaque and is producing highly unusual results. For example the entire suburb of Mt Pleasant has been marked off as having poor public transport access. However large parts are within the walking catchment of bus stops on the 3 route. This is a premier bus route of Christchurch, running every 10 minutes all day from Sumner to the Airport via the central bus interchange. Mt Pleasant also has a local bus covering the rest of the suburb with half hourly service. All in all better PT than most of the city, people would be well served if they were allowed to build and live here. There are examples of very strange decisions like this all over the city, particularly on the Orbiter route.

The council has made no mention of how the Qualifying Matter will be reviewed. The plan change process is complex and time consuming for city planners. If this qualifying matter needs to be reviewed every time that metro improves a service then it will likely simply not happen. Defeating the supposed purpose of the QM and unnecessarily restricting more homes, and while also stalling public transport investment.

There are also large improvements being made to the bus system which make all of this more nonsensical.

**Original Submitter:**

**Original Point:**

**Points:** 76.9

- 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*

Add better bicycle parking requirements

**My submission is that**

Support improving bicycle parking outcomes. We seek further improvements in the standards as there are a number of poor outcomes in the current district plan. Uncovered and unsecured leading to damage and theft issues. Hanging racks which are unusable by some people and some bicycles. Actual costs and space usage would still be relatively low with better bicycle parking, and can still partially be dense (easily usable) double stack racks. But it is very difficult to retrofit space and needs to be incorporated into new development

**Original Submitter:**

**Original Point:**

**Points:** 76.10

- 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*

Airport noise QM

Change the Airport noise contour to place additional requirements on noise proofing, and let builders / the market decide if it is still worth building in this area.

**My submission is that**

The airport noise contour thrusts deep into the city covering a considerable amount of urban land. Council is proposing to prevent all zone changes in this area, exempting it from the MDRS / NPS-UD. The area is already urbanized, with plenty of existing residents, and is otherwise indistinguishable from elsewhere in the suburbs. It also covers some areas that should be HRZ. Other councils in New Zealand handle airport noise in areas like this by mandating improved noise insulation in the construction of new buildings, leaving the zoning as it otherwise would be. There is no just explanation why the council has chosen to suppress all construction over this option

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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:** 11/05/2023

**First name:** Donna **Last name:** Kenton-Smith

**Preferred method of contact** Email

### Postal address:

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** bumpers.swoops.07@icloud.com

### Daytime Phone:

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.

## Attached Documents

File

Planning proposals - CCC

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

## Submitter Details

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

**First name:** Donna **Last name:** Kenton-Smith

**Organisation:** WE LOVE MERIVALE -

PETITION

**Preferred method of contact** Email

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** donnakenton@gmail.com

**Daytime Phone:**

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.

## Attached Documents

File

224 Petition Signers PDF

Comments - We Love Merivale Petition PDF



| Name                 | City             | State | Postal Code | Country     |
|----------------------|------------------|-------|-------------|-------------|
| Donna Kenton-Smith   |                  |       |             | New Zealand |
| Sally Hargreaves     | Christchurch     |       | 8014        | New Zealand |
| Amanda Redmayne      | Christchurch     |       |             | New Zealand |
| Lis Jones            | Christchurch     |       |             | New Zealand |
| Sue Sewell           |                  |       |             | New Zealand |
| Zoe Shakespeare      |                  |       |             | New Zealand |
| Tracey MacArthur     | Christchurch     |       |             | New Zealand |
| Peter Johnston       | Christchurch     |       |             | New Zealand |
| Cathrine Ackroyd     | Christchurch     |       | 8014        | New Zealand |
| Paula Rowell         | Christchurch     |       |             | New Zealand |
| Olivia Shakespeare   |                  |       |             | New Zealand |
| Matt Vaughan         |                  |       |             | New Zealand |
| Lucy Vaughan         |                  |       |             | New Zealand |
| Marissa Gaffney      | Christchurch     |       |             | New Zealand |
| Shishi Huang         | Christchurch     |       |             | New Zealand |
| Harry Vaughan        |                  |       |             | New Zealand |
| Mary Pat Heveldt     | Christchurch     |       |             | New Zealand |
| Trudy Longson        | Chch             |       | 8042        | New Zealand |
| Julie Auld           |                  |       |             | New Zealand |
| Deborah Vaughan      | Christchurch     |       |             | New Zealand |
| Jo Spillane          | Christchurch     |       |             | New Zealand |
| Dorothy Smart        | Christchurch     |       | 2548        | New Zealand |
| Susan Arps           | Chch             |       |             | New Zealand |
| Sara Hill            |                  |       |             | New Zealand |
| Madi Hill            | Queenstown       |       | 9300        | New Zealand |
| Fiona Lynch          | Christchurch     |       | 8014        | New Zealand |
| Hague Nicole         |                  |       |             | New Zealand |
| Kate Woodley         | Christchurch     |       |             | New Zealand |
| Anne Ott             | Auckland         |       | 1050        | New Zealand |
| Kirsty Binnie        |                  |       |             | New Zealand |
| Debbie Fowler        |                  |       |             | New Zealand |
| Stephen Bryant       | Palmerston North |       |             | New Zealand |
| Andrea Phillips      | Christchurch     |       | 8083        | New Zealand |
| Mark Hazeldine       |                  |       |             | New Zealand |
| Lynette Crestani     | Christchurch     |       | 8053        | New Zealand |
| Margaret Flanagan    | Christchurch     |       |             | New Zealand |
| Victoria Wynn Thomas | Auckland         |       | 1023        | New Zealand |
| John Vake            |                  |       |             | New Zealand |
| Jo Spillane          |                  |       |             | New Zealand |
| Carolyn Eyre-Walker  | Christchurch     |       |             | New Zealand |
| Lucy Kerr            | Chch             |       |             | New Zealand |
| Maree Grant          | Christchurch     |       |             | New Zealand |
| Gary Whiteside       |                  |       |             | New Zealand |
| Denis Sunderland     |                  |       |             | New Zealand |
| Maurice Pam Wilson   |                  |       |             | New Zealand |
| Tina Cook            | Christchurch     |       |             | New Zealand |
| Brendan O'Dea        | Christchurch     |       |             | New Zealand |

|                    |                                 |       |             |
|--------------------|---------------------------------|-------|-------------|
| Shahryn Morse      | Auckland                        | 1052  | New Zealand |
| Deanne Field       | Auckland                        |       | New Zealand |
| Shirley Herd       |                                 |       | New Zealand |
| Sara Green         | Christchurch                    |       | New Zealand |
| Anne Rattray       |                                 |       | New Zealand |
| Sue Sunderland     | Honolulu                        | 96813 | New Zealand |
| Nick Smith         | Suva                            |       | Fiji        |
| Tom Dunlop         |                                 |       | New Zealand |
| Kevin Hasson       |                                 |       | New Zealand |
| Bella Tarawa       | Thames                          |       | New Zealand |
| Francesca Winter   | Christchurch                    |       | New Zealand |
| Andrew Ott         |                                 |       | New Zealand |
| Nicola Bush        |                                 |       | New Zealand |
| Frances Hasson     | Christchurch                    |       | New Zealand |
| Richard Hamilton   | ChCh                            | 8014  | New Zealand |
| Donna Comber       | new zealand                     |       | New Zealand |
| Yong Zheng         |                                 |       | New Zealand |
| Thomas Davidson    |                                 |       | New Zealand |
| Janine W           |                                 |       | New Zealand |
| Caroline Vennell   | Christchurch                    |       | New Zealand |
| Christine McCurdy  | Christchurch                    | 8052  | New Zealand |
| Kim Gemmell        | Christchurch                    |       | New Zealand |
| Hine Moke          | Christchurch                    |       | New Zealand |
| Hilary Lloyd       | Christchurch                    |       | New Zealand |
| Tim Dagg           | Christchurch                    |       | New Zealand |
| Jo Smith           | Christchurch                    |       | New Zealand |
| Lonnae Ferrand     |                                 |       | New Zealand |
| Felicity Wright    |                                 |       | New Zealand |
| Rachel Savory      | Rachel Savory. Christchurch NZ. |       | New Zealand |
| Michal Wells       | Blenheim                        |       | New Zealand |
| Tabitha Rowell     | Auckland                        |       | New Zealand |
| Kelvin Lynn        | Christchurch                    |       | New Zealand |
| Louise Guthrey     |                                 |       | New Zealand |
| Tessa Kain         | Christchurch                    |       | New Zealand |
| Georgie Springford | Christchurch                    |       | New Zealand |
| Helene Hudson      |                                 |       | New Zealand |
| Helen Somers       |                                 |       | New Zealand |
| Jacqueline Hardey  | Auckland                        |       | New Zealand |
| Mary Turnbull      | Christchurch                    | 8041  | New Zealand |
| John Hudson        | Christchurch                    |       | New Zealand |
| Stefan Hadfield    | Hamilton                        | 3216  | New Zealand |
| Chris Graham       | Auckland                        | 1025  | New Zealand |
| Nev Youngman       |                                 |       | New Zealand |
| Rene Astle         | Auckland                        |       | New Zealand |
| Roy Hamer          |                                 |       | New Zealand |
| Pam Glover         | Christchurch                    | 8014  | New Zealand |
| Maree Mason        |                                 |       | New Zealand |
| Geoffrey Gibbs     | Christchurch                    |       | New Zealand |

|                     |              |       |             |
|---------------------|--------------|-------|-------------|
| Chris Sherratt      | Christchurch |       | New Zealand |
| Tanya Spence        |              |       | New Zealand |
| Rhys Cornor         | Dargaville   |       | New Zealand |
| Mandy Hinton        | Christchurch |       | New Zealand |
| ken jenner          | Hamilton     | 3214  | New Zealand |
| naska borlase       | christchurch | 8972  | New Zealand |
| Georgie Wilson      | Wellington   |       | New Zealand |
| Peter Shaw          | Christchurch |       | New Zealand |
| Vanessa De Castro   | Wellington   | 6021  | New Zealand |
| Gretchen Clarke     | Tairua       |       | New Zealand |
| jo Wilkinson        | ChristChurch |       | New Zealand |
| Jay Pert            |              |       | New Zealand |
| Stephanie Nye       |              |       | New Zealand |
| Megan Smith         |              |       | New Zealand |
| J Dobson            | Christchurch | 8053  | New Zealand |
| Sue Mayne           | Christchurch | 8041  | New Zealand |
| Emma King           | Auckland     | 1010  | New Zealand |
| Tia Mclean          |              |       | New Zealand |
| Raumati Pari        |              |       | New Zealand |
| Barbara Price       | Alexandra    |       | New Zealand |
| Libby Coull         |              |       | New Zealand |
| Nikki Carpenter     | Auckland     |       | New Zealand |
| Gaylene Shannon     |              |       | New Zealand |
| Nikki Hannan        | Nelson       | 7045  | New Zealand |
| Kiley Locke         | New Plymouth |       | New Zealand |
| Tim de Castro       | Christchurch | 8011  | New Zealand |
| Alastair Winter     | Auckland     |       | New Zealand |
| Liz Inglis          |              |       | New Zealand |
| Samuel Auld         | Auckland     |       | New Zealand |
| Margaret Pidhirny   | Christchurch |       | New Zealand |
| romola bartholomew  |              |       | New Zealand |
| troy telfer         |              |       | New Zealand |
| Andrew Hay          | Christchurch |       | New Zealand |
| Pip Evans           |              |       | New Zealand |
| Devadatt Paranjape  | Auckland     |       | New Zealand |
| Robert Black        | Christchurch |       | New Zealand |
| Catherine Black     | Christchurch |       | New Zealand |
| William Anderson    |              |       | New Zealand |
| A Bryden Black      | Auckland     |       | New Zealand |
| Laurence Ennor      | Christchurch |       | New Zealand |
| DIANA TAYLOR        | Christchurch |       | New Zealand |
| Wynne de Lautour    | Hastings     | 4120  | New Zealand |
| Florence TREBOUTTE  | Paris        | 75015 | New Zealand |
| Peter Ganly         | Christchurch |       | New Zealand |
| Kathleen Hungerford |              |       | New Zealand |
| Rob Hungerford      | Christchurch |       | New Zealand |
| Caroline Wallace    | Wellington   |       | New Zealand |
| Liz Scott           | Christchurch |       | New Zealand |

|                          |              |      |                |
|--------------------------|--------------|------|----------------|
| Margaret Morris          | Christchurch |      | New Zealand    |
| Victoria Temple-Smith    |              |      | New Zealand    |
| Aleena Augustian         | Auckland     |      | New Zealand    |
| Kathleen Griffin         | Wellington   |      | New Zealand    |
| lois rogers              |              |      | New Zealand    |
| Richard Armitage         |              |      | New Zealand    |
| Megan Feller             | Christchurch |      | New Zealand    |
| Laura-marie Muller       | Auckland     |      | New Zealand    |
| Emma Gilroy              |              |      | New Zealand    |
| Marina Kenton-Smith      |              |      | New Zealand    |
| Patrick Spillane         |              |      | New Zealand    |
| Catherine Mackenzie      | Christchurch | 8014 | New Zealand    |
| Kate Harris              |              |      | New Zealand    |
| James Harris             |              |      | New Zealand    |
| Kirsten Farrelly         | Singapore    | 18   | New Zealand    |
| Eva Meiklejohn           | Dunedin      | 7745 | New Zealand    |
| Mark Winter              |              |      | New Zealand    |
| Marg Aulavemai           |              |      | New Zealand    |
| Phillipa Cunningham      | Auckland     | 600  | New Zealand    |
| Natalie Sisson           | Christchurch | 3976 | New Zealand    |
| J. Burrows               | Christchurch |      | New Zealand    |
| Beverley White           | London       |      | New Zealand    |
| ruth Van der Eb          | Christchurch |      | New Zealand    |
| Anthea Jackson           |              |      | New Zealand    |
| Fraser van Herpt         |              |      | New Zealand    |
| Connor Graham            | Christchurch |      | New Zealand    |
| Christine Marks          | Christchurch |      | New Zealand    |
| Joel Allen               |              |      | New Zealand    |
| Caroline Etherington     |              |      | New Zealand    |
| Simon Sunderland         |              |      | New Zealand    |
| Joanna Wyn-Harris        | Auckland     |      | New Zealand    |
| Vivienne Levy            | Christchurch |      | New Zealand    |
| Gill Walker              | Christchurch |      | New Zealand    |
| Jeremy Wyn-Harris        |              |      | New Zealand    |
| Matt Walker              | Christchurch | 2750 | New Zealand    |
| Keir Wesley              |              |      | New Zealand    |
| Cat Lyne                 | Christchurch |      | New Zealand    |
| Olivia Wesley            |              |      | New Zealand    |
| Valerie Somerville       | Ch Ch        | 8014 | New Zealand    |
| Jane Somerville          | London       |      | England W10 UK |
| Sefton Wesley            | Christchurch |      | New Zealand    |
| Tim Glasson              | Christchurch |      | New Zealand    |
| Murray Walls             | Kaiapoi      |      | New Zealand    |
| Toni Collins             |              |      | New Zealand    |
| Rifka Etherington        | Christchurch |      | New Zealand    |
| Pricilla Roberts         |              |      | New Zealand    |
| Chris Aynsley            | Auckland     |      | New Zealand    |
| angelique van der Velden | chch         |      | New Zealand    |

|                    |              |       |             |
|--------------------|--------------|-------|-------------|
| Michael Boissard   |              |       | New Zealand |
| Tim Collins        | Christchurch |       | New Zealand |
| John Drayton       | Christchurch |       | New Zealand |
| Rosemary Cookson   | Auckland     |       | New Zealand |
| George Hoskins     |              |       | New Zealand |
| Jan Tutty          | Auckland     |       | New Zealand |
| Ainslee Collins    | Napier       |       | New Zealand |
| Graham Sutherland  |              |       | New Zealand |
| Dave Marks         |              |       | New Zealand |
| Hannah Etherington | Edinburgh    | EH1   | UK          |
| Marc Upton         | Palaiseau    | 91120 | France      |
| Amelia West        |              |       | New Zealand |
| Janya Lobb         |              |       | New Zealand |
| Dominic Clarke     | Rotorua      | 3010  | New Zealand |
| Amelia Simpson     | Christchurch |       | New Zealand |
| Romeo Sokolich     | Auckland     |       | New Zealand |
| Gillian Walker     | Christchurch |       | New Zealand |
| Iain Hunter        |              |       | New Zealand |
| Rob McGregor       | Auckland     |       | New Zealand |
| Wendy Rushworth    |              |       | New Zealand |
| heather Cheetham   | Christchurch |       | New Zealand |
| Bobby Turner       | Auckland     |       | New Zealand |
| Laurel Gray        | christchurch |       | New Zealand |
| Mita Jacobs        | Christchurch |       | New Zealand |
| Saurabh Tiwary     |              |       | New Zealand |
| Jeremy Hawkins     | Auckland     |       | New Zealand |
| Andre Richardson   | Auckland     |       | New Zealand |
| Peter Maddison     | Katikati     |       | New Zealand |
| gerry gao          | Auckland     |       | New Zealand |
| Emma Anderson      |              |       | New Zealand |
| Angus Anderson     | Christchurch |       | New Zealand |
| Tom Anderson       |              |       | New Zealand |
| Deidre Rance       |              |       | New Zealand |











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10/05/23

10/05/23

| Name               | City         | State        | Postal Code | Country     | Date             | Comment   |
|--------------------|--------------|--------------|-------------|-------------|------------------|---|
| Donna Kenton-Smith |              |              | ""          | ""          | New Zealand      | 2023-04-19<br>""The level of proposed housing intensification is not well thought out and isn't appropriate for our area. Our community has been through a lot with earthquakes and covid and we are trying to recover and get back to normality. The intensification plans in our area would mean losing our sunlight, our privacy and our ability to grow our own food. Christchurch has a lot of empty space in the inner city which would be perfect for apartment living. The earthquake ravaged inner city has endless gravel car parks too. When these spaces are all full, one day, maybe then the intensification of the city will need to spread into the suburbs but at the moment this is unnecessary and harmful to our communities. This is a badly planned over reaction to a housing shortage and will result in a piecemeal, haphazard outcome - damaging the lives of members of our community as a result. We may need more housing but please let's slow down, think and help provide it in a way that doesn't hurt people unnecessarily."" |
| Cathrine Ackroyd   |              | Christchurch |             |             | 8014 New Zealand | 2023-04-20<br>""Christchurch needs to protect as much green space as possible for so many different reasons, and cramming 18 or so apartments on a piece of land that previously supported one family home and garden (as has happened at the other end of our street) should not be possible. Intensive development in the suburbs than ring the inner city makes a mockery of Christchurch's reputation as the Garden City.""   |
| Trudy Longson      | Chch         |              | 8042        | New Zealand | 2023-04-20       | ""Merivale is such a desirable suburb with good sized sections. I think we need to keep it that way. People love a bit of privacy and a section with lawn & gardens. Not a concrete jungle.""   |
| Jo Spillane        | Christchurch |              |             | ""          | New Zealand      | 2023-04-20<br>""It is a ridiculous proposition in a small community of small roads and inadequate infrastructure""  |
| Maurice Pam Wilson |              |              | ""          | ""          | New Zealand      | 2023-04-21<br>""We need less housing, more sunlight and trees to encourage birds and birdsong, like we used to enjoy. More green space.""   |
| Tina Cook          | Christchurch |              |             | ""          | New Zealand      | 2023-04-21<br>""I appreciate and like that Merivale Mall is a small mall, many people come from all over Christchurch because it's not a big impersonal mall which Christchurch has plenty of. The streets around the mall are narrow and increasing the traffic load would decrease traffic flow and cause an increase in potential of accidents, damage, congestion and noise. Please keep the special character of the Merivale shopping area.""   |
| Nick Smith         | Suva         |              | ""          | Fiji        |                  |   |

2023-04-22 """"because we live Winchester street and local streets are too congested now""""

Caroline Vennell Christchurch "" New Zealand  
2023-04-22 """"Let's have more sub-standard apartment developments in Christchurch! The City Council's done a great job in designating CBD housing precincts to accommodate a growing population, so profit-gouging property developers should not be encouraged to build more cheaply-built, squashed living per metre - yet very expensive, soulless developments in Merivale, where residents occupying small, stacked apartments are suffering mental health issues as evidenced opposite my address.""""

Geoffrey Gibbs Christchurch "" New Zealand  
2023-04-23 """"Why destroy the character of a special community to satisfy the profiteering of the developers. There has been enough poor quality multi-housing properties squeezed into small spaces already and we don't need more. If "it ain't broke why fix it?"."""

Tim de Castro Christchurch 8011 New Zealand  
2023-04-26 """"Tim de Castro Proposed changes would do nothing for the quality of life in Merivale village of which we are very proud. Tim & Vanessa de Castro"""

Felicity Wright "" "" New Zealand 2023-04-27  
""""The proposed changes would be very negative for Merivale and have been rushed through without enough public consultation"""

Rob Hungerford Christchurch "" New Zealand  
2023-04-27 """"Merivale needs protection not congestion. Significant infill housing has already created negative changes in a number of areas. Loss of privacy, light and vegetation. Road congestion with traffic increase. This is not a NIMBY response, but one of common sense.""""

Mark Winter "" "" New Zealand 2023-04-30  
""""We need to preserve what we have and recognise architectural style and distinction from previous renowned architects . We have significant high density development already and need to preserve and protect wxisting green spaces ."""

Natalie Sisson Christchurch 3976 New Zealand  
2023-04-30 """"It's too much. You can build extra houses without ruining the neighborhood.""""

angelique van der Velden chch "" New Zealand  
2023-05-01 """"The best part of Merivale are the green spaces and how these build community. They are an asset.""""

Michael Boissard "" "" New Zealand  
2023-05-02 """"The proposals will destroy the character of a special area.""""

Denis Sunderland "" "" New Zealand

2023-05-02 """"Chapter 14, Residential' the pending changes will ruin Merivale. Merivale a leafy green suburb but has narrow roads and traffic congestion as a consequence of schools, hospitals, Merivale Mall and village. Footpaths and roads in need of repair from EQ and other damage council is aware and has not the resources and funds to mitigate these issues yet it is thinking of adding more pressure to this very infrastructure. This planned change of up to 10 storey high residential builds will be fantastic for developers but will impact severely on home owners. There is no need for such a plan change in this area. There are plenty of vacant sites in the inner city that could accommodate this style of build. Those who are land-banking in this area should be made to release the land for residential builds ie Ngai Tahu, Ryman, etc.. Christchurch is not suffering from a housing shortage due to population growth like Auckland. We are far removed from this issue. The previous Mayor said Christchurch was a Garden City, well i""""

Isabel Walker "" "" New Zealand 2023-05-07  
 """"I have lived in Merivale for over 40 years. Our streets are narrow but charming with beautiful trees. The area needs to stay this way, the lifestyle is enviable. Intensification will change a great deal, will diminish our options and choices.""""

11 May 2023

Dear Christchurch City Council

I am writing to make a submission about the proposed intensification plans for Merivale.

Our family of 5 has lived in Merivale for 15 years. We live here because we love our community. We love the fact that we have sunshine in (and on) our home. We also love the trees and the gardens around us. These factors make our area enjoyable to live in. All of this is threatened by these latest plans you have released.

Here are our reasons for being strongly against the planned intensification plans for Merivale:

### **Destruction of a Thriving Community**

The Merivale community is still recovering from the Canterbury Earthquakes, the loss of life, the shaken and collapsed devastation of our city, the fights with EQC and insurance companies, our endless repairs and the rebuilds. All around us, repairs have happened in almost every home, practically every family has had to move out and fix their home, and nearly every street has been dug up. This upheaval has gone on and on. Our suburb was hit hard, even though we are fortunate enough to have recovered. We have had chaos for so many years. Our children have been growing up amongst all this, with their schools still being rebuilt around them as they try to learn. Their "normal" is not the "normal" the rest of New Zealand has known.

The procession of disasters continued after the earthquakes. We had the massive fires destroying the Port Hills. Then we had a terrible massacre, only 2 kilometres away (a world-class disaster that all looked upon in horror) whilst our children hid under their desks at school, fearing for their lives. Then finally, Covid 19, where the vaccinated and the unvaccinated turned upon one another, and all communities struggled to retain their bonds during months of lockdowns and two years of reduced contact. Fear has reigned for so many years now.

Do we need to wonder why our city has the high rates of anxiety that it does? Why the Christchurch antidepressant rate is the highest in the country? Our resilient community in Merivale has carried most of us through all of this and now needs to be protected against further angst. Many people have struggled during these years, we have talked and talked, and we have supported one another. We have seen it. Our community has remained strong despite the continuous hits.

And now this, after all that we have been through in the last 11 years, our own council deciding to use our thriving, functioning community as an "experiment" for New Zealand intensification. Going above and beyond the government's already shocking three-storey plan. The government have already decided this will be our fate - three-storey homes, close to our boundaries with little permission required. Three-storey homes aren't right for Christchurch, even if they are right for Wellington and Auckland. However, the council's latest proposal to build even higher, four storeys and up to eight storeys, is just devastating! Does the council have no pity? Our community has been through enough.

### **An Empty City**

Christchurch is unique. We have a still recovering, decimated city centre. Full of gravel car parks where buildings once stood. Full of buildings still in a ruined, unusable state. Taking up precious space where all this much-needed high rise, housing could easily be rebuilt. Year after year, these empty plots sit, and these tumble-down buildings remain. Bringing our city down in the process. We have heard there is 50 hectares of spare land in the city. Why is the council not insisting that this land is used for high density housing? Haven't the owners of this land had enough time to build what they wished to replace? Why does our community in Merivale need to be destroyed so that people can live "near" the city when they could actually live "in" the city?

### **Sunshine**

Christchurch is a particularly cold place in the winter. Only our long sunshine hours and our obsession with having windows on our northern side prevent us from needing heating all day, every day over winter. We all know how vital solar gain is. We need to maximise Christchurch's advantage with the amount of sunshine it has, allow it to enter our homes and keep this heat in. For as long as anyone can remember, recession planes have been strongly protected in Christchurch because it is common knowledge that we need sunshine to keep warm. Historically, people have not been allowed to build and compromise anyone else's right to sunlight. These new four-storey (and above) plans for Merivale will rob anyone living beside these proposed, towering, homes of their sunshine. The warmth, positivity and uplifting nature of a sunny home, the ability of gardens to flourish and the right to grow food will vanish on many Merivale properties. Electricity usage will increase considerably once so many have to live in the shade of taller buildings. We are not a city that should be planning for people to live in the shade. Just ask someone who has lived in a shady spot around Christchurch, parts of Lyttleton, for instance. Does anyone enjoy living in the shade? No, they do not! People who live in these places are cold and look upon houses in the sun with absolute longing. They often

move when they can; shady areas are far less desirable. Is this what we intend for Merivale? What about our gardens and what about the right that we all have to grow our food. How can we, at this latitude, have flourishing vegetable gardens and fruit trees when we are destined to live with towering buildings beside us, taking all our warmth and light.

### **A Piecemeal and Haphazard Process**

Isn't it more sensible to restrict the area where taller buildings can be built? The area proposed, 750m either side of Papanui Road, is huge and it is in an areas with very few empty plots left to build on. We think you should move out concentrically and gradually from the city so that areas close to the city intensify quickly. That is what typically happens in cities and, light industrial areas like Sydenham tend to become residential before suburbs and communities are ripped apart. Gradually, the intensification could move out, and, who knows, it may be that one day we do need to open up the whole of Merivale to provide enough housing. By making this a gradual, needs-based process, at least our poor community wouldn't have had to live in amongst, yet more, building sites whilst this process occurs. The proposal for such a large area to suddenly be consented for taller buildings will result in a haphazard outcome, with tall buildings amongst those still trying to live in one and two-storey buildings. Releasing such a big area at once will negatively impact many more people than need to be affected.

### **In Summary**

We are shocked that Merivale is facing such a significant change in the planning laws. These planned changes, which seem sudden and poorly thought out, will hugely affect our enjoyment of living in this area and our positive community interactions. This seems especially ironic after the council has supported incredibly stringent planning laws for as long as we can remember. These proposed plans are an overreaction, a knee-jerk reaction, to a housing shortage in New Zealand. They don't take into account of the fact that our city still has plenty of space to build housing on.

We differ from the rest of New Zealand because our city was flattened by a major earthquake 12 years ago. This city has been through a lot. We need our sunshine and our gardens, and we have a right to grow our own food - this proposal threatens that. We do have space in our inner city to build apartments, and this is what we should do first. Please don't destroy a well-functioning community that has already been through so much over the last 12 years.



The vast majority of our community is firmly against your proposals for Merivale, but many are so exhausted from the continuous onslaught that they don't even know how to fight this. This proposal is unfair and unkind in the extreme. Please reconsider your plans.

Yours sincerely

Donna Kenton-Smith

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

## Submitter Details

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

**First name:** Logan **Last name:** Clarke

**Preferred method of contact** Email

**Postal address:** 35 Cotterill Street

**Suburb:** Addington

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8024

**Email:** login2clarke@hotmail.com

**Daytime Phone:** 0226984103

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:** 78.1

- 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 existence of a commercial zone.

This should be combined with the residential zone and lower the city to grow and change as time goes on. Both Residential and commercial zones should be joined to allow the owners of the land to do with it what will provide the most value to them. For example, having the option to run small stores next to, or on the bottom floor of, residential buildings. It would be good to let each section be driven by an individual business case which does not require a change in consent.

There is a good amount of land which is changing to mixed use zone, which is good, but I would like to see this spread and be more common across the city.

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

**Points:** 78.2

- 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**

It is great to see so changes being made to make our city more walkable and livable. I look forward to all of the high density housing projects which will happen in the next 20 years as Christchurch begins to build up rather than out as we move away from car ownership.

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

**Points:** 78.3

- 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*

Areas within 500 m of Riccarton Road and Papanui Road.

Lincoln Road close to the city center.

247 Riccarton road

**My submission is that**

I would change all the zoning within 500 m of Riccarton road (from Church Corner) and Papanui Road (to Northlands) to be High density with the long term goal of creating strong living corridors along these roads.

Starting the build up now of these areas will provide the people to use the stop and go public transport system once it has been put in place.

Although there is not a 'town center' to build around, as more people are in the area there will be likely to be more business growth to form a new town center which will ideally also grow out from the stop and go service.

In tangent with this work should be done to make Riccarton road and Papanui road built for people with easy walkable and bikeable access along the roads with the ability for small commercial shops to pop up all along the roads.

As a past university student, It would be good to also encourage more denser housing close to the university, particular between Kirkwood ave and Riccarton road. This will providing more housing for students enabling them to live closer to university in properties which do not require major maintenance or grounds work. While what is built is likely to be initially more expensive, as

time goes on this will provide cheaper housing for students long into the future. I would also transition the sections between the university and Rountree street to high density for the same reasons.

I would also propose the addition of a 'town center' along Lincoln road in Addington. Then allow housing within a 5 minute radius of there to also be high density. This will provide another area of natural growth as many sections in this space have been in the medium density zone for a while so contains town more townhouses. This will then be a more natural step up to high density compared to the some other areas. There is already a small town center area along Lincoln road road and would be a good natural space for growth.

There is also an Industry General zone at 247 Riccarton road for the Toyota Dealership. This does not seem to be a good space to allow something industrial in a town center area. There would also be benefit to putting this to Mixed Use town to provide opportunities for either other businesses or residential activities to take up that space.

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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:** 11/05/2023

**First name:** Tony **Last name:** Dale

**Preferred method of contact** Email

**Postal address:** 7 Bradshaw Terrace

**Suburb:** Riccarton

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8011

**Email:** tonydale9@gmail.com

**Daytime Phone:** 02102618220

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.

Additional requirements for hearing:

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 79.1

- 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 refer to the attached document PC14submission2305012.pdf

**My submission is that**

Please refer to the attached document PC14submission2305012.pdf

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Attached Documents

| File                  |
|-----------------------|
| PC14submission2305012 |

BEFORE THE CHRISTCHURCH DISTRICT  
PLAN INDEPENDENT HEARINGS PANEL

IN THE MATTER of  
Proposed Plan Change 14  
Housing and Business Choice

SUBMISSION from Tony Dale

2 MAY 2023

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## INTRODUCTION

Riccarton, where I live, is threatened by the negative social impacts of overblown and unnecessarily premature residential intensification; in particular the high density 6-storey intensification proposed by PC14 for most of the area east of Riccarton Bush.

The social impacts of city-wide intensification are significant, and yet PC14 appears to lack any proper or comprehensive social impact assessment, as required by the RMA.

For reference, s32 of the RMA requires an assessment be completed that identifies the benefits and costs of the environmental, economic, social, and cultural effects of the proposal **and** with a level of detail that corresponds to the scale and significance of the proposal.

## ON SUNLIGHT PRESERVATION

I support changes to building heights, recession planes and set-backs to preserve access to sunlight in medium density zones. However, the Qualifying Matter should be more conservative to preserve sunlight to the same degree as is enjoyed under our current density rules.

The new rules should NOT decrease residents' access to sunlight. The new rules were not formulated taking into account the latitude, climate, temperature or the number of sunshine hours in Christchurch. They are therefore unfair and inequitable.

Notwithstanding the fact the Sunlight QM proposes a more conservative approach, to treat Christchurch the same as Auckland, the shading (and therefore cooling) impacts are different in Christchurch, and rules around setbacks and recession planes should be designed for the Christchurch context.

## ON MODIFYING THE RICCARTON BUSH INTERFACE AREA (RBIA)

The city council proposes the establishment of a QM zone to physically protect Riccarton Bush and Grounds but also to preserve views of the bush.

Supporting that, a Pūtaringamotu Riccarton Bush Heritage Landscape Review, commissioned by the city council, provides evidence that aspects of the bush, when viewed from outside the bush area would be significantly impacted if tall buildings were built around the bush, and these views should be protected.

It recommended limiting heights to 2-storeys in some proposed RMDS enabled zones, to preserve those views, but in some of this RBIA area the city council proposes retain the underlying RMDS zoning, which would still mean higher density, and more liberal recession planes and setbacks. Plainly, this is not what was intended and this zoning should not be applied. I support the position of the Riccarton Bush Kilmarnock Residents' Association (RBK) on this issue.

## ON JANE DEANS CLOSE

I support the position of the Riccarton Bush Kilmarnock Residents' Association (RBK) on this issue: Jane Deans Close should retain its current zoning of Residential Suburban Density Transition.

## ON MATAI STREET WEST

I support the position of the Riccarton Bush Kilmarnock Residents' Association (RBK) on this issue.

## ON RE-DESIGNATING THE RICCARTON CENTRE

Because it is adjacent to the Christchurch CBD, Riccarton should not, as is proposed, be designated a large Town Centre. This will worsen the situation that allowed Riccarton to get to its current size in the first place - largely at the expense of the CBD.

Designating Riccarton a Large Town will hinder efforts to resuscitate Christchurch's moribund CBD, as Riccarton will continue to draw residential and business activity away from the central city. The impact of this proposed designation for Riccarton, coupled with the centre destination for Church Corner, will result in an almost continuous corridor of high-rise densification from the CBD all the way out to Curletts Road and Villa Maria College.

It is within the city council's power to reconsider designations and make the Riccarton commercial area smaller in order to encourage activity and growth where it needs to be: in the CBD.

## ON STORMWATER ISSUES

The stormwater infrastructure in Bradshaw terrace is old (80 years old) and dilapidated. Consequently the infrastructure cannot cope with more than moderate rainfall, as these pictures from 10/5/2023 show. PC14 makes no provision to protect against the on-going and growing risk and frequency of surface water flooding.

More intensification in these streets will allow greater site coverage and introduce more impermeable surfaces. It will also increase the population on these sites, generating even more stormwater and exacerbating flooding problems.

I submit that further densification in areas where flooding is frequent and serious (and there is no immediate plan to mitigate) should be prevented by making those areas a qualifying matter.







## ON RE-EVALUATING WALKING DISTANCES & 6-STOREY ZONES

The walking distances to centre boundaries, used to define the extent of high density 6-storey residential zones in Riccarton, should be recalculated based on the time it takes to walk to key amenities in Riccarton. These walking times should be tested, taking into account reasonable pedestrian capability (eg: for older pedestrians), and local conditions such as traffic, controlled intersections and barriers.

As currently proposed, residents living within supposed walkable distances to Riccarton amenities, are faced with walks of up to 20 minutes to those amenities, and another 20 coming back. The problem is that, for a large centre such as Riccarton, the walking catchment becomes impossibly large for anyone wanting access to services on foot.

## ON ESTABLISHING A PŪTARINGAMOTU PLANNED PRECINCT

I support the position of the Riccarton Bush Kilmarnock Residents' Association (RBK) on this issue: The entire area represented by the Riccarton Bush Kilmarnock Residents' Association [see Fig 10] should be designated a Qualifying Matter, with current zonings maintained, as was agreed in the Christchurch Replacement District Plan Review of 2015.

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

## Submitter Details

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

**First name:** Bernard Johnston and **Last name:** Janette Dovey

### Preferred method of contact

### Postal address:

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

### Daytime Phone:

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

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

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

Note to person making submission:

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

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

Additional requirements for hearing:

## Attached Documents

File

Submission on PC14

## Form 5

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

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

**To** Christchurch City Council (“the Council”)

Name of submitter: Bernard Johnston and Janette Dovey

1. This is a submission on Plan Change 14, Proposed Housing and Business Choice (“PC14”).
2. We could not gain an advantage in trade competition through this submission.
3. The submission relates to PC14 in its entirety. Without limiting this, Sunlight Access and Infrastructure matters are of particular relevance to the specific relief sought below.
4. Our submission is:

#### **4.1 SUNLIGHT ACCESS**

- 4.1.1 The Council has identified specific characteristics that make intensification inappropriate in particular areas of Christchurch. One of the characteristics identified is that, due to the difference in latitude between the Upper North Island and Christchurch, the recession planes proposed by the Medium Density Residential Standards (MDRS) would have a more significant impact on sunlight access in Christchurch than in other Tier 1 cities. We note that the Christchurch-specific factors are lower sun angles, colder ambient temperatures and less powerful diffuse radiation (indirect solar energy). We agree with and support these conclusions, and a proposed Sunlight Access Qualifying Matter.
- 4.1.2 However, we consider that the Council has not taken into account the cumulative impact of the lower sun angles, colder temperatures and less powerful diffuse radiation in combination with the topography of the Port Hills. These factors in combination make the Christchurch context different from the Tier 1 cities of the North Island.
- 4.1.3 Whilst we support the Sunlight Access Qualifying Matter, we note that the examples presented to support it are ‘flat-land’ examples, assuming essentially equal access to sunlight from all directions. This is often not the case on the Port Hills, and particularly so at the base of valleys, e.g. Crichton Terrace/Valley Road, Cashmere (Karitane Valley).
- 4.1.4 At the base of the Hills, for example, the hills behind/above valley floor properties can be seen as, essentially, 20-30+ metre high buildings, already significantly impacting on sunlight admission. Many valleys on the Port Hills run generally north-south; therefore, on the western or eastern sides of valleys, there is already a significant reduction in the number of hours of either afternoon or morning sunlight respectively, i.e. these sites are already compromised by the natural topography. This is currently acceptable to the people living in these valleys, as there are compensatory amenity and wind shelter benefits, but it does mean that the midday northern sun takes on increased importance for these properties. Any additional and cumulative loss of sunlight to the north will have amenity and health significance in these lower Hill areas, as compared to the remainder of ‘flat-land’ Christchurch.

- 4.1.5 In summary, the cumulative impact of the lower sun angle, colder temperatures and less powerful diffuse radiation, the Port Hills topography (particularly in the valleys and at the base of the Hills) and potential three storey properties to the north would be significant and unreasonable in the Christchurch context.
- 4.1.6 There may well be sites on the Hills that are oriented in a way that could accommodate higher density/height of buildings without irrevocable loss of sunlight, but these need to be assessed on a case-by-case basis through a resource consent process, taking into account the existing topographical constraints in relation to sunlight for the adjoining properties, and the Christchurch context.
- 4.1.7 It is noted that the tops/ridges of the Hills are the areas where good 'flat-land' access to sunlight might be achieved and this might justify the MDRS rules being applied to these sites, but these have generally been classified as Residential Character Areas and the rules do not apply. A good portion of the Hills is also classified as Low Public Transport Accessibility Areas. Therefore, it would appear that removing the Hills from the MDRS rules of PC14 would not affect the capacity of Christchurch to any significant degree, but the well-being benefits for those who live at the base of/on the side of the Hills would be significant in comparison.
- 4.1.8 In conclusion, it is our view that Residential Hills zoned properties should not be subject to the MDRS rules in PC14.

## **4.2 INFRASTRUCTURE**

- 4.2.1 There are issues in relation to water, stormwater and wastewater on the Hills, to varying degrees in different areas. This is due to the age and capacity of the infrastructure, and damage from the Christchurch earthquakes.
- 4.2.2 We are particularly concerned that a significant increase in density, with associated increase in hardstand and stormwater discharge, will exacerbate the existing flooding problems experienced at the base of the Hills/valleys and adjacent to the Heathcote River. While attenuation on-site will be required, there is a limit to the amount of attenuation that can be achieved on a typical Hills site containing three houses. Attenuation is not absolute and even slow addition to systems at capacity can create significant problems.
- 4.2.3 The Section 32 documentation does not appear to include any assessment of, or technical reporting on, the infrastructure issues on the Port Hills. (If an assessment has been completed, we request that a copy be uploaded to the CCC website.)
5. We seek the following decisions:
- 5.1 Amend PC14 to add a new Qualifying Matter or amend the existing Sunlight Access Qualifying Matter to include the Residential Hills Zone as a Qualifying Matter area, and make all consequential amendments necessary to give effect to this submission.
- 5.1.1 Alternatively, if that relief is not granted, amend PC14 to add a new Qualifying Matter or amend the existing Sunlight Access Qualifying Matter to include the base of the Hills/valleys as Qualifying Matter areas, and make all consequential amendments necessary to give effect to this submission.
- 5.2 Consider the existing infrastructure issues on the Hills and amend PC14 to include a new Infrastructure Qualifying Matter area on the Hills as appropriate, and make all consequential amendments necessary to give effect to this submission.
6. We wish to be heard in support of our submission.

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

Date: 12 May 2023

Address for service of submitter:

Bernard Johnston and Janette Dovey  
c/- PO Box 305  
Christchurch 8140  
Email: [janette.dovey@bellbird.co.nz](mailto:janette.dovey@bellbird.co.nz)

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

## Submitter Details

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

**First name:** Andrew **Last name:** McCarthy

**Preferred method of contact** Email

**Postal address:** 50 Belleview Terrace

**Suburb:** Mount Pleasant

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8081

**Email:** agm74@xtra.co.nz

**Daytime Phone:** 021569411

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

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

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

Additional requirements for hearing:

## Attached Documents

| File  |
|---|
| PC14 - Submission of Andrew McCarthy                                      |
| Appendix 1 - House Prices in Christchurch - submission of Andrew McCarthy |

12 May 2023

Christchurch City Council  
Email engagement@ccc.govt.nz

## SUBMISSION ON THE PROPOSED HOUSING AND BUSINESS CHOICE PLAN CHANGE

### 1. INTRODUCTION

My full name is Andrew Gregory McCarthy.

My qualifications include a Bachelor of Engineering (First Class Honours) (Environmental) and a Master of Business Administration (Distinction) from the University of Canterbury.

With regard to my professional experience, I worked within the engineering and planning divisions at the Christchurch City Council ("Council") for five years with a focus firstly on stormwater design and treatment, and latterly planning stormwater infrastructure for identified growth areas. I then went on to be a successful franchisee for GJ Gardner Homes and oversaw the construction of over 400 homes across Canterbury including through the earthquake rebuild period. More recently, I have focused on property development and I own some prime development land located on Mt Pleasant. Sensible development of this land is stymied by the Proposed Housing and Business Choice Plan Change ("PC14"), in particular the Low Public Transport Access Qualifying Matter ("LPTAQM").

My qualifications and professional experience make me well placed to comment on PC14 from environmental, urban planning, infrastructure cost, home building, affordability, and business perspectives.

I note that wherever italicisation is used, this is for emphasis, rather than having appeared in the original text.

### 2. ABBREVIATIONS USED

LPTAQM – Low Public Transport Accessibility Qualifying Matter

MDRS – Medium Density Residential Standards

MDRZ - Medium Density Residential Zone

NPS UD – National Policy Statement on Urban Development 2020 (May 2022)

PC14 – Plan Change 14

QM – Qualifying Matter

RHP – Residential Hills Precinct



RMAA – Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021

SDC – Selwyn District Council

WDC – Waimakariri District Council

### 3. PURPOSE OF SUBMISSION

This letter is a submission on PC14 prepared by myself.

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

I wish to be heard in support of this submission and may agree to consider presenting a joint case with other submitters who make a similar submission.

### 4. SUBMISSION

This submission has been prepared following Council’s notification of PC14 in response to the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (“RMAA”) and Medium Density Residential Standards (“MDRS”) contained within that Act.

This submission voices opposition to specific provisions within PC14.

I oppose the retention of the Residential Hills Zone and request that the MDRZ RHP be applied to the entire Residential Hills Zone.

I oppose the Low Public Transport Accessibility Qualifying Matter (“LPTAQM”) identified within Chapter 6.1A and the Planning Maps and incorporated into Sub-chapter 14.3 for various reasons. My main reason for opposing the LPTAQM is that it does not give effect to the intent of the RMAA and NPS UD, especially over most of the hill suburbs. In addition to the removal (or modification) of the LPTAQM, I have proposed a number of amendments to the hill suburbs zoning rules to allow effective, sensible intensification. Many of the reasons overlap to some degree or other. In broad terms, I oppose the LPTAQM and related provisions because:

- a. The LPTAQM is contrary to RMAA
- b. The LPTAQM is contrary to the National Policy Statement on Urban Development 2020 (“NPS-UD”).
- c. The Council has not followed due process in establishing the LPTAQM
- d. A failure to establish the necessity of the LPTAQM
- e. A failure to establish the validity of the LPTAQM
- f. The combination of the LPTAQM and other QMs removes the option of apartment living<sup>1</sup> for almost all of the Residential Hills Zone
- g. The rules as proposed for the MDRZ (Residential Hills Precinct) are too restrictive to allow sensible intensification to proceed

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<sup>1</sup> By ‘apartment living’, I mean that now allowed as MDRS in Schedule 1 of the RMAA, i.e. adjoined housing of 3 buildings per site up to 3 storeys and up to 12 metres high.

## 4.1 CONTRARY TO THE RMAA

Section 77G of the RMAA states as follows:

77G *Duty of specified territorial authorities to incorporate MDRS and give effect to policy 3 or 5 in residential zones*

1. *Every relevant residential zone of a specified territorial authority must have the MDRS incorporated into that zone.*

In establishing the LPTAQM, Council has effectively excluded over a third of the residential sites in the city from densification (22585 out of 66355 sites). This is an utterly enormous chunk of the city to be excluded and goes against the intention of the Act that *every zone would have the MDRS incorporated*. On the hill area of the city, the effects of the LPTAQM are even more marked, with 78% (!) of the lots excluded from densification by the LPTAQM (s6.32.6, s32 Report, Qualifying Matters – Part 3). Never in their minds did the writers of the RMAA imagine that a single qualifying matter would preclude developing a third of the city. Establishing the LPTAQM is thus contrary to the intention of the Act and it should be scrapped.

## 4.2 CONTRARY TO THE NPS UD

Objective 1 of the NPS UD has been misinterpreted by Council.

CCC's s32 report seeks to use Objective 1 of the NPS UD to support the need for the LPTAA QM. At clause 6.32.35 on page 424 it makes the bold statement that:

The principle that in well-functioning urban environments, intensification (in particular higher density development) is focussed around public transport is *embodied* in the NPS UD, policies relating to this objective:

This is a tremendous stretch on the NPS UD. The NPS UD seeks to allow intensification in *all zones*, and directs that intensification providing for minimum 6 storeys or more must occur where rapid transit public transport is provided. *Nowhere* in the NPS UD does it state that the provision of public transport must, or even should, occur before intensification can happen, yet CCC in that same clause found it appropriate to conclude the following:

Medium density development in poorly accessible areas with no focus around public transport is likely to be incompatible and inappropriate with aspects of well-functioning urban environments that require strategic infrastructure spending and planning that integrates the provision of infrastructure with development.

This is a statement of opinion that is unsupported by the NPS-UD itself or by further evidence supporting its conclusion. It does not meet the evidentiary standards that would normally be found in an RMA s32 report, and as such, cannot be relied upon. This misinterpretation by Council means that its proposal of the LPTAQM is contrary to the NPS UD.

Every Tier 1 NZ Council faces the same issue that a nationally mandated intensification means that previous strategic infrastructure planning may have been rendered obsolete by the mandated

change. The incongruity of prior strategic infrastructure plan with the required zoning changes is not grounds to ignore the law and the NPS UD. Such a reliance is contrary to the NPS UD.

Objective 3 of the NPS UD in its entirety reads as follows:

Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which *one or more* of the following apply:

- a. the area is in or near a centre zone or other area with many employment opportunities
- b. the area is well-serviced by existing or planned public transport
- c. there is *high demand* for housing or for business land in the area, *relative to other areas* within the urban environment.

Note the key phrase “one or more”, i.e. wherever a, b or c exist then the district plan should enable more people to live in that area. Council has misconstrued the meaning of 3(b) to be that where areas are not well serviced by existing or planned public transport, then it need not or must not allow more people (via intensification) to live in that area. Even if this were true, and I don’t think it is, in choosing to zero in on Objective 3(b) Council has deliberately ignored 3(c) which states that district plans must enable more people to live in areas of *high demand*. There is an obvious link between high demand and high prices, so it can reasonably be inferred that areas with high prices are also areas of high demand. The hill suburbs of Christchurch are some of the highest value suburbs in Christchurch. 11 of the 14 top-priced suburbs in Christchurch are hill suburbs, and all of them sit in the top (20%) for median property values when compared to the 80 or so suburbs that make up Christchurch city as a whole (see attached Appendix 1 – House Prices in Christchurch).

#### NPS UD Objective 4

Objective 4 of the NPS-UD requires that Council’s planning decisions allow the city’s urban areas to “...develop and change over time in response to the diverse and changing needs of people, communities, and future generations.”

The LPTAQM does the *opposite* of this in relation to most of the Port Hills suburbs in that it entrenches existing zoning rules rather than allowing any intensification and, in particular, it prevents apartment-style living, either in contiguous two storey blocks of more than two dwellings or any apartments of three storeys at all due to the height restrictions in the zone.

Next, NPS UD POLICY 1(a)(i) reads as follows:

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

- (a) have or enable a variety of homes that:
  - (i) meet the needs, in terms of *type*, *price*, and *location*, of different households;

Thus the very first part of the very first policy in the NPS UD requires that Councils make planning decisions that meet the needs in terms of type, price, and location of different households. Refusing to allow apartments to be built in many suburbs clearly precludes those who would seek this *type* of

living in this *location* at the *price* point that apartments offer, typically below that of stand-alone houses.

In establishing the LPTAQM, Council has failed to give due consideration to *all* the objectives and policies of the NPS UD and as such the LPTAQM is contrary to the NPS UD and should be scrapped.

#### 4.3 THE FAILURE TO FOLLOW DUE PROCESS

s77L of the RMAA concerns the justification of QMs and directs councils as to how to proceed when potential QMs are identified. Essentially it seeks to ensure that QMs are not whimsical and where identified they are subject to robust analysis and justification. In particular, the very last part of s77L obliges Councils that its s32 report:

(c) includes a site-specific analysis that—

...

(iii) evaluates an *appropriate range of options to achieve the greatest heights and densities permitted by the MDRS* (as specified in Schedule 3A) or as provided for by policy 3 while managing the specific characteristics.

6.32.4 of the s32 report states that council has evaluated a mere two options: Option 1, to give effect to the MDRS unaltered; or Option 2, the status quo prior to the RMAA being enacted. Council explicitly goes on to say in 6.32.5 that it has not - but could have - evaluated a range of options but did not do so because “they do not fundamentally address the issue and are not readily distinguishable from the effects captured by considering the above two options.” Apart from the terrible clumsiness of this sentence, it is completely unclear what ‘the issue’ is or what effects are captured (or not). It is completely unclear why performing the legislated requirement to consider an appropriate range of options would have meant various effects of different options couldn’t be properly considered. Bizarrely, Council has made no attempt to show why this is the case.

6.32.44 of the s32 report acknowledges that Council has the obligation to only modify to the extent necessary to manage the specific characteristic but that it did not consider any development beyond that already permitted because “low accessibility to public transport is the fundamental issue”. Again Council has made an unsupported statement. Who says that this is the “fundamental issue”? It did not seem to be the fundamental issue for WDC and SDC when those Councils notified their plan changes and gave effect to the MDRS unaltered to the extent that CCC is proposing to do.

Council’s choice to reach its conclusion prior to analysis, and its choice to *not* evaluate an *appropriate range* of options means that it has failed to follow the prescribed process for establishing the LPTAQM and thus the LPTAQM is fatally flawed and should be scrapped.

#### 4.4 THE FAILURE TO ESTABLISH THE NECESSITY OF THE LPTAQM

The creation of the LPTAQM stems from a clear link in the Council’s mind between intensification and high frequency public transport, i.e., you can’t have intensification unless you have the latter. This linkage is spurious. Other Tier 1 Councils do not seem to have seen fit to create a similar linkage, notably not CCC’s local peers at WDC and SDC.

Perhaps the link has arisen in CCC's mind from Policy 3 of the NPS-UD. Policy 3 of NPS-UD is highly directive, in that it requires Councils to allow building heights of *at least* 6 storeys within walkable catchments of rapid transit stops and the edge of the city centre zone. The intention of the policy here is clear, that is, where high frequency public transport or highly urban locations are present, a highly densified urban form must be permitted, i.e., the 6 storey buildings. But CCC seem to have flipped this directive on its head and decided that unless high frequency public transport is nearby *and* walkable, no intensification should be permitted, even that directed within the Act. This is a very large stretch on the intention of the Act and it is my opinion that this is not what Parliament – notably, across the party benches – intended.

Even if high frequency public transport were a pre-condition of intensification, Council has not made any attempt to demonstrate just why *walkability* (as opposed to all other possible forms of transport) is an essential condition of intensification. The only reasonable justification for the LPTAQM would be that the negative effects of intensification in these areas significantly outweigh the benefits of allowing intensification, but CCC simply hasn't demonstrated that this is the case.

It is also relevant that increasing the frequency of bus services is a relatively simple exercise and would logically follow on from intensification, rather than precede it. It is much easier, for example, to add bus services to meet (or even create) demand, rather than amending a District Plan to reflect that bus service frequency has now increased. Council's decision to propose that intensification succeeds frequency looks rather like the proverbial tail wagging the dog. Such a proposal is completely unnecessary.

#### 4.5 THE FAILURE TO ESTABLISH THE VALIDITY OF THE LPTAQM

Council has chosen 800m as a walkability standard. On first glance, this seems reasonable, as it is quoted in the literature as the average distance an average person will walk when walking for an average amount of time. This strikes me, however, as an excessive dependence on averages and fails to take account of faster walkers, those who will walk longer, or those who scoot or bike, or God forbid, those who will drive a car to a bus stop, as I sometimes do. Council even conveniently ignores part of its own expert evidence where it is quoted that "potentially people will walk further than that" (s4.1.5, s32 Appendix 50 – Accessibility) in determining the 800m walkability threshold.

The failure to establish 800m as a sensible walkability threshold negates the validity of the LPTAQM in its current form. I submit that 800m is not a valid walkability threshold, and that if the Hearings Panel recommends the LPTAQM be retained in some alternate format, then 1600m would capture a broader range of walkers and transportation modes.

#### 4.6 THE NEGATIVE EFFECTS OF COMBINED QMS – FEW APARTMENTS ON THE HILLS

The combination of the LPTAQM and other QMs removes the option of apartment living for almost all of the Living Hills precinct.

The following hill suburbs are *entirely* excluded from the MDRS by dint of the LPTAQM: Taylor's Mistake, Scarborough, all hill sites in Sumner, Clifton Hill, Redcliffs, Moncks Spur, Mt Pleasant, St Andrew's Hill, Lyttleton, Heathcote Valley, Hillsborough and Westmorland. Only a portion of

Huntsbury and Cashmere are included in the MDRS. Within these two suburbs, 237 properties in Cashmere are affected by the Cashmere Character Area QM, and a further 60 or so properties in Hunstbury are affected by the Slope Hazard QM. The combination of these QMs very effectively precludes intensification from occurring on Christchurch's hill suburbs, except in a very limited area, and simply means that we won't see many apartments on the hill if the LPTAQM is enacted as proposed. Christchurch residents who would seek the type of housing an apartment provides – per NPS UD Policy 1(a)(i) – are effectively precluded from doing so if they want to live on the hills in Christchurch. So the LPTAQM, whatever its validity elsewhere, is contrary to the NPS UD in terms of the effects it has on the hill suburbs.

#### 4.7 PROPOSED RULES TOO RESTRICTIVE

Council has failed to appropriately amend the District Plan to give effect to the RMAA on the hill suburbs. This is both true of the Residential Hills Zone, and in the small area in which intensification is allowed, the Medium Density Residential Zone (Residential Hills Precinct). I submit the entire existing Residential Hills Zone (but not the Character Area Overlays and Density Overlays) should be changed to the proposed MDRZ (RHP) and the rules for the proposed MDRZ (RHP) area be amended as described below. The reasons for this aspect of my submission are described below.

Firstly, it is clear that the intention of the Act is to allow more dwellings per hectare than was previously allowed. Council has recognised and given effect to this in the MRDZ by shrinking the minimum allotment size from 450m<sup>2</sup> (the current minimum lot size) to 400m<sup>2</sup> (in the MDRZ) per the addition of this standard in Table 1 of Rule 8.6.1. This is a reduction from the standard minimum area of some 11%. No such reduction, however, has been applied to the MDRZ (Residential Hills Precinct). An identical reduction would reduce the minimum vacant allotment size to 578m<sup>2</sup> on the hills. It is submitted that 575m<sup>2</sup> would be appropriate new standard, even though this minimum is still much larger than the flat land equivalent, without obvious justification. This change is sensible and necessary to give effect to the Act's intent, whether or not the LPTAQM is retained in any form.

Secondly, the proposed rules that require a minimum identified building area of 100m<sup>2</sup>, minimum curtilage area of 200m<sup>2</sup>, and vacant lot dimensions all work to restrict intensification in ways that preclude perfectly sensible intensification and thus fail to achieve the purpose of the Act. For example, if a 3 storey apartment were to be built with a minimum building footprint of 100m<sup>2</sup>, this would typically create a very large 300m<sup>2</sup> apartment. The market for 300m<sup>2</sup> apartments is tiny, and thus the proposed rule is having effects that effectively preclude intensification.

Thirdly, requiring new developments to have 200m<sup>2</sup> curtilage area further restricts development. Even if minimum vacant allotment size is maintained at 650m<sup>2</sup>, a combination of 100m<sup>2</sup> minimum building area and 200m<sup>2</sup> curtilage area effectively means minimum 300m<sup>2</sup> per building. Thus it would not be possible to fit the 3 properties per site specified in the Act (Schedule 3A, Part 1(10)) on the (rather large) minimum site size of 650m<sup>2</sup> as a total of 900m<sup>2</sup> would be required to meet the new rules. The best way to amend this silly rule is to remove it and instead simply have one rule that requires the attachment of consent notices to allotments smaller than the site minimum restricting the subsequent number of buildings that may be built on the resulting site. Such a rule is proposed in Section 5.

Fourthly, requiring minimum site dimensions of 10m means that perfectly good designs cannot happen. There are fine designs of apartments that are as narrow as 4m. It should not be for the Council to determine building dimensions. This is much better left to the market, as is clearly the

intention of the Act. If Parliament had wanted to set minimum building dimensions, it would have done so.

## 5. OUTCOMES SOUGHT

In distinct order of preference, being that the first is my most preferred amendment, I seek that Council amends its planning documents as laid out below. I note that I am, however, amenable to further discussion with Council as to alternatives that would achieve the results I seek. The proposed changes are:

- a. **Amendment 1** Amend the Residential Hills Zone to be Medium Density Residential Zone (Residential Hills Precinct) with rule changes sought; and then
- b. **Option 1** Completely remove all reference to and effects of the LPTAQM; or
- c. **Option 2** Reduce the areas affected by the LPTAQM 'walkable distance' to only those areas outside 1600m of any existing or proposed bus route; or
- d. **Option 3** Reduce the areas affected by the LPTAQM 'walkable distance' in the MDRZ Living Hills Precinct to be only those areas outside 1600m of any existing or proposed bus route; or
- e. **Option 4** Reduce the areas affected by the LPTAQM 'walkable distance' to only those areas outside 1600m of any existing or proposed high frequency bus route according to the definition of high frequency as provided.

Proposed text changes as follows:

### 5.1 AMENDMENT 1

Amend all Residential Hill zones on all Planning Maps to be MDRZ (Residential Hills Precinct).

Subdivision Rule 8.6.1 c. should be amended to be:

**Allotments in the Residential Medium Density Zones, and High Density Residential Zones shall include a plan demonstrating that a permitted residential unit can be located on any new allotment, including in relation to recession planes, unit size, access, outdoor living space, and floor level requirements; or for any vacant allotment created it shall have a consent notice per s221 of the RMA attached restricting future subdivision to 2 units if the allotment is less than 60% of the minimum vacant allotment for that zone or 1 unit if the allotment is less than 30% of the minimum vacant allotment size for that zone.**

#### 8.6.1 Table 1

- b. Residential Hills Precinct, minimum size should be 575m<sup>2</sup> for a vacant allotment  
Identified building area  
B col 3, c, delete (i) (ii)

All planning maps should change all Residential Hills Zones to the MDRZ (Residential Hills Precinct).

## 5.2 OPTION 1

- Remove all references to the LPTAQM from all Chapters as required.
- All the planning maps should be amended to have the LPTAQM overlay removed

## 6.1A Qualifying matters

### Chapter 14 Residential

#### ~~Low Public Transport Accessibility Area~~

~~14.1 Introduction, 14.2 Objectives and Policies, 14.3 How to interpret and apply the rules, 14.4 Rules—Residential Suburban Zone and Residential Suburban Density Transition Zone, 14.7 Rules—Residential Hills Zone, 14.8 Rules—Residential Banks Peninsula Zone, 14.15 Rules—Matters of control and discretion, 14.16 Rules—Appendices—all as they apply to areas that are zoned Residential Suburban or Residential Hills, or in Lyttelton zoned Residential Banks Peninsula.~~

Section 771(j)  
matter

## 14.3 How to interpret and apply the rules

f. There are parts of residential zones where the permitted development, **height** and/or density directed by the **MDRS** or Policy 3 of the NPS-UD may be modified by qualifying matters. These are identified in detail in **Chapter 6.1A** and the Planning Maps, and include the following:

~~xix. Low Public Transport Accessibility Area~~

## 5.3 OPTIONS 2- 4

These Options only require amending the Planning Maps to reflect the Options suggested, apart from Option 4 which also requires the following definition to be added to Chapter 2 Abbreviations and Definitions:

### Chapter 2 Abbreviations and Definitions

**High frequency bus route** means any route that has average scheduled frequency of buses of:

Not more than 20 min between the hours of 7am-9am (morning peak) and 3pm-6pm Mon-Fri (evening peak) except on public holidays; and

Not more than 30 min between 6am and 930pm, excluding the morning and evening peaks, 7 days per week, except on public holidays; and

Not more than 45 min between 6am and 930pm on public holidays.



## 6. SUMMARY

I oppose Council's failure to properly give effect to the RMAA and NPS UD. I seek to have the entire Residential Hills zone changed to be MDRZ (Living Hills Precinct). I oppose the LPTAQM, and seek to have it scrapped or significantly modified to allow much more intensification on the hill suburbs than PC14 currently allows.

Where amendments are proposed, these have been identified in specific provisions above.

I wish to be heard in support of this submission and would agree to consider presenting a joint case with other submitters who make a similar submission.

Andrew McCarthy

# Appendix 1 – House Prices in Christchurch

Submission of Andrew McCarthy

Median House Price by Suburb

Mar-23

Source: CoreLogic, Mapping The Market

[www.corelogic.co.nz](http://www.corelogic.co.nz)

| Rank | Suburb           | \$, 000's | Category |                                       |
|------|------------------|-----------|----------|---------------------------------------|
| 1    | Scarborough      | 1816      | 1        | 1 = > 80% of sites affected by LPTAQM |
| 2    | Kennedys Bush    | 1660      | 1        | 2 = > 50% affected by LPTAQM          |
| 3    | Fendalton        | 1631      | 0        | 3 = other QM affecting >50%           |
| 4    | Merivale         | 1488      | 0        | 4 = 10-50% affected by LPTAQM         |
| 5    | Richmond Hill    | 1371      | 1        | 0 = largely or wholly unaffected      |
| 6    | Clifton          | 1260      | 1        | 99 = no data avail for Mar 23         |
| 7    | Strowan          | 1248      | 0        |                                       |
| 8    | Westmorland      | 1148      | 1        |                                       |
| 9    | Redcliffs        | 1140      | 1        |                                       |
| 10   | Moncks Bay       | 1123      | 1        |                                       |
| 11   | Cashmere         | 1118      | 2        |                                       |
| 12   | Sumner           | 1114      | 1        |                                       |
| 13   | Mt Pleasant      | 1108      | 1        |                                       |
| 14   | Huntsbury        | 1103      | 2        |                                       |
| 15   | Tai Tapu         | 1001      | 1        |                                       |
| 16   | Northwood        | 979       | 2        |                                       |
| 17   | Marshland        | 974       | 3        |                                       |
| 18   | Governors Bay    | 970       | 1        |                                       |
| 19   | Harewood         | 951       | 3        |                                       |
| 20   | Cracroft         | 944       | 4        |                                       |
| 21   | Charteris Bay    | 937       | 1        |                                       |
| 22   | Waimairi Beach   | 937       | 1        |                                       |
| 23   | St Albans        | 891       | 4        |                                       |
| 24   | Beckenham        | 885       | 3        |                                       |
| 25   | Ilam             | 885       | 3        |                                       |
| 26   | Burnside         | 868       | 0        |                                       |
| 27   | Wigram           | 853       | 0        |                                       |
| 28   | Halswell         | 813       | 0        |                                       |
| 29   | Casebrook        | 811       | 2        |                                       |
| 30   | Hillsborough     | 790       | 1        |                                       |
| 31   | Yaldhurst        | 772       | 0        |                                       |
| 32   | Heathcote Valley | 771       | 1        |                                       |
| 33   | Opawa            | 771       | 4        |                                       |
| 34   | Avonhead         | 769       | 3        |                                       |
| 35   | Bryndwr          | 769       | 0        |                                       |
| 36   | Lyttelton        | 752       | 1        |                                       |
| 37   | Diamond Harbour  | 751       | 0        |                                       |
| 38   | St Martins       | 742       | 4        |                                       |
| 39   | Papanui          | 735       | 0        |                                       |

|                         |     |    |
|-------------------------|-----|----|
| 40 Riccarton            | 735 | 0  |
| 41 Parklands            | 730 | 1  |
| 42 Somerfield           | 725 | 0  |
| 43 Spencerville         | 724 | 3  |
| 44 Middleton            | 709 | 0  |
| 45 Southshore           | 703 | 1  |
| 46 Broomfield           | 690 | 0  |
| 47 Russley              | 678 | 0  |
| 48 Bishopdale           | 668 | 4  |
| 49 Burwood              | 664 | 1  |
| 50 Upper Riccarton      | 662 | 0  |
| 51 Hillmorton           | 660 | 0  |
| 52 Redwood              | 659 | 0  |
| 53 Templeton            | 658 | 1  |
| 54 Christchurch Central | 653 | 0  |
| 55 Hoon Hay             | 635 | 1  |
| 56 Mairehau             | 635 | 0  |
| 57 Hornby               | 633 | 0  |
| 58 Belfast              | 630 | 3  |
| 59 Shirley              | 630 | 4  |
| 60 Spreydon             | 604 | 4  |
| 61 Hei Hei              | 597 | 2  |
| 62 South New Brighton   | 593 | 1  |
| 63 Sockburn             | 586 | 4  |
| 64 Dallington           | 577 | 4  |
| 65 North New Brighton   | 571 | 1  |
| 66 Northcote            | 568 | 4  |
| 67 Richmond             | 567 | 3  |
| 68 Islington            | 560 | 0  |
| 69 Sydenham             | 557 | 0  |
| 70 Woolston             | 555 | 4  |
| 71 Edgware              | 553 | 0  |
| 72 Addington            | 551 | 0  |
| 73 Avondale             | 547 | 1  |
| 74 New Brighton         | 540 | 2  |
| 75 Avonside             | 532 | 1  |
| 76 Bromley              | 514 | 1  |
| 77 Waltham              | 503 | 0  |
| 78 Wainoni              | 495 | 4  |
| 79 Aranui               | 478 | 4  |
| 80 Phillipstown         | 438 | 0  |
| 81 Bexley               |     | 99 |
| 82 Hornby South         |     | 99 |
| 83 Aidanfield           |     | 99 |
| 84 Ferrymead            |     | 99 |

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

## Submitter Details

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

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

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

Note to person making submission:

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

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

Yes

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

## Attached Documents

File

SRA Julie Housing Intensification Submission May 12th 2023

## *Housing Intensification*

*Julie Tobbell (12/05/2023)*

I have continued to help advocate for Somerfield Residents Association for the past 13 years and now I advocate for all our communities in CHCH.

Of all issues in Somerfield, & communities in Christchurch & NZ, housing intensification has to be the greatest concern we have encountered yet.

The Plan Change 14 proposed by the Government is likely to change these residential areas for ever, if it is not done respectfully and with careful planning or consideration.

I completed a deputation on behalf of our Somerfield Residents Association (as did 16 other resident associations), to the former Mayor Leanne Dalzell and her Council team in 2022. At least these deputations persuaded for the Council staff to reject the Government's PC 14 plans as proposed. We hope that all communities and cities of NZ will continue to reject this proposal as appropriate or necessary, especially for the city of CHCH.

While we all agree that Christchurch may need diverse housing options, we do not need the extent of high-level of intensification which is being imposed upon us and all the cities of NZ. One plan should not fit all cities – especially following the earthquakes in our city.

Many of us know about the multitude of concerns which 3-6 storey housing may create, such as:

- *Loss of sun; Loss of privacy'*
- *Impacts on birdlife, trees & climate change'*
- *Loss of heritage homes & car parking*

- *Further reduction of school zones*
- *Increase in crime in smaller living spaces*
  - *Potential effects following any future Earthquakes*

**-especially while we know the Alpine Fault is yet to rupture!**

**However, it is the likely Impact on the older streets' infrastructure and thereby creating more flood events which is my biggest concern & the question as to whether the infrastructure of our city may cope with the additional housing intensifications?**

**ie: will the power, sewer systems & toilets in our homes cope or make our homes undesirable /unliveable in the future?**

**Personally, I am already surrounded by at least 5x 2 storey housing properties, which now have quadrupled the estimated amount of family members & cars per property. So I fully understand how it is to have it in your backyard' - our toilets nearly already overflow, before the completion of such developments.**

**Ironically Leitch Street is confirmed to be a flood prone street, so with the adjoining Wilderness Drain & with the growth of such developments - our infrastructure may be even more vulnerable in future events. I have requested for streets like this to be a qualifying matter or developments at least restricted further from high density housing unless the drainage & sewer systems may be upgraded.**

**If residents' toilet cisterns can't cope now or in the future, this may make our homes less livable!?! Who will be responsible for paying for new sewer systems or paying for any damage this may create in future weather events.**

**Lack of sun and threat to mental health will most likely be the most significant concerns which may occur with 3 storey or higher level housing.**

I believe that CHCH should not be compared with other cities for a number of reasons. Future high-density housing may either make or break our city long term.

Although further housing may be required - our residents could help by encouraging developers who are prepared to come to our meetings and design more respectful housing, while creating less impact on our environment, ie: Thanks to Brookfield, & Habitus Group!

Thank you for enabling this consultation process and I would love to speak publicly to the CCC Hearing Panel for this.

- Regards, Julie Tobbell.  
Cell 027 272 1063.

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

## Submitter Details

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

**First name:** dot **Last name:** fahey

**Preferred method of contact** Email

**Postal address:** 27B Main South Road

**Suburb:** Sockburn

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8042

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

**Daytime Phone:** 0274660246

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:** 83.1

- 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*

Our submission is in relation to the residential block bounded by Curletts Road, Main South Road, Suva Street and Ballantyne Avenue.

In particular 11-33 Main South Road - requesting that the high density zoning for this part of Main South Rd is pushed back to non Southern Express Major Cycle Route traversing areas. Reasoning as above.

**My submission is that**

Submitter: Sean and Dot Fahey resident homeowners of 27B Main South Road, founding members of the Church Corner Residents Association, and proud Bushies (Bush Inn residents). Our submission is in relation to the residential block bounded by Curletts Road, Main South Road, Suva Street and Ballantyne Avenue.

Curletts Road Main arterial road – 4 lane highway with no barriers between traffic and the footpath. Traversed by the Southern Express Major Cycle Route at the intersection with Main South Rd.

Main South Rd 1-33 -Minor arterial road. 500m stretch of Road with the Southern Express Major Cycle Route on one side and 2 high accident frequency intersections at both ends. As I write this, 5.45pm Saturday April 2023 there is an accident at Main South Rd/Riccarton Road intersection and a second motor vehicle accident at Main South Road and Curletts Road intersection.

Owens Terrace linking Road between Curletts Rd and Ballantyne Avenue.

Suva Street – Southern Express Major Cycle Route + lights at Curletts Road corner to Riccarton HS.

Ballantyne Ave – Shared cycleway/traffic treelined character Avenue that links to Main South Road by a non-motor vehicle alley way. The Suva end of this Street was closed off with the creation of the Southern Express Major Cycle Route to reduce the flow of motor vehicle traffic into Ballantyne Avenue.

1. Proximity to area of historical significance

St Peters Church is a grade 1 historical building. The exact same rating as Mona Vale. Our area should be afforded the same concessions from PC14 that have been afforded to the residents living in the immediate vicinity of Mona Vale based on being in an area of historical significance.

We have few areas of significant character in our area, so those that we do have should be sacrosanct and protected for the use of future generations. Ballantyne Avenue is one of the few areas of significant environmental character. Tree lined cul-de-sac/shared cycleway.

2. Inadequate infrastructure – traversing of Southern Express Major Cycle Route safety risk

Southern Express Major Cycle Route – per the CCC flyer – is an important safe link to 9 schools. Riccarton High, Our Ladies of Victories, Te Kapehu, Villa Maria College, St Thomas and Middleton Grange are all within close proximity of the Main South Rd, Ballantyne Ave, Suva St, Curletts Road block. High volumes of children in the area using the cycleways and footpaths to school.

Curletts Road main arterial road and Main South Road minor arterial road connecting to Riccarton Road, so high volumes of traffic.

Under PC14 there will be higher volumes of children and higher volumes of traffic, but the same old roads, thank goodness for the safe cycleways.....but how safe are the cycle ways when traversed exponentially by new roads planned for high density housing developments. On the surface of it, more housing in an area with lots of schools makes perfect sense, but not amongst high volumes of motor vehicle traffic that traverse the cycleways used by high volumes of school children. The safest solution is to push the high intensification back to non cycleway traversing roads.

How might high density zoning affect out area? It is public knowledge that a high density development is planned for 15-21 Main South Rd, that has been developed in consultation with Council planners. This development proposes connecting Main South Road with Ballantyne Ave with a newly created Road through the spine of the development. Both ends of which traverse the Southern Express Major Cycle Route in an area that is the school route for multiple schools. In one move CCC close off the Suva Street end of Ballantyne Ave to reduce traffic flows and then under PC14 would open a much busier link to a Minor Arterial Road. Road cushions/judder bars could be applied to the spinal road to slow traffic but that doesn't solve the speed or flow of traffic exiting Main South Road across the cycle lane. Traffic lights are not a solution either as they are too close to the Curletts Rd traffic lighted intersection. Please see below picture, green line signifies the cycle lane, the red line signifies the proposed spinal road.

I would invite PC14 decision makers to visit this area at peak traffic, 8.30am on a school day to witness the issues for themselves. Curletts Road with school children and cyclists on the footpath beside 4 lanes of heavy flow traffic is a tragedy waiting to happen. The road itself is very narrow for a four lane highway, there are no barriers between the Street and Road nor room for a dedicated cycle lane that would have buffered distance between the motor vehicle traffic and footpath users. Last month a 9 year old scooter rider was critically injured at the Owens Terrace/Curletts Rd intersection.

Talk to any of the residents from 13-33 Main South Road that traverses the cycleway and we will all attest to the challenges of traversing the cycleway under peak traffic flows and peak cycleway flows. Christmas time is especially difficult. The pressure from traffic to exit the road and the added complication of sometimes fast moving 2 directional cycleway traffic is an onerous task. Ourselves, as daily users of the cycleways as a cyclist, are constantly alert to the dangers of traversing adjoining roads having personally experienced near misses.

### 3. Rezoning Leap.

The needs of the existing home owner/residents are surely equally as important as future home owner/residents. We purchased property in a RS zoned area with reasonable expectation that medium density would be the greatest density that we would face short term. An interim transition to medium density to many would be acceptable over time and give homeowners time to adapt to greater density or to sell their properties and relocate. At medium density our properties would be easier to sell with more potential buyers whereas the high density intensive zoning decision has immediately adversely affecting the retail value/ appeal of our now high density zoned properties. The leap in rezoning breaches the fair and reasonable principles.

Current zoning Southern Express Major Cycle Route

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Attached Documents

| File                                      |
|---|
| Submission PC14-Fahey 11-33 Main South Rd |

Submission PC14 – Request for exemption from high density for 11—33 Main South Road, Church Corner on the basis of historic significance (proximity to Grade 1 historic building), inadequate infrastructure (increased traffic traversing Southern Express Major Cycle Lane will cause safety issues) and contravenes the basic principles of being fair and reasonable (rezoning leap from RS to HD).

Submitter: Sean and Dot Fahey resident homeowners of 27B Main South Road, founding members of the Church Corner Residents Association, and proud Bushies (Bush Inn residents). Our submission is in relation to the residential block bounded by Curletts Road, Main South Road, Suva Street and Ballantyne Avenue.



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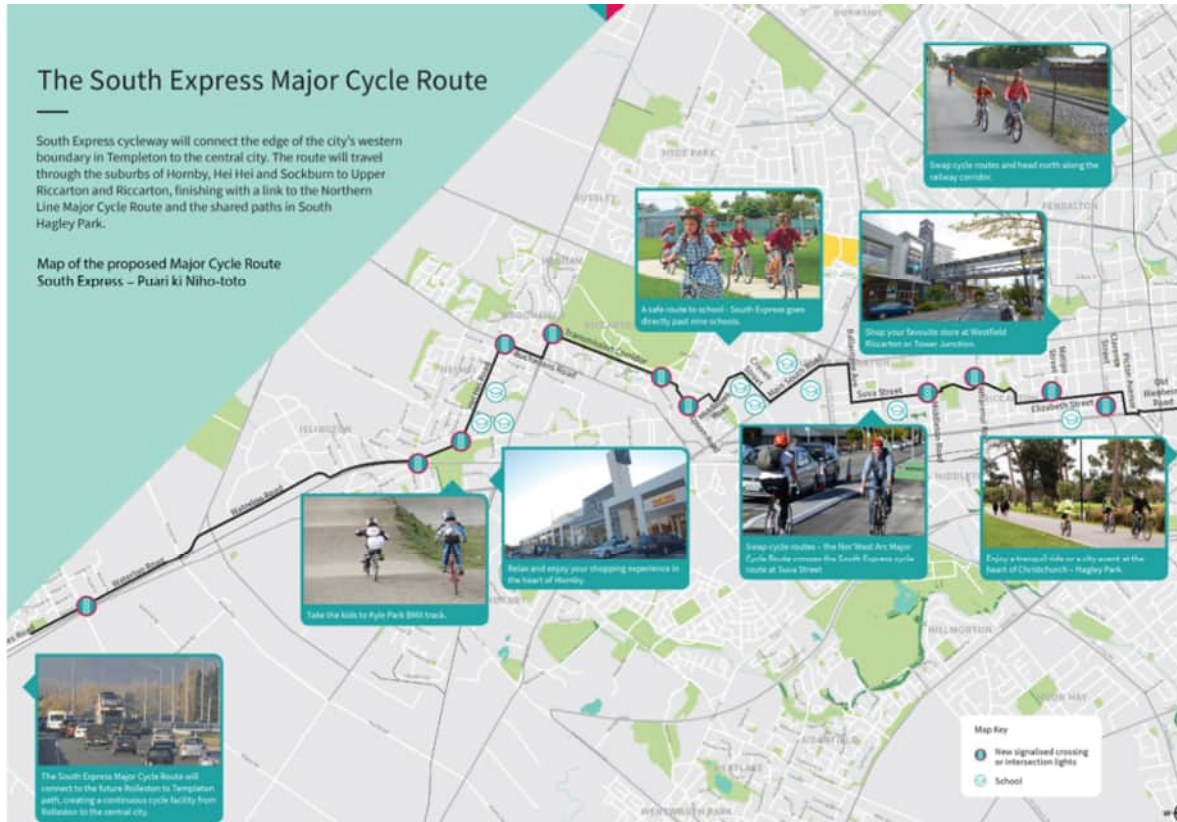
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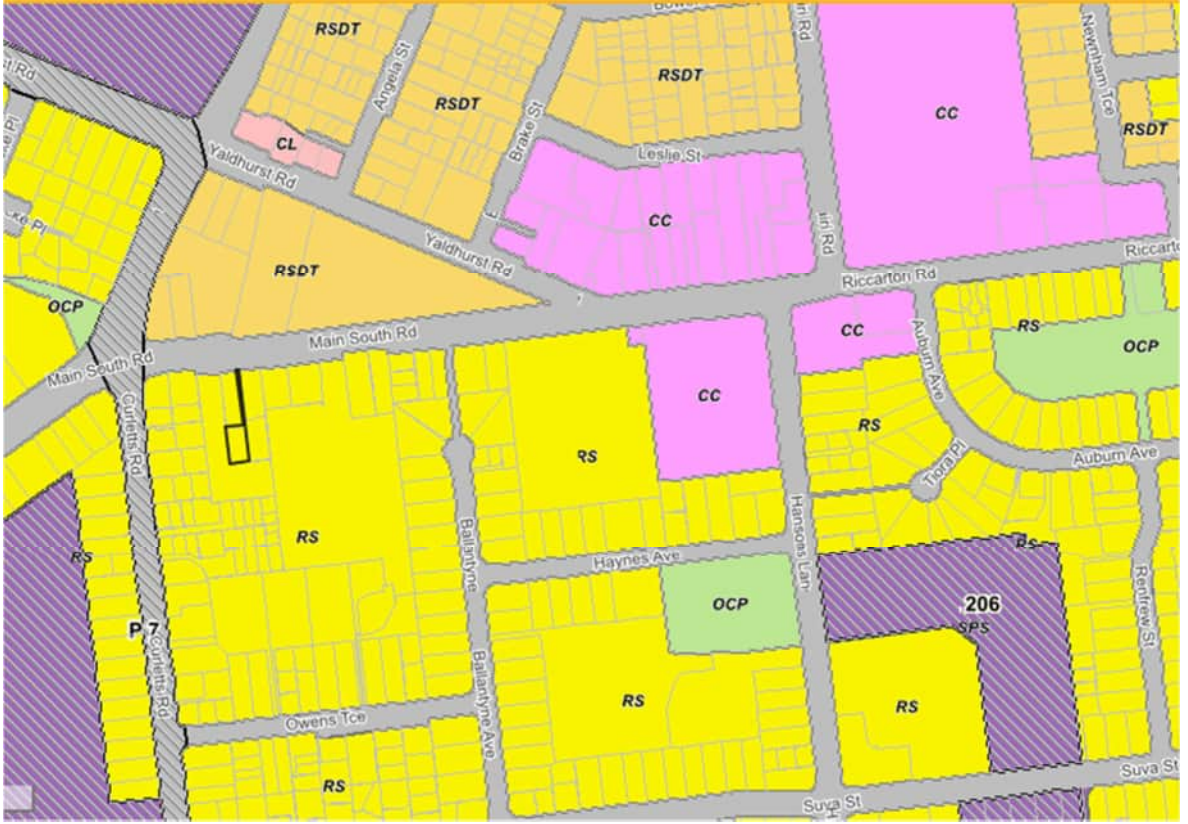
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This submission is supported by Kamal and ILA (Ella) Ghose homeowners of 11 Main South Road Churchcorner and Darcy and Jonny Andrews homeowners of 13 Main South Road

Current zoning



Southern Express Major Cycle Route





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

## Submitter Details

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

**First name:** Wayne **Last name:** Bond

**Preferred method of contact** Email

**Postal address:** 34 Isaac Wilson Road

**Suburb:**

**City:** Kaiapoi

**Country:** New Zealand

**Postcode:** 7630

**Email:** Waynebond@basurveyors.co.nz

**Daytime Phone:** 0272302229

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:

I would like to be notified and asked if I still want to be heard. I would like to see submission for and against first.

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 84.1

- 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 propose that the wording of the definition of “Older person’s housing unit” be amended by the addition of the following words (or words to that effect):

“Where the number of units is ten (10) or less then the group can be held in separate fee-simple titles with the titles encumbered by consent notice and/or a covenant or other appropriate legal instrument which ensures that the use of the unit is confined to older persons. This only applies to groups of units separate from other such units and which are not part of a nested group of neighbouring units.”

**My submission is that**

Older person

means a person over the age of 60 years or a person who qualifies for a permanent supported living payment on health grounds. It includes the partner, spouse, dependants or caregiver of such a person, notwithstanding that the partner, spouse, dependents or caregiver may be under the age of 60 years.

Older person’s housing unit

means one of a group of residential units developed or used for the accommodation of older persons, where the group is held under either one title or unit titles under the Unit Titles Act 2010 with a body corporate, and which is encumbered by a bond or other appropriate legal instrument which ensures that the use of the unit is confined to older persons. It includes any unit previously defined as an elderly person’s housing unit.

In situations where the number of units are ten (10) or less having them tenured as Unit Titles is not always desirable by the occupants. The main reason for the requirement to hold the ownership with Unit Titles is to require specific rules within the Body Corporate Rules controlling the occupancy and ownership of the units to those who fit the definition of an “older person”. This can be controlled by use of a Consent Notice or Covenant registered against a fee simple Title.

**Original Submitter:****Original Point:****Points:** 84.2

- 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***

I desire that the proposed changes be deleted and the exist minimums be retained as the proposed changes will made development more difficult and more expensive. The proposed changes will not achieve anything positive. They go against the policies and objectives of the Plan, the intensions and objectives of the Act and the National Policy Statement. In addition they go against the intention of RMA 1991 which was for District Plans to be enabling and not be prohibitive.

**My submission is that**

Table 7.5.7.1 – Minimum requirements for private ways and vehicle access

The proposed changes within this table increase the minimum legal width of three activity classes and the minimum formed width of two activity classes.

These changes apply to Residential Zones.

Chapter 14 Residential the objectives and polies are stated as follows:

## 14.2 Objectives and Policies (amended as if the plan changes have been passed)

### 14.2.1 Objective Housing supply

a. An increased supply of housing that will:

- i. enable a wide range of housing types, sizes, and densities, in a manner consistent with Objectives 3.3.4(a) and 3.3.8;
- ii. meet the diverse and changing needs of the community and future generations; and
- iii. assist in improving housing affordability.

#### 14.2.1.1 Policy Housing distribution and density

a. Provide for the following distribution of different areas for residential development, in accordance with the residential zones identified and characterised in Table 14.2.1.1a, in a manner that ensures:

- i. new urban residential activities only occur in existing urban areas or in greenfield priority areas identified in Map A of the Canterbury Regional Policy Statement;
- ii. high density residential development is established in the Central City;
- iii. high density residential development in and near identified commercial centres in existing urban areas where there is ready access to a wide range of facilities, services, public transport, parks and open spaces;
- iv. residential density development in greenfield neighbourhoods, that achieves a net density (averaged over the Outline development plan) of at least 15 households per hectare;
- v. greenfield land that is available for further residential development up to 2028;
- vi. low density residential environments in other existing suburban residential areas and in the residential areas of Banks Peninsula, and in small settlements are maintained, but limited opportunities are provided for smaller residential units that are compatible with the low density and township suburban environment; and
- vii. within Banks Peninsula, limited low density residential development adjacent to existing residential townships and small settlements, that complements the surrounding environment, is able to be efficiently serviced by public infrastructure and in some limited circumstances private infrastructure; and is in locations not subject to significant risks to life safety and property damage from natural hazards.

It is important to constrain the residential development of the city so that it does not result in urban sprawl. This has been an objective for many many years and is objective of the National Policy Statement and the Act that has led to PC14.

Having been involved with subdivisions over the last 40 plus years I know that requiring these new increased minimums will make Resource Consents for non-compliances necessary for the vast majority of infill subdivisions. Added to the legal width there is a setback requirement from the existing buildings to the access boundary.

Where possible I have always encouraged my clients to make the legal access to two or three new rear allotments a minimum of 3.5m as I believe it is desirable. Having said that I have seen many 3m wide rear accesses with 1.8m high fences on either side which are more than adequate and have personally backed moving trucks up them.

Increasing these minimums goes against all the objectives of the Residential Zones. These rules make it harder to increased supply of housing and they will make doing so less affordable.

#### 7.2.1.3 Policy – Vehicle access and manoeuvring

a. Provide vehicle access and manoeuvring, including for emergency service vehicles, compatible with the road classification, which ensures safety, and the efficiency of the transport system.

Wider access does improve access for fire trucks (other emergency vehicles such as ambulances can handle the existing access parameters without difficulty). However in the majority of cases the trucks prefer to park on the road and run hoses to the point where they are needed. This is a length of access issue, bearing in mind that the requirements in law are that the site needs to be within 135m of a fire hydrant for a reason.

**Original Submitter:**

**Original Point:**

**Points:** 84.3

- 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***

I support the addition of b.ii and b.iii, as fee simple titles a better form of tenure.

**My submission is that**

8.2.2.32 Policy – Allotments

- a. Ensure that the layouts, sizes and dimensions of allotments created by subdivision are appropriate for the anticipated or existing land uses.
- b. In residential subdivisions, provide for:
  - i. a variety of allotment sizes to cater for different housing types and affordability;
  - ii. the conversion from a cross lease or unit title to fee simple;
  - iii. subdivision of a cross lease or unit title site arising from the updating of a flat plan or unit plan.

**Original Submitter:**

**Original Point:**

**Points:** 84.4

- 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***

I propose that the wording of 14.5.2.4 (c) be amended by replacing “300mm” with “600mm”. Alternately the following could be added: “Where the eaves are between 300mm and 600mm wide fifty percent (50%) of the total eave area will be included in the building coverage calculation. Where eaves and roof overhangs exceed 600mm the 100% of those eaves or roof overhangs will be included in the building coverage calculation.”

**My submission is that**

14.5.2.4 Site coverage

**c. Eaves and roof overhangs up to 300mm in width and guttering up to 200mm in width from the wall of a building shall not be included in the building coverage calculation.**

A standard building has historically had eaves of approximately 600mm in width. This lends to the generally accepted aesthetics of a building. Obviously, a covered deck needs the roof area to be included in the site coverage calculation.

**Original Submitter:**

**Original Point:**

**Points:** 84.5

- 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*

I'm sorry but this standard does not make sense. Also see my submission on 14.5.2.4 Site coverage.

I propose that the wording of 14.5.2.4 (c) be amended by replacing "300mm" with "600mm". Alternately the following could be added: "Where the eaves are between 300mm and 600mm wide fifty percent (50%) of the total eave area will be included in the building coverage calculation. Where eaves and roof overhangs exceed 600mm the 100% of those eaves or roof overhangs will be included in the building coverage calculation."

**My submission is that**

14.5.2.7 Minimum building setbacks from internal boundaries and railway lines

a. The minimum building setback from internal **boundaries** shall be:

- |      |   |   |
|------|---|---|
| iii. | Eaves and roof overhangs and guttering. | Only road boundary: Eaves and roof overhangs to a maximum of 300mm in width measured from the wall of a building and guttering up to 200mm in width |
|------|---|---|

**Original Submitter:**

**Original Point:**

**Points:** 84.6

- 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*

I propose that "i" be removed with one "ii" amended as follows: Location will read "Road boundary"; Fence height standard will read "Access visibility spay area 1.0m. Balance boundary width 1.8m."

**My submission is that**

14.5.2.409 Street scene amenity and safety fences

a. **Any fencing provided shall meet the following standards, being the maximum permitted height:**

| Fence location                       | Fence height standard   |
|--------------------------------------|---|
| i. Road boundary – non-arterial road | 50% road boundary width (excluding accessways): 1.5m<br><br>Remaining road boundary width: 1.0m |
| ii. Road boundary – arterial road    | 50% road boundary width (excluding accessways): 1.8m<br><br>Remaining road boundary width:      |

1.0m

iii. Side, rear, and internal boundary. 2.0m

14.15.14 Residential fencing

- a. Whether taller fencing on the road boundary is necessary to provide acoustic insulation of living spaces or screening for outdoor living space where the road carries high volumes of traffic;
- b. The extent to which the proposed fence will detract from the openness and coherence of the site and street scene;
- c. The use of materials or visual permeability to reduce dominance effects;
- d. The ability to provide passive surveillance of the street; and
- e. Visual amenity, privacy, dominance, and shading effects on occupants of adjoining sites arising from fences that exceed 2.0m in height on side and rear boundaries.

Fences serve two main purposes. They provide a barrier to keep people out and protect the property and the provide privacy. Given the considerations listed in 14.15.14 the rights of the property owner to protect their property and their privacy seem to take second place to “rights” of others. I do not advocate for fences that are over 2.0m in height. I do believe that a property owner should have the right to a fence that is at least 1.8m high street frontage except where the visibility splay requires a lower fence to avoid visual encumbrance.

**Original Submitter:**

**Original Point:**

**Points:** 84.7

- 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***

I propose that “i” be removed with one “ii” amended as follows: Location will read “Road boundary”; Fence height standard will read “Access visibility spay area 1.0m. Balance boundary width 1.8m.”

**My submission is that**

14.6.2.6 14.6.2.5 Fencing and screening

a. Any fencing provided shall meet the following standards, being the maximum permitted height:

| Fence location                       | Fence height standard   |
|--------------------------------------|---|
| i. Road boundary – non-arterial road | 50% road boundary width (excluding accessways): 1.5m<br><br>Remaining road boundary width: 1.0m |
| ii. Road boundary – arterial road    | 50% road boundary width (excluding accessways): 1.8m<br><br>Remaining road boundary width:      |

1.0m

iii. Side, rear, and internal boundary. 2.0m

#### 14.15.14 Residential fencing

- a. Whether taller fencing on the road boundary is necessary to provide acoustic insulation of living spaces or screening for outdoor living space where the road carries high volumes of traffic;
- b. The extent to which the proposed fence will detract from the openness and coherence of the site and street scene;
- c. The use of materials or visual permeability to reduce dominance effects;
- d. The ability to provide passive surveillance of the street; and
- e. Visual amenity, privacy, dominance, and shading effects on occupants of adjoining sites arising from fences that exceed 2.0m in height on side and rear boundaries.

As for my submission on Rule **14.5.2.9**. Fences serve two main purposes. They provide a barrier to keep people out and protect the property and the provide privacy. Given the considerations listed in 14.15.14 the rights of the property owner to protect their property and their privacy seem to take second place to “rights” of others. I do not advocate for fences that are over 2.0m in height. I do believe that a property owner should have the right to a fence that is at least 1.8m high street frontage except where the visibility splay requires a lower fence to avoid visual encumbrance.

---

#### Attached Documents

| File                   |
|------------------------|
| No records to display. |

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

## Submitter Details

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

**First name:** Glenn **Last name:** Murdoch

**Preferred method of contact** Email

**Postal address:** PO Box 8147

**Suburb:** Riccarton

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8440

**Email:** chaircw@adnz.org.nz

**Daytime Phone:** 021993413

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.

Additional requirements for hearing:

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 85.1

- Support
- Oppose
- Seek Amendment



I seek the following decision from the Council

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**My submission is that**

See our submission attached.

---

Attached Documents

| File   |
|--|
| Architectural Designers NZ Inc Canterbury Westland_Submission to the CCC on PC14 |

**Christchurch City Council**

**Plan Change 14**

**Submission of the  
Canterbury / Westland Branch of  
Architectural Designers NZ**

**12 May 2023**


Thank you for the opportunity to submit our thoughts and feedback on Plan Change 14.

ADNZ is a leading professional body for Architectural Designers and Architects in New Zealand. We represent a proud community of design professionals who share a passion for architecture and creating a better-built environment for all New Zealanders. The Canterbury / Westland branch offers leadership, support, comradery, education, advice and advocacy to our 100 plus Professional Members. This submission is on behalf of the Canterbury / Westland branch of ADNZ.

The proposed changes to the District Plan are the most significant change to urban planning we have seen. Our members have discussed the proposed changes at length and offer the following feedback and recommendations.

Our organisation and its members will not gain an advantage in trade competition through this submission.

**We wish to speak in support of our submission.**



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**General****Title Structures**

Currently there are many units being built on good commercial land which, over time, will become dilapidated.

At this stage there is no mechanism for all owners to come together to sell a property as a whole for further development. This will mean it will be very difficult, if not impossible, for the site to be developed at the density and use required by the city in the future.

This will seriously hamper Christchurch's growth in the mid to long-term future.

Moreover, individual ownership of attached dwellings leads to a slow degradation in the maintenance and upkeep, and therefore the quality, of these types of dwellings.

**Recommendation**

1. Implement a requirement to have all residential units which are attached (touching in some way) to be subdivided under Unit Title and not Fee Simple.

This will enforce an entity (the body corporate) to oversee the maintenance of all units as a whole and be a single point of contact for managing the property's future use.

## Chapter 2 - Definitions

### **Building**

Subclause (f) requires further clarification. Is this the area in plan, or the vertical surface area of a retaining wall?

Subclause (o) requires further definition about the definition of the word 'roofed'. Does 'roofed', for example, include a louvre, pergola or shade sail structure over a deck? Does it include bike park spaces? Does it include stormwater attenuation tanks?

**Chapter 5 – Natural Hazards**

Clause 5.1(e)(ix) defines one of the natural hazards that must be accounted for as , “*exacerbation of some of the hazards above through climate change and sea level rise...*”

Buildings contribute 20% of New Zealand’s greenhouse gas emissions<sup>1</sup>.

**Recommendation**

2. That the Christchurch City Council take this opportunity when the District Plan is being rewritten to require buildings to calculate their lifetime carbon footprint and be required to not exceed a sinking lid maximum.

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<sup>1</sup> <https://www.thinkstep-anz.com/resrc/reports/the-carbon-footprint-of-new-zealands-built-environment/>

## Chapter 6 - General Rules and Procedures

### 6.5.4.2.1 - Building Height

The maximum height of buildings community based activities is generally less than that of the surrounding zone.

This will result in buildings that are out of scale in the surrounding neighbourhood.

#### ***Recommendation***

3. Increase the maximum heights in clause 6.5.4.2.1 to match the surrounding zone.

## Chapter 7 – Transport

### **Appendix 7.5.7 – Access design and gradient**

The change in minimum legal driveway width in Table 7.5.7.1 from 3m to 4m, and formed driveway width of from 2.7m to 3m for residential activities will result in less space being available for planted verges to driveways, and more site space being taken up unnecessarily by vehicle accessways.

#### ***Recommendation***

4. Amend Table 7.5.7.1(a) back to 3m for minimum legal width, and 2.7m for minimum formed width.



## Chapter 8 – Earthworks

### 8.9.2.1 – Permitted Activities – Earthworks

The current earthworks rule limit of 20m<sup>3</sup> of volume or 600mm of depth creates unnecessary Resource Consent applications.

The effect of this rule is that almost every project that includes a driveway requires a Resource Consent for earthworks; this is an unnecessary burden and cost.

#### **Recommendation**

5. We recommend increasing the limits to a much higher level, or at least streamlining the process for these simple Resource Consents.

## Chapter 14.5 - Medium Density Residential Zone

### Street Facing Facades

Good urban design results in buildings that are articulated well from a street perspective, providing interest and a diverse cityscape.

The current proposed rules will allow tall, blank street facades.

#### **Recommendations**

6. Add a rule requiring that at least every 6m width of a street facing façade have a minimum 400mm step in the building line.
7. Within each street facing frontage, a minimum area of the facade to protrude must intrude by a at least 200mm.

### Garages

There is no requirement for a minimum size for a garage, should one be provided.

#### **Recommendation**

If a garage is provided, it should be of a size that allows for an 85<sup>th</sup> percentile car to be parked in it.

### Rule 14.5.1.3 – Restricted Discretionary Activities

Currently the Residential Design Principles are only required to be considered when there are more than four units.

#### **Recommendation**

8. The Residential Design Principles should be considered when any breach of the Permitted Activity standards requires a Restricted Discretionary Resource Consent.

### **Rule 14.5.2.3 – Building Height and Maximum Number of Storeys**

Christchurch has a prominent architectural style that is well understood and celebrated across the city. A key component of this architectural style is steep roof pitches.

To ensure the continuity of the dominant Christchurch architectural aesthetic, steeper roof pitches should be encouraged.

This amended rule works to achieve Objective 3.3.8 (a) that aims for, “...a high quality urban environment...”

#### **Recommendation**

9. Add a subclause (b) to read, “*Unless c. applies, buildings must not exceed 12 metres in height above ground level, except that 50% of a building’s roof in elevation, measured vertically from the junction between wall and roof, may exceed this height by 1 metre, where the entire roof slopes 30° or more, as shown on the following diagram:*”

### **Rule 14.5.2.4 (c) - Site Coverage**

Subclause (c) is ambiguous. This can easily be interpreted as allowing a 300mm eave AND a 200mm gutter to be excluded from the site coverage calculation; we believe this is not the intent.

#### **Recommendation**

10. Rewrite subclause (c) to, “*Eaves, roof overhangs and / or guttering up to a total of 300mm (300mm or 500mm?) in width from the outside extent of a building shall not be included in the building coverage calculation.*”

### **Rule 14.5.2.6 - Height in Relation to Boundary**

In many parts of the city the MRZ abuts a Residential Suburban, Residential Suburban Density Transition or Residential Hills zone, both of which have more restrictive Height in Relation to Boundary standards.

#### **Recommendation**

11. To ensure the amenity of Residential Suburban, Residential Suburban Density Transition or Residential Hills sites that abut MRZ zones, the more restrictive recession planes should apply along the shared boundary of the MRZ site.

#### **Rule 14.5.2.6 (b) - Height in Relation to Boundary**

Further to our commentary on Urban Context, this rule is flawed in its wording. It will result in a predominance of hip roof forms on new developments, further eroding the Christchurch Style architectural language.

This can easily be addressed in part with this rule.

#### **Recommendation**

12. Add a subclause to (b) reading, “*the upper 50% of a gable roof, measured vertically*”, with an appropriate illustration to remove ambiguity.

#### **Rule 14.5.2.6 (b) - Height in Relation to Boundary**

Removing the requirement to apply height in relation to boundary rules on the boundary with a road can have perverse outcomes in some instances.

On narrow streets where a building across the street can impact on access to sunlight, this rule should be removed.

#### **Recommendation**

Amend subclause (c)(i) to, “A boundary with a road where the property boundary across the road is further than *<a distance to be determined>*”.

#### **Rule 14.5.2.7 (a)(i) - Minimum Building Setbacks**

When this rule is applied to a garage with a door facing the street, there is potential for some garage doors to impact on the passage of pedestrians on the footpath. Should a garage door be 1.5m off the boundary and a tilting garage door is installed, this door may impede pedestrians.

#### **Recommendation**

13. Add a further subclause to restrict garage doors to those that do not extend past the property boundary.

#### **Rule 14.5.2.7 (a)(iii) - Minimum Building Setbacks**

#### **Recommendation**

14. Subclause (a)(iii) is ambiguous. This can easily be interpreted as allowing a 300mm eave AND a 200mm gutter to be excluded from the setback requirement; we believe this is not the intent.

#### **Recommendation**

15. Rewrite subclause (a)(iii) to, “*Only road boundary: Eaves, roof overhangs and / or guttering to a total maximum of 300mm in width measured from the outside extent of a building.*”

#### **Rule 14.5.2.7 (a)(iv) - Minimum Building Setbacks**

This rule allows a 3m high garage that is 10.1m long to be erected hard against a neighbour's boundary, significantly impacting on a neighbour's amenity.

##### **Recommendation**

16. Rewrite the rule to, *“Only for side and rear boundaries where the building/s shall be no greater than 3 metres in height above ground level, and have a total length that does not exceed 6.2m.”*

#### **Rule 14.5.2.8 (i) - Outlook Space per Unit**

This rule is ambiguous. It is easy to interpret this rule as allowing the 4m depth of the outlook space to extend to the neighbouring property's building.

##### **Recommendation**

17. Add a further subclause to subclause (i) reading, *“be contained within the property boundaries.”*

#### **Rule 14.5.2.8 (i)(i) Outlook Space per Unit**

This rule allows for the outlook space to be impeded by fences within the property, and also excludes windows on the desired exclusion.

##### **Recommendation**

18. Rewrite the subclause to, *“be clear and unobstructed by buildings or fences (excluding any doors or windows opening into an outlook space from the principal living room); and”*

#### **Rule 14.5.2.9 (a) - Street Scene Amenity and Safety - Fences**

This rule is irrelevant when used in Flood Management Areas where the minimum floor level is increased. In some cases, the top of a 2m high fence will be at or below the floor level of a dwelling.

The heading of the rule is also ambiguous; it appears to be a rule about street fencing but the rule is for fencing on all boundaries.

##### **Recommendation**

19. Rewrite the rule to, *“Any fencing provided shall meet the following standards, being the maximum permitted height above the minimum floor level.”* This one would have a large impact on the existing sections which could be surrounded by 2.8m high fencing if new development all around. Would council have some recommendations on some middle ground here.

20. Rewrite the rule heading to, *“Fencing and Screening”*.

#### **14.5.2.10 - Windows to Street**

Despite this rule being amended to be more restrictive, there is still potential for this rule to be restricted further without impacting the desired outcomes of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.

While moving the requirement to only the first 12m of a site probably excludes buildings towards the rear of a site, it still encompasses many potential alteration and addition projects where the 20% glazing rule becomes significantly onerous. Moreover, a 20% glazing rule applied, for example, 11.5m off the boundary does not achieve the desired engagement with the street that the rule is intended to provide.

#### **Recommendations**

21. Amend subclause (c) from 12m to 6m
22. The area is measured on the visible interior faces of walls. This is the area of wall that occupants experience so it is a more realistic measure.
23. The area of measurement is more clearly defined, is it from finished floor level to finished ceiling level, or from ground level?
24. That the area calculation excludes any garage walls. This is the approach taken by, for example, the Selwyn District Council.
25. Amend subclause (e) from 17.5% to 15%.

#### **Rule 14.5.2.16 - Building Reflectivity**

A simple method of reducing overheating in residential dwellings is to apply a lighter roof colour.

Moreover, this rule is nonsensical when it is not also applied to walls.

Allowing some lighter colours will provide a greater diversity of architectural variation in the hill suburbs without creating a nuisance.

#### **Recommendation**

26. Amend subclause (a) from 30% to 45% LRV.

#### **Rule 14.5.2.17 - Location of Outdoor Mechanical Ventilation**

While this rule pushes the location of external units back from the street, they are still visible.

#### **Recommendation**

27. Amend subclause (a) to require outdoor units visible from the street to be screened.

## Chapter 14.6 - High Density Residential Zone

### Street Facing Facades

Good urban design results in buildings that are articulated well from a street perspective, providing interest and a diverse cityscape.

The current proposed rules will allow tall, blank street facades.

#### *Recommendations*

28. Add a rule requiring that at least every 6m width of a street facing façade have a minimum 400mm step in the building line.
29. Within each street facing frontage, a minimum area of the facade to protrude must intrude by a at least 200mm.

### Garages

There is no requirement for a minimum size for a garage, should one be provided.

#### *Recommendation*

If a garage is provided, it should be of a size that allows for an 85<sup>th</sup> percentile car to be parked in it.

### Rule 14.6.1.3 – Restricted Discretionary Activities

Currently the Residential Design Principles are only required to be considered when there are more than four units.

#### *Recommendation*

30. The Residential Design Principles should be considered when any breach of the Permitted Activity standards requires a Restricted Discretionary Resource Consent.

### Rule 14.6.2.1 (a) - Building Height

The wording of this rule will not achieve an intensification greater than that of the MRZ.

A maximum height of 14m is only a single storey high than that of the MRZ. When a building is four storeys high the NZ Building Code requires a lift. Developers will not add the cost of a lift for only a single additional storey, this development is uneconomical.

#### Recommendation

31. Amend subclause (a) to, “Buildings must not exceed the height above ground level in the table below:

|   |            |
|---|------------|
| <i>Bordering the City Centre Zone</i>                             | <i>22m</i> |
| <i>Bordering a Town Centre</i>                                    | <i>16m</i> |
| <i>Neighbouring a Town Centre at Riccarton, Hornby or Papanui</i> | <i>18m</i> |
| <i>Bordering a Local Centre</i>                                   | <i>12m</i> |
| <i>Bordering a Neighbourhood Centre</i>                           | <i>12m</i> |

.”

These heights are indicative and require further research to ensure their suitability.

### Rule 14.6.2.1 (b) - Building Height

The purpose of the HRZ is to further intensify development around commercial centres. The desire is to achieve a gradual intensification as we approach the commercial area.

This rule is worded to permit a ‘ring’ of lesser intensification around a commercial centre.

#### Recommendation

32. Amend subclause (b) to, “Residential units shall not be less than the maximum height permitted in the MRZ.”



### **Rule 14.6.2.2 (c) - Height in Relation to Boundary**

Further to our commentary on Urban Context, this rule is flawed in its wording. It will result in a predominance of hip roof forms on new developments, further eroding the Christchurch Style architectural language.

This can easily be addressed in part with this rule.

#### **Recommendation**

33. Add a subclause to (b) reading, “*the upper 50% of a gable roof, measured vertically*”, with an appropriate illustration to remove ambiguity.

### **Rule 14.6.2.2 (c) - Height in Relation to Boundary**

Removing the requirement to apply height in relation to boundary rules on the boundary with a road can have perverse outcomes in some instances.

On narrow streets where a building across the street can impact on access to sunlight, this rule should be removed.

#### **Recommendation**

Amend subclause (c)(i) to, “A boundary with a road where the property boundary across the road is further than *<a distance to be determined>*”.

### **Rule 14.6.2.3 (a)(i) - Minimum Building Setbacks**

When this rule is applied to a garage with a door facing the street, there is potential for some garage doors to impact on the passage of pedestrians on the footpath. Should a garage door be 1.5m off the boundary and a tilting garage door is installed, this door may impede pedestrians.

Moreover, our understanding is that part of rationality of having a 1.5m minimum building setback from the street boundary is to provide for area for street trees and landscaping to mitigate, at human scale, large building facades.

The reliance of this amenity to occur solely through private land may not lead to the desired outcomes.

#### **Recommendation**

34. Add a further subclause to restrict garage doors to those that do not extend past the property boundary.

35. Develop a mechanism where public property can accommodate tree planting, for example a financial contribution to aid in street planting upgrades in lieu of building setbacks.

### **Rule 14.6.2.3 (b)(iii) - Minimum Building Setbacks**

**Recommendation**

Subclause (b)(iii) is ambiguous. This can easily be interpreted as allowing a 300mm eave AND a 200mm gutter to be excluded from the setback requirement; we believe this is not the intent.

**Recommendation**

36. Rewrite subclause (b)(iii) to, *“Front boundary setbacks: Eaves, roof overhangs and / or guttering to a total maximum of 300mm in width measured from the outside extent of a building.”*

### **Rule 14.6.2.4 (i) - Outlook Space**

This rule is ambiguous. It is easy to interpret this rule as allowing the 4m depth of the outlook space to extend to the neighbouring property’s building.

**Recommendation**

37. Add a further subclause to subclause (i) reading, *“be contained within the property boundaries.”*

### **Rule 14.6.2.4 (i)(i) Outlook Space**

This rule allows for the outlook space to be impeded by fences within the property, and also excludes windows on the desired exclusion.

**Recommendation**

38. Rewrite the subclause to, *“be clear and unobstructed by buildings or fences (excluding any doors or windows opening into an outlook space from the principal living room); and”*

### **Rule 14.6.2.5 - Building Separation**

This clause is ambiguous.

**Recommendation**

39. Amend the clause to read, *“Residential units above 12 metres in height above ground level must be separated from any other residential units **on the same site** by at least 10 metres measured horizontally, except where a common wall is included.”*

### **Rule 14.6.2.6 (a) - Fencing and Screening**

This rule is irrelevant when used in Flood Management Areas where the minimum floor level is increased. In some cases, the top of a 2m high fence will be at or below the floor level of a dwelling.

**Recommendation**

40. Rewrite the rule to, *“Any fencing provided shall meet the following standards, being the maximum permitted height above the minimum floor level.”*

### **Rule 14.6.2.8 - Windows to Street**

Despite this rule being amended to be more restrictive, there is still potential for this rule to be restricted further without impacting the desired outcomes of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.

While moving the requirement to only the first 12m of a site probably excludes buildings towards the rear of a site, it still encompasses many potential alteration and addition projects where the 20% glazing rule becomes significantly onerous. Moreover, a 20% glazing rule applied, for example, 11.5m off the boundary does not achieve the desired engagement with the street that the rule is intended to provide.

#### **Recommendations**

41. Amend subclause (c) from 12m to 6m
42. The area be measured on the visible interior faces of walls. This is the area of wall that occupants experience so is a more realistic measure.
43. The area of measurement be more clearly defined, is it from finished floor level to finished ceiling level, or from ground level?
44. That the area calculation exclude any garage walls.
45. Amend subclause (e) from 17.5% to 15%.

### **Rule 14.6.2.11 (a)(i) - Service, Storage and Waste Management**

The wording of this rule can have perverse outcomes where too much space is required to be allocated to waste storage in some instances.

#### **Recommendation**

46. Amend subclause (a)(i) to, *“Each residential unit shall have sufficient accessible, useable and screened space for the storage and use of three wheelie bins, or provision for shared waste storage facilities.”*

### **Rule 14.6.2.12 (a) - Building Coverage**

The purpose of the HRZ is to further intensify development around commercial centres. The desire is to achieve a gradual intensification as we approach the commercial area.

A site coverage limited to 50% is the same as for the MRZ, further making intensification challenging.

#### **Recommendation**

47. Amend subclause (a) to, *“The maximum building coverage must not exceed 60% of the net site area.”*

### **Rule 14.6.2.12 (a)(i) - Building Coverage**

Subclause (a)(i) is ambiguous. This can easily be interpreted as allowing a 300mm eave AND a 200mm gutter to be excluded from the site coverage calculation; we believe this is not the intent.

**Recommendation**

48. Rewrite subclause (a)(i) to, “Eaves, roof overhangs and / or guttering up to a total of 300mm in width from the outside extent of a building shall not be included in the building coverage calculation.”

**14.6.2.12 (a)(ii)(C) - Building Coverage**

This rule is worded in a way that excludes many sites from this means of development.

Many sites in Christchurch city are 10.6m wide; combining two of these sites does not enjoy the benefits intended by this rule.

**Recommendation**

49. Amend subclause (a)(ii)(C) to, “A minimum development site dimension of 12m is achieved; and.”

**Rule 14.6.2.15 - Location of Outdoor Mechanical Ventilation**

While this rule pushes the location of external units back from the street, they are still visible.

**Recommendation**

50. Amend subclause (a) to require outdoor units visible from the street to be screened.

**Chapter 14.8 - Residential Banks Peninsula****Rule 14.8.3.2.2(a) – Site Density and 14.8.3.2.4(a) – Site Coverage**

These rules appears counter to the desired outcome of intensification, and is also contrary to the existing urban form within Lyttleton.

***Recommendation***

51. Amend subclause 14.8.3.2.2(a) back to 250m<sup>2</sup>, and subclause 14.8.3.2.4(a) back to 60%.

**Chapter 15 – Commercial****Rule 15.2.4.1 – Policy – Scale and Form of Development**

This policy fails to recognise the importance of *Te Papa Otakaro* within the central city.

**Recommendation**

Add a subclause to 15.2.4.1 limiting building height along the *Te Papa Otakaro* corridor, and implement appropriate built form standards.

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

## Submitter Details

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

**First name:** Robyn **Last name:** Thomson

**Preferred method of contact** Email

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**Suburb:** Riccarton

**City:** Christchurch

**Country:** New Zealand

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

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

Note to person making submission:

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

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

Yes

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 86.1

- 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.

Riccarton should be a Local Town Centre not a Large Town Centre.

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Attached Documents

| File                          |
|-------------------------------|
| Robyn Thomson-Submission PC14 |



Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

Gender:  Male  Female  Non-binary/another gender

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

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

## \* Required information

Name\* Robyn Thomson  
Address\* 13 Harakeke St, Riccarton Christchurch Postcode\* 8011  
Email robyn\_t@icloud.com Phone no. 021 1293619

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

Organisation's name —  
Your role —

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

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

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

(a) adversely affects the environment, and

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

Yes  No

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

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

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

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

I do not wish to speak.

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

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

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

Yes, I have attached extra sheets.

No, I have not attached extra sheets.

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

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

Signature [Signature] Date 10.05.23

## 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.)*

1. Riccarton should be a Local Town Centre not a Large Town Centre
2. A Social Impact assessment must be carried out to determine the effects of proposed high density housing in the Riccarton Bush to Deans Avenue area north of Riccarton Road.
3. Sunshine Access Qualifying Matter
4. Tree Cover
5. Pūtaringamotu-Riccarton Precinct— A new Qualifying Matter
6. Other things that are of concern

### **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.)*

*Please see following sheets.*

I seek the following decisions from the Council:\*

1. Riccarton HDRS should remain at MDRS and Riccarton should be designated a Local Town Centre
2. I submit a social impact assessment must be carried out to better understand the effects of intensification here.
3. I submit that an amended recession planes proposal which takes into account our Christchurch climate, cooler temperatures and fewer sunshine hours is needed to preserve sunlight access and achieve an equitable result with other Tier1 cities.
4. I submit that to maintain the amenity of neighbourhoods the tree canopy needs to be retained/planted IN that neighbourhood.  
I submit developers have control over the design and construction of the property and they are best placed to bear the responsibility for preserving green space and tree canopy.
5. I submit the entire area represented by the Riccarton Bush Kilmarnock Residents Association should be designated a Qualifying Matter to preserve the special character and history of this area which includes Riccarton Bush and House, Mona Vale, Britten stables and other sites of historical and cultural importance. And the residential character of the neighbourhood as previously described in section 1

#### 6.1 Other things of Concern

Council has the ability to influence some areas, namely:

- The extent of some changes, such as building heights above the MDRS, or the geographic area of proposed new medium, high and mixed use zones
- To what extent a property or area should be either more, or less enabled for development through Policy 3 of the NPS-UD
- What effects the Council will consider when a resource consent is required – taking the technical evidence into account. Effects include matters such as overshadowing, privacy, dominance, design, safety, and access to services.

In all of the above situations I submit that council planners should influence development towards retaining the light, space, character, privacy and trees of existing neighbourhoods. They should not be seen to be enabling each and every development without regard for the liveability for all residents.

6.2 I submit that a stronger emphasis on flood protection and drainage should inform council's decisions around housing intensification.

10 May 2023

For the Christchurch District Plan Independent Hearings Panel 2023

Submission on the Christchurch City Council proposed Housing and Business Choice Plan Change (PC14)

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

1. Riccarton should be a Local Town Centre not a Large Town Centre
2. A Social Impact assessment must be carried out to determine the effects of proposed high density housing in the Riccarton Bush to Deans Avenue area north of Riccarton Road.
3. Sunshine Access Qualifying Matter
4. Tree Cover
5. Pūtaringamotu-Riccarton Precinct— A new Qualifying Matter
6. Other things that are of concern

### **1. I submit Riccarton should be a Local Town Centre not a Large Town Centre**

I submit our neighbourhood is not suitable for high density intensification and should remain at MDRS and be designated a Local Town centre.

I live to the north of Riccarton Road in an area proposed for HDRS. The residential nature of our neighbourhood is largely single and double-storey detached homes with gardens. There are some attached flats and apartments, but the character of the neighbourhood is suburban residential not urban or town centre. There are increasing numbers of two-storey townhouses and smaller sections, which is meeting the densification needs in this area. The few blocks with 4 or 6 townhouses are not selling quickly, unless to investors for subsequent rental.

To borrow from the Council Section 32 Analysis( 3.9.1, one or two very high buildings would potentially detract from the 'suburbscape', particularly if at some distance apart, where they would fail to visually read as one element, or within the context of the local neighbourhood. If we become a Large Town Centre, this haphazard development of high buildings would be enabled and would destroy the desirable residential character of Riccarton.

Slow property sales and falling value are evidence that the existing mini-apartments and small townhouses are not sought after in this area. According to Christchurch based QV valuer Olivia Brownie, "property types that are in oversupply, such as townhouses and apartments are seeing the biggest house value decline".

Commercial properties appear to be in oversupply also. Along Riccarton Road from Harakeke Street to Straven Road and as far as Kauri St there are numerous sites that have been empty and waiting for new business tenants for months and years.

Again I refer to Section 32 Analysis (1.1.3)

“Notwithstanding future intensification, there is still a strong community expectation for overall improvement in amenity values (as noted throughout this report, by reference to summaries of community feedback). **As building heights and densities increase, without some level of planning and policy direction and management of activities, there is potential for living and business desired outcomes and opportunities to be undermined. This includes failing to achieve the uptake of density enabled as the result of a lack of demand.**”(my emphasis)

And the NPS-UD Objective 2 requires a relevant residential zone to provide for “*housing types and sizes that respond to (i) housing needs and demand; and the (ii) neighbourhood’s planned urban built character*” It does not require HDRS in Riccarton.

Riccarton services our suburb with local shops and amenities. We are close enough to the central city to enjoy the Art Gallery, Museum, Turanga and other benefits of the CBD by walking through Hagley Park.

Our proximity to the central city makes Riccarton a satellite neighbourhood Centre. Riccarton is on the doorstep of the CBD and does not need to compete with or replicate it.

**Riccarton HDRS should remain at MDRS and Riccarton should be designated a Local Town Centre**

**2. I submit a social impact assessment must be carried out to better understand the effects of intensification here.**

If we look at the development on the south side of Riccarton Road, there has been greater intensification and some undesirable outcomes. This is now an area where the majority of homes are not owner occupied and the social deprivation index is high with accompanying significant social issues.

There has been no assessment of the social impact that HDRS would have on our neighbourhood in Riccarton. This is required by Section 32 of the RMA and its absence leaves a large hole in the PC14 decision making process.

### 3. Sunshine Access Qualifying Matter

#### Updated recession planes

**I support** an amended proposal for updated recession planes to improve sunlight access for buildings, to increase sun exposure and to give Christchurch a more equitable outcome with other Tier1 cities.

#### **I do not support the Exemptions for buildings greater than 12m in height:**

*In addition to the above, buildings greater than 12 metres in height that are set back seven metres along east-west boundaries, six metres from northern boundaries, and eight metres from southern boundaries, are exempt from recession planes (subject to zone controls).*

These exemptions could result in a building 6m from our northern boundary and 6 stories high that doesn't have to comply with any recession planes.

Our home would lose all sunshine in winter, light and privacy, and our outlook would be a wall. No-one in our situation would support this. Our neighbourhood is **not** suitable for high density intensification.

**I submit that an amended recession planes proposal which takes into account our Christchurch climate, cooler temperatures and fewer sunshine hours is needed to preserve sunlight access and achieve an equitable result with other Tier1 cities.**

#### **Greater control for Tree Canopy cover**

**I support** the idea of a prescribed minimum green space and tree canopy, but I believe it is not sufficient to achieve anything meaningful for local residents.

I do **not** support the financial contribution being used for planting in another area.

The benefits of outdoor green space and trees around each home are well documented. They all enhance the liveability of residential developments.

I believe that financial contributions are a cop-out. Currently residents see new two-storey, multi-dwelling, attached apartments going up on sites that have been cleared of plantings apart from a couple of fence line trees, for example at 25 Matai Street West Riccarton. (Photographs below)

There will be 13 units on this site and they are closer to the boundaries than permitted without Resource Consent. There will be driveway access and 13 parking sites, leaving very little outdoor space for planting.



I **submit** that to maintain the amenity of neighbourhoods the tree canopy needs to be retained/planted **IN** that neighbourhood.

I **submit** developers have control over the design and construction of the property and they are best placed to bear the responsibility for preserving green space and tree canopy.

### **5. Establishing a planned Pūtaringamotu-Riccarton Precinct— A new Qualifying Matter**

I submit the entire area represented by the Riccarton Bush Kilmarnock Residents Association should be designated a Qualifying Matter to preserve the special character and history of this area which includes Riccarton Bush and House, Mona Vale, Britten stables and other sites of historical and cultural importance. And the residential character of the neighbourhood as previously described in section 1.

**I support this new Qualifying Matter for all the reasons given by RBK Residents Association.**

#### **Other things that are of concern:**

1. Council has the ability to influence some areas, namely:

- The extent of some changes, such as building heights above the MDRS, or the geographic area of proposed new medium, high and mixed use zones
- To what extent a property or area should be either more, or less enabled for development through Policy 3 of the NPS-UD
- What effects the Council will consider when a resource consent is required – taking the technical evidence into account. Effects include matters such as overshadowing, privacy, dominance, design, safety, and access to services.

**In all of the above situations I submit that council planners should influence development towards retaining the light, space, character, privacy and trees of existing neighbourhoods. They should not be seen to be enabling each and every development without regard for the liveability for all residents.**

2. I support a focus on the increased flood risk we face with climate change. Council is aware that Christchurch is a deltaic city with a high water table and at higher risk of flooding than previously thought.

While high rise residential is touted as reducing flooding, because of its smaller footprint, the reality is there will be greater numbers of people crowded together and less opportunity for water drainage in the areas proposed for medium and high density housing. Streets in our area of Riccarton flood after normal rainfall events.

We are likely to have increasing heavy rainfall events, and as I write the North Island is again experiencing rainfall and flooding requiring an emergency response.

**I submit that a stronger emphasis on flood protection and drainage should inform council's decisions around housing intensification.**

If there is truly some ability to preserve the amenity and character of residential living in Christchurch then I submit Council should be working to protect these to the utmost of their ability.

Thank you for the opportunity to have a say on the future for Christchurch housing.

Robyn Thomson  
13 Harakeke Street  
Christchurch 8011

[robyn\\_t@icloud.com](mailto:robyn_t@icloud.com)  
Mob: 0211293619



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

## Submitter Details

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

**First name:** Hamish **Last name:** Ritchie

**Preferred method of contact** Email

**Postal address:** 231 Quaifes Road

**Suburb:** Halswell

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8025

**Email:** ritchie.hamish@gmail.com

**Daytime Phone:** 021742202

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:

The submitter and ES wish to be heard in support of this submission and would agree to consider presenting a joint case with other submitters who make a similar submission.

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 87.1

- 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**

Full submission attached.

The submitter does not support the zoning proposed under PC14 for 75&77 Rattray Street to be High Density Residential.

---

Attached Documents

| File                      |
|---------------------------|
| Hamish Ritchie submission |

11 May 2023

Christchurch City Council  
Engagement Team  
engagement@ccc.govt.nz

Our reference: 419265

Attention: Engagement Team

## **Submission on Proposed Housing and Business Choice Plan Change & Heritage Plan Change**

### **Purpose of Submission**

This letter is a submission on the Housing and Business Choice Plan Change ("PC14") and the Heritage Plan Change ("PC13") proposed by the Christchurch City Council ("Council") prepared by Eliot Sinclair & Partners Limited ("ES") on behalf of Hamish Ritchie ("the Submitter") in relation to 75 & 77 Rattray Street, Christchurch ("site").

The Submitter will not gain an advantage in trade competition through this submission.

The Submitter will not be directly affected by an effect of the subject matter of the submission that:

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

The submitter and ES wish to be heard in support of this submission and would agree to consider presenting a joint case with other submitters who make a similar submission.

### **Submitters details**

Submitter: Hamish Ritchie

Email: [ritchie.hamish@gmail.com](mailto:ritchie.hamish@gmail.com)

Phone: 021 742 202

Postal Address: 231 Quaifes Road, Halswell, Christchurch 8025

Address for service: Holly Luzak: [holly.luzak@eliotsinclair.co.nz](mailto:holly.luzak@eliotsinclair.co.nz)

### **Site location and context**

The site is located at 75 & 77 Rattray Street, Christchurch ("site") (refer to Figure 1). The site is legally described as Lot 20 & 21 DP 9725 and are held within the Record of Titles CB427/229 and CB459/19 with a land area of 941m<sup>2</sup> for Lot 20 and 948m<sup>2</sup> for Lot 2.



**Figure 1. Aerial of submission site outlined in red (Source: Canterbury Maps Viewer)**

## Submission

This submission has been prepared by following the council's notification of PC14 in response to the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 ("RMAA") and its Medium Density Residential Standards ("MDRS"). This submission is also in relation to PC13 which relates to Heritage and Cultural Matters.

The Submitter does not support the zoning proposed under PC14 for 75 & 77 Rattray Street to be High Density Residential ("HRZ"). This is shown in Figure 2. What is sought instead is to remove the HRZ and request the sites be zoned Medium Density Residential ("MDR"). The Submitter does not support the inclusion of the site in the Heritage Interface Overlay ("HIO") which is also shown in Figure 2 as proposed under PC13.



**Figure 2. Zoning proposed under PC14, and the Heritage Interface Overlay proposed under PC13 (Source: CCC ArcGIS Maps)**

## Reason for the submission

75 & 77 Rattray Street have an approved land use consent for the construction of four residential units under RMA/2021/3212 dated 19<sup>th</sup> November 2021. The submitter intends to implement this land use consent over time. If for some reason the consent is not implemented, we note that PC13 & PC14 rules would in affect likely in four years' time when consent lapses. Therefore, the submitter has an interest in the proposed rules and overlays that are being proposed at this time.

From figure 2 above, it is clear that the Council have proposed the HIO only on the Western side of the proposed heritage area in Piko Street. The HIO on Rattray Street seems to have been imposed only on the basis that HDZ has been proposed. It is the submitters understanding that on one hand the HDZ proposed under PC14 allows for larger buildings up to 14m high and higher density, but on the other hand PC13 adds a new development constraint that adds a level of uncertainty to such high-density development. From the s32 report for PC13 we note that the intent of the HIO is as follows:

*"The rule is a design rule rather than imposing an additional layer of built form standards outside of the RHA, such as a setback buffer, so that the applicant has the built form standards for the zone to use as a guide, but is required to develop a contextual design which provides some flexibility in balancing each of the bulk and location attributes, form and materials to respond to the adjoining RHA and limit visual impact on it."*

It is our understanding that a building on the site that is 5m or less i.e. Single storey would not require resource consent in the HIO, however anything larger would apply the design rule and the need for resource consent.

Conversely the proposed MDR zone west of Piko Crescent (e.g. on Euston Street) would presumably allow 3 storey housing as a permitted activity with no interface considerations. Given this the submitter opposes the high-density zoning on Rattray Street under PC14 and the heritage interface overlay proposed under PC13.

| Maps  | Support/Oppose   | Decision Sought |
|---|--|-----------------|
| Planning Map Oppose 30A and any other relevant Planning Maps which identifies the site. | The site is proposed to be located within the HRZ under PC14. The applicant opposes this zoning.                 | Rezone to MDR   |
| Planning Map Oppose 30A and any other relevant Planning Maps which identifies the site. | The site is proposed to be within the Heritage Interface Overlay under PC13. The applicant opposes this overlay. | Remove Overlay  |

**Table 1. Submission**

Yours sincerely

A handwritten signature in black ink, appearing to read 'Holly Luzak', with a stylized, flowing script.

Holly Luzak  
Resource Management Planner  
BSc (Geography)  
holly.luzak@eliotsinclair.co.nz

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

## Submitter Details

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

**First name:** Simon **Last name:** Kingham

**Preferred method of contact** Email

**Postal address:** 92 Fisher Avenue

**Suburb:** Beckenham

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8023

**Email:** kingham.simon@gmail.com

**Daytime Phone:** 022-014-4956

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:** 88.1

- 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 support the provisions having a higher standard for development.

There are currently plans to transform a sizeable part of brownfield land in Sydenham into a high density, high quality, low carbon future mixed-use neighbourhood is currently being considered.

It has the potential to be the first neighbourhood scale regeneration of its kind in New Zealand.

The key aspects that the plan change is seeking to introduce that I support include;

- Improving housing diversity and affordability, in part by specifying this as a policy objective and *requiring* a proportion of apartments, through ‘comprehensive housing development’.
- *Requiring* development to be medium – high density (4-6 storeys)
- *Requiring* an element of housing to be built as accessible units.
- Promoting a perimeter block urban form of development where the buildings front the street encouraging tree growth and communal space at the rear.
- Promoting low carbon future neighbourhoods with active transport as the default mode of choice
- Introduction of car parking maximums (essentially limited to car share and disability)

This type of urban regeneration is essential to developing a low carbon, healthy future city.

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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:** 12/05/2023

**First name:** Jeff **Last name:** Smith

**Preferred method of contact** Email

### Postal address:

**Suburb:** Christchurch Central

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8011

**Email:** regional.planning@ecan.govt.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

CCC PC13 and PC14 submission final

May 2023

Mark Stevenson  
Manager Planning, City Planning  
Christchurch City Council  
PO Box 7302  
Christchurch 8154  
New Zealand

By email: [planchange@ccc.govt.nz](mailto:planchange@ccc.govt.nz)

Dear Mark,

Canterbury Regional Council (CRC) appreciates the opportunity to provide feedback on proposed Plan Changes 13 and 14 to the Christchurch District Plan. We wish to acknowledge the work that Christchurch City Council (CCC) has done in preparing the updated proposed changes and thank you for meeting with us to clarify how the proposed changes will work.

CRC has considered each of the updated proposed plan changes against the provisions of the Canterbury Regional Policy Statement (CRPS), in the context of the National Policy Statement on Urban Development 2020, and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.

Our submission on each of the updated proposed plan changes is set out below.

For any clarification on our submission, please contact our planning team, ([regional.planning@ecan.govt.nz](mailto:regional.planning@ecan.govt.nz)) and they will be happy to assist.

Yours sincerely,



Jeff Smith  
Team leader Strategy and Planning

## **Notice of Submission on Proposed Plan Changes 13 and 14 to the Christchurch District Plan**

Submission made by electronic means

### **1. SUBMITTER DETAILS**

**Name of Submitter:** Canterbury Regional Council (CRC)

**Physical Address:** 200 Tuam Street

**Postal Address:** PO Box 345

**Email Address:** regional.planning@ecan.govt.nz

**Telephone:** 027 343 6568

**My Address for service for receiving documents and communication about this application is:** by email

### **2. SUBMISSION DETAILS**

This is a submission on proposed plan changes 13 and 14 to the Christchurch District Plan.

We submit in support of proposed plan change 13, and in support in part of proposed plan change 14.

Environment Canterbury could not gain an advantage in trade competition through this submission.

**The reasons for our submission are:**

Outlined in the attached submission.

**The decision we would like the Council to make is**

Outlined in the attached submission.

### **3. SUBMISSION AT THE HEARING**

We do wish to be heard in support of our submission.

### **4. SIGNATURE**

Team Leader Planning & Strategy [date]

[name]

## Submission on Proposed Heritage Plan Change (PC13)

CRC supports in principle the introduction of Residential Heritage Areas and considers that these areas will contribute to the protection of the Christchurch's heritage and character.

Overall, we consider that the further listing of heritage buildings, items, settings, and areas, as well as amendments to provisions, will help to protect Christchurch's heritage from inappropriate subdivision, use and development, and is consistent with the objectives and policies in the CRPS.

CRC supports in full the following proposed changes to the Christchurch District Plan as they are consistent with the CRPS and give effect to national direction:

- Abbreviations and Definitions (new and amended)
- Sub-Chapter 9.3 Historic Heritage (amendments)

CRC also supports in full the following proposed changes to the Christchurch District Plan that would affect CRC operations:

- 8.9.3 Exemptions (amendment to a.xii). This amendment is clear and not restrictive.

CRC does not request any changes to the proposed provisions under PC13.

## Submission on Draft Housing and Business Choice Plan Change (PC14)

CRC notes that Plan Change 14 (PC14) has been developed as an Intensification Planning Instrument (IPI) which is required to meet the Christchurch City Council's obligations under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021, while also giving effect to provisions in the Canterbury Regional Policy Statement (CRPS) and the National Policy Statement on Urban Development 2020.

CRC notes that proposed Plan Change 14 to the Christchurch District Plan proposes consolidated development and intensification, including commercial activities, within the Central City, Key Activity Centres, and in neighbourhood centres commensurate with their scale and function, core public transport routes, mixed-use areas, and on suitable brownfield land. This is consistent with the CRPS.

CRC considers that the areas identified for intensification will help to reinforce the role of the Central City, KACs and neighbourhood centres as the focal point for commercial activities and higher density development. Further consolidation and intensification will help to reduce the adverse effects of travel, the cost of new infrastructure, and will also reduce the need for further expansion into peripheral areas including Highly Productive Land. CRC therefore generally supports proposed PC14, while identifying some concerns (and suggested amendments) in the tables below.

CRC supports in full the following proposed provisions in the Christchurch District Plan as they are consistent with the CRPS and give effect to national direction:

- Abbreviations and Definitions (new and amended)
- 3.3.3 Objective – Ngāi Tahu mana whenua (amended)
- 3.3.4 Objective – Housing bottom lines and choice (amended with new advice note)
- 3.3.7 Objective – Well-functioning urban environment (new)
- 3.3.8 Objective – Urban growth, form and design (amended)
- 3.3.10 Objective – Natural and cultural environment (with new clause)
- 5.2.2.5.1 Policy – Managing development in Qualifying Matter Coastal Hazard Management Areas (new)
- 5.2.2.5.2 Policy – Managing development within Qualifying Matter Tsunami Management Area (new)
- 6.12.2.1 Objective – Protection of radiocommunication pathway corridors (new)
- 6.12.2.1.1 Policy – Avoidance of physical obstructions – Cashmere/Victoria Park, Sugarloaf and Mt Pleasant (new)
- 7.2.1.2 Policy – High trip generating activities (with new clause)
- 7.2.1.9 Policy – Pedestrian Access (new)
- 8.2.2.2 Policy – Allotments (amended)
- 8.2.2.3 Policy – Identity (amended)
- 8.2.2.7 Policy – Urban density (amended)
- 8.2.3 Objective – Infrastructure and transport (with new clause d)

- 8.2.3.2 Policy – Availability, provision and design of, and connections to, infrastructure (amended and including new clause g)
- Sub-Chapter 9.3 Historic Heritage (amendments)
- 14.2.1 Objective – Housing supply (amended)
- 14.2.1.1 Policy – Housing distribution and density (amended)
- 14.2.1.2 (deleted)
- 14.2.1.3 (deleted)
- 14.2.1.7 Policy – Monitoring (amended)
- 14.2.3 Objective and Policies 14.2.3.1-14.2.3.5 – MDRS objective and policies (new)
- 14.2.3.6 Framework for building heights in medium and high density areas (new)
- 14.2.3.7 Management of increased building heights (new)
- 14.2.3.8 Policy – Firefighting water capacity (new)
- 14.2.5 Objective – High quality residential environments (amended)
- 14.2.5.1 Policy – Neighbourhood character, amenity and safety (amended)
- 14.2.5.2 Policy – High quality, medium density residential development (amended)
- 14.2.5.3 Policy – Quality large scale developments (new)
- 14.2.5.5 Policy – Assessment of wind effects (new)
- 14.2.5.6 Policy – Character of low density areas (amended)
- 14.2.6 Objective – Medium Density Residential Zone (new)
- 14.2.6.1 Policy – MDRS Policy 1 (new)
- 14.2.6.2 Policy – Local Centre Intensification Precinct (new)
- 14.2.7 Objective and 14.2.7.1- 14.2.7.6 Policies– High Density Residential Zone (new)
- 14.2.8 Objective – Future Urban Zone
- 14.2.8 Objective and Policies 14.2.8.1 and 14.2.8.2 (delete)
- 14.2.12 Objective – Compatibility with Industrial activities (new)
- 14.2.12.1 Policy – Managing effects of industrial activities (new)
- 15.2.2.1 Policy – Role of Centres (amended)
- 15.2.3 Objective – Office parks and mixed use areas outside the central city (amended)
- 15.2.3.2 Policy – Mixed use areas outside the central city (amended)
- 15.2.4 Objective – Urban form, scale and design outcomes (amended)
- 15.2.4.1 Policy – Scale and form of development (amended)
- 15.2.4.2 Policy – Design of new development (amended)
- 15.2.6.3 Policy – Amenity (amended)
- 15.2.6.5 Policy – Pedestrian focus (amended)
- 15.2.7 Objective – Role of Central City Mixed Use Zone (amended)
- 15.2.7.1 Policy – Diversity of activities (amended)
- 15.2.8 Objective – Built form and amenity in the central City mixed Use Zone (amended)
- 15.2.8.1 Policy – Usability and adaptability (amended)
- 15.2.8.2 Policy – Amenity and effects (amended)
- 15.2.8.3 Policy – Residential development (amended)
- 15.2.10.2 Policy – Residential development (amended)
- 16.2.2 Objective – Brownfield redevelopment (amended)

- 16.2.2.2 Policy – Brownfield redevelopment (amended)

CRC requests the following changes to the proposed provisions:

## Chapter 6 General Rules and Procedures

| Provision   | Proposed change     | Qualifying Matter  | Support            | Change requested   | Comments  |
|---|---------------------|--|--------------------|--|---|
| <b>Sub-chapter 6.1A Qualifying Matters</b>        |                     |  |                    |  |   |
| 6.1A.1<br>Application of<br>qualifying<br>matters | New sub-<br>chapter | Heritage areas, items and<br>their settings, residential<br>heritage areas | Support in<br>full | None   | Consistent with the CRPS  |
|   |                     | Flood Hazard<br>Management Areas   | Support in<br>full | None   | Consistent with the CRPS  |
|   |                     | Coastal Hazard<br>Management Areas   | Support in<br>Full | None   | Consistent with the CRPS  |
|   |                     | Tsunami Management<br>Area   | Support in<br>Full | None   | Consistent with the CRPS  |
|   |                     | Slope Instability<br>Management Areas                                      | Support in<br>part | CRC consider that the Christchurch District<br>Plan should take into account Trangmar's<br>erosion classes and exclude "severe" erosion<br>class land from further subdivision and<br>development. | Excluding further subdivision on "severe"<br>erosion class land would avoid additional<br>sediment entering waterways from the land<br>most likely to erode as a result of rainfall<br>events.<br><br>CRC consider that medium or high density<br>development on the Port Hills would result in<br>increased stormwater runoff as there is little<br>attenuation capacity in some catchments. This<br>could lead to more sediment loss into<br>Cashmere Stream and the<br>Heathcote/Ōpāwaho River and lead to gross<br>sedimentation of waterways and the coast as<br>well as stormwater networks and down-slope<br>residents. Most of the Port hills are inside the<br>High Soil Erosion Risk Zone under the |



|  |  |   |                 |   |   |
|--|--|---|-----------------|---|---|
|  |  |   |                 |   | Canterbury Land and Water Regional Plan. If such development occurs on these hills, there will be a need to require on-site attenuation. CRC understands that sedimentation is captured under Christchurch City Council bylaws, building consents, and in resource consent conditions, but notes that this is an opportunity to more holistically and strategically address the issue rather than relying on these other management mechanisms. |
|  |  | Waterbody Setbacks  | Support in Full | None  | Consistent with the CRPS  |
|  |  | Radiocommunication Pathway Protection Corridors   | Support in Full | None  | Consistent with the CRPS  |
|  |  | Waste water constraint areas overlay (vacuum sewers)  | Support in Full | None  | Consistent with the CRPS  |
|  |  | Sites of Ngāi Tahu Significance, including Wāhi tapu, silent files, ngā tūranga tūpuna, ngā wai | Support in Full | None  | Consistent with the CRPS  |
|  |  | Sites of ecological significance  | Support in Full | None  | Consistent with the CRPS  |
|  |  | Outstanding natural features and landscapes   | Support in Full | None  | Consistent with the CRPS  |
|  |  | Low Public Transport Accessibility Area   | Oppose in Part  | <p>The CRC Public Transport team would welcome further discussion on these provisions.</p> <p>CRC request either:</p> <ul style="list-style-type: none"> <li>renaming of the “Low Public Transport Accessibility Overlay” to something</li> </ul> | Some of the areas identified as having low public transport accessibility in proposed PC14 are on core existing routes which already have high levels of public transport frequency. They might not be at the level of the ‘walk-out-and-go’ style that the Huihui Mai/Mass Rapid Transit project is looking at, but they are still   |

|  |  |  |  |  |  |
|--|--|--|--|--|--|
|  |  |  |  | <p>that better reflects the reason development is being restricted, in order to retain public confidence in the provision of public transport into the future. For example, the areas could be identified as “Low Connectivity Areas”.</p> <p>Or</p> <ul style="list-style-type: none"> <li>•that the “Low Public Transport Accessibility Overlay” better reflects areas where there is low access to public transport, by excluding areas (e.g. Sumner) where high frequency public transport is already available or planned.</li> </ul> | <p>high frequencies. The number 3 bus route that services Sumner for instance (Sumner being identified as a Low Transport Accessibility Area under PC14) is currently the highest frequency bus service in the city at a 10 minute all day frequency. There are 6 buses per hour going to Sumner and leaving from Sumner every weekday.</p> <p>Areas identified as having low public transport accessibility under PC14 have been selected based on criteria other than frequency of public transport provision, including the difficulty and cost of providing infrastructure to peripheral areas and the selection of public transport routes that connect employment centres rather than selection based on accessibility.</p> <p>In addition to the issue with existing routes, the overlay also seems to be at odds with planned improvements to public transport. Attachment 1 below shows a map from the Greater Christchurch Partnership’s Huihui Mai consultation that is currently taking place, showing just some of the PT Futures improvement for the city. Identifying areas as having low public transport accessibility when upgrades have already been planned in those areas appears inconsistent with transport planning/</p> <p>The impression given to the public by the identification of these areas as having low public transport accessibility seems counterproductive to the Greater Christchurch Partnership’s efforts to sell PT Futures improvements, particularly when the bus-based PT Futures improvements are modelled to deliver 106% patronage increase while the walk-out-and-go style MRT proposal only adds an additional 17% on top of that.</p> |
|--|--|--|--|--|--|

|  |  |   |                 |  |   |
|--|--|---|-----------------|--|---|
|  |  | Sunlight access   | Support in Full | None   | Consistent with the CRPS  |
|  |  | Residential Industrial Interface  | Support in Full | None   | Consistent with the CRPS  |
|  |  | Safe or efficient operation of nationally significant infrastructure (Electricity Transmission Corridors) | Support in Full | None   | Consistent with the CRPS  |
|  |  | Safe or efficient operation of nationally significant infrastructure (Christchurch Airport)               | Support in Part | CRC requests that the finalised remodelled Airport Noise Contours resulting from the peer review of the independent expert panel be included as a Qualifying Matter for intensification of development once they have been finalised. Until that process has been completed, CRC supports the use of the contours as included in the current CRPS as a Qualifying Matter | <p>CRC supports the inclusion of the Airport Noise Contours proposed as a Qualifying Matter for intensification of development under the Christchurch District Plan. The operative Airport Noise Contours are contained in the CRPS. The CRPS is due for review, with a notification date set for December 2024. Prior to initiating this review, CRC has requested, in accordance with Policy 6.3.11(3) of the CRPS that Christchurch International Airport Limited undertake a remodelling of the Airport Noise Contours. A peer review of the inputs, assumptions and outcomes of the remodelling is being undertaken by an independent expert panel. CRC will make the summary report of the remodelling publicly available as soon as practicable after receiving it.</p> <p>CRC supports the inclusion of the most up to date Airport Noise Contours as a Qualifying Matter subject to the findings of the peer review of the independent expert panel.</p> |
|  |  | Safe or efficient operation of nationally significant infrastructure (NZ Rail Network)                    | Support in Full | None   | Consistent with the CRPS  |

|  |  |  |                 |  |  |
|--|--|--|-----------------|--|--|
|  |  | Residential heritage areas (Medium density residential – Area specific rules)                            | Support in Full | None   | Consistent with the CRPS   |
|  |  | Safe or efficient operation of nationally significant infrastructure (Lyttelton Port Influences Overlay) | Support in Full | None   | Consistent with the CRPS   |
|  |  | City Spine Transport Corridor  | Support in Full | None   | Consistent with the CRPS   |
|  |  | Stormwater infrastructure  |                 | <p>CRC requests that upper Halswell River catchment areas within the Christchurch City Council area are covered by a Qualifying Matter that prevents further intensification because of inadequate stormwater infrastructure and downstream flooding effects.</p> <p>CRC requests that more generally, that the thresholds in the Christchurch City Council onsite stormwater mitigation guidance are re-evaluated to ensure that they are fit for purpose and avoid impacts in storm events that exceed the capacity of the mitigation devices.</p> <p>CRC requests that Stormwater Management Plans are provided for certification urgently.</p> | <p>CRC notes that inadequate stormwater infrastructure has not been included as a Qualifying Matter under PC14. CRC understands that the intention is for stormwater to continue to be managed under the Christchurch City Council bylaw and the building consent process. This approach allows the most up-to date information to be used rather than fixed constraints in the District Plan. This will be especially important as climate change impacts on rainfall patterns and on sea levels.</p> <p>While CRC understands the approach that is being taken, CRC has some concern about the thresholds in the Christchurch City Council onsite stormwater mitigation guidance that the current approach relies on. CRC requests that these thresholds are re-examined to ensure that they are fit for purpose and avoid impacts in storm events that exceed the capacity of the mitigation devices. CRC note that modelling is still being developed, and that Stormwater Management Plans are yet to be certified as required by Christchurch City Council's comprehensive stormwater network discharge consent.</p> |

|  |  |  |  |  |   |
|--|--|--|--|--|---|
|  |  |  |  |  | <p>CRC has particular concerns about intensification in the Halswell River catchment. These concerns are based on increased stormwater volume as a result of housing intensification in the catchment, resulting in increased discharges into the Halswell River. CRC requests that upper catchment areas within the Christchurch City Council area are covered by a Qualifying Matter that prevents further intensification because of inadequate stormwater infrastructure and downstream flooding effects. There is potential for cumulative effects of infilling small lots on flat land where, under the onsite stormwater mitigation guidance, no mitigation is required. These cumulative effects would adversely affect others, especially those in existing Flood Management Areas.</p> <p>CRC is also concerned that intensification on the Port Hills would result in higher quantities of water entering the stormwater system and the Heathcote/Ōpāwaho River. Care will need to be taken to ensure that this does not breach the flood management conditions of Christchurch City Council's comprehensive stormwater network discharge consent.</p> |
|--|--|--|--|--|---|

## Chapter 8 – Subdivision, Development and Earthworks

| Provision  | Support         | Change requested   | Comments         |
|--|-----------------|--|------------------|
| 8.8.12 Natural and cultural heritage<br>8.8.13 All Rural Zones | Support in part | Renumber: 8.8.12 Additional matters – Subdivision around residential units within the Medium and High Density Residential Zones<br>To 8.8.16 Additional matters – Subdivision around residential units within the Medium and High Density Residential Zones<br>For consistency with previous numbering | Numbering issue. |

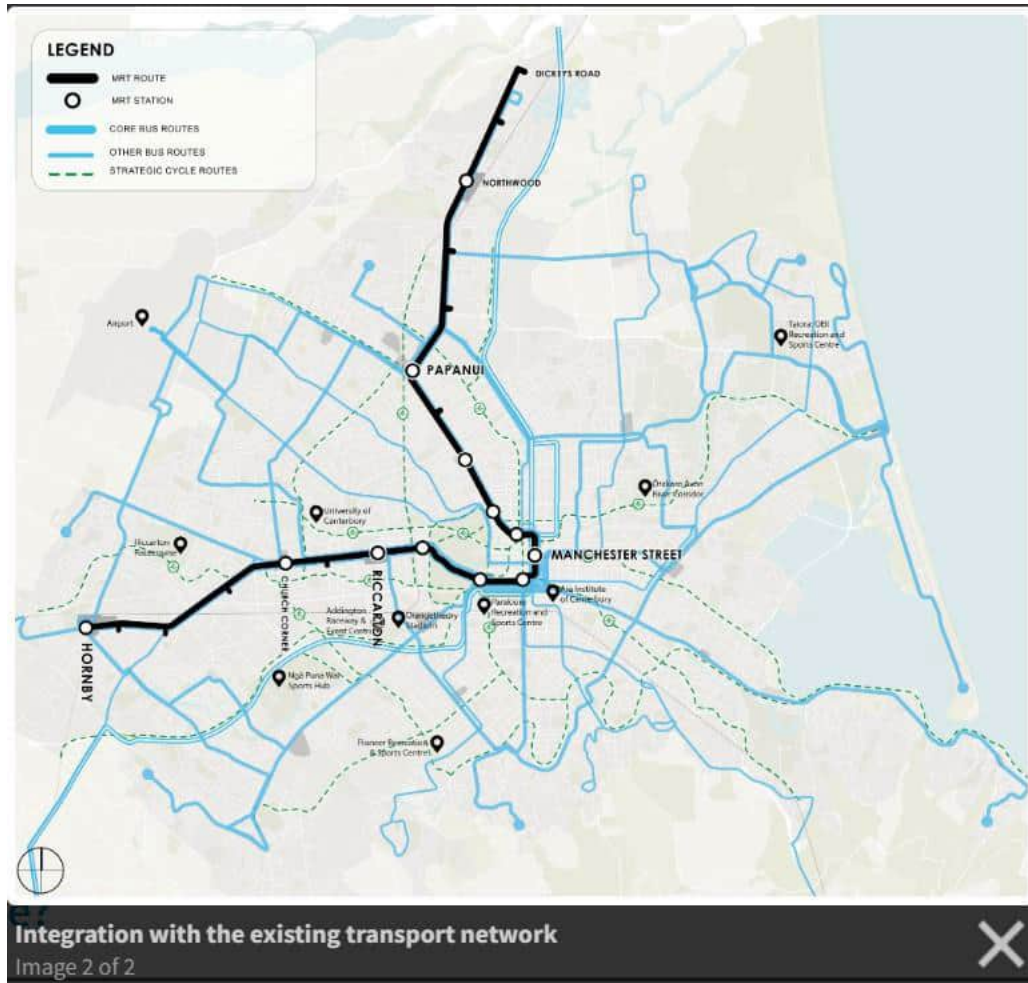
|  |  |   |  |
|--|--|---|--|
| <p>8.8.12 Additional matters – Subdivision around residential units within the Medium and High Density Residential Zones</p> <p>8.8.13 Additional matters – Subdivision in the Medium and High Density Residential Zones at north Halswell</p> |  | <p>Renumber: 8.8.13 Additional matters – Subdivision in the Medium and High Density Residential Zones at north Halswell<br/>To 8.8.17 Additional matters – Subdivision in the Medium and High Density Residential Zones at north Halswell<br/>For consistency with previous numbering</p> |  |
|--|--|---|--|

## Chapter 14 - Residential

| Provision                      | Support         | Change requested   | Comments  |
|--------------------------------|-----------------|--|---|
| 14.4.1.1. Permitted Activities | Support in part | CRC requests that instances in the permitted activities table (specifically P10, P11 and P12) of 'the tsunami inundation area as set out in Environment Canterbury report number R12/38 4 "Modelling coastal inundation in Christchurch and Kaiapoi from a South American Tsunami using topography from after the 2011 February Earthquake (2012), NIWA"; as shown in Appendix 14.16.5' be replaced with 'the Tsunami Management Area', to reflect the updated area. | The provisions have not been updated to reflect the most recent data available from NIWA. |

While not related to specific provisions, CRC considers that careful assessment needs to be made of the effects of having more solid fuel home heating appliances in some areas, and restrictions on their installation may need to be considered. CRC requests that consideration be given to developing an overlay that identifies areas with poor air quality, to be used to require that no more wood-burners are able to be installed than are there currently. CRC understands that there is a balance to be struck between negatively impacting on air quality through intensification and a resulting larger number of wood-burners in a given area, and improved air quality as a result of lower emissions from motor vehicles as intensification decreases journey numbers and distances.

### Attachment 1: Map showing integration with existing transport network



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

## Submitter Details

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

**First name:** Redwood Gardens Holding Limited **Last name:** Redwood Gardens Holding Limited

**Organisation:** Redwood Gardens Holding

Limited

**Preferred method of contact** Email

**Postal address:** PO Box 35

**Suburb:**

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8140

**Email:** Sam Kealey

**Daytime Phone:** 021 057 3762

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

Plan Change 14 Submission- 567 Wairakei Road-FINAL



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

## Submitter Details

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

**First name:** Redwood Gardens Holding Limited **Last name:** Redwood Gardens Holding Limited

**Organisation:** Redwood Gardens Holding

Limited

**Preferred method of contact** Email

**Postal address:** PO Box 35

**Suburb:**

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8140

**Email:** sam@townplanning.co.nz

**Daytime Phone:** 021 057 3762

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Plan Change 14 Submission- 567 Wairakei Road-FINAL

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

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To: **Christchurch District Council**

Name of Submitter: **Redwood Gardens Holding Limited**

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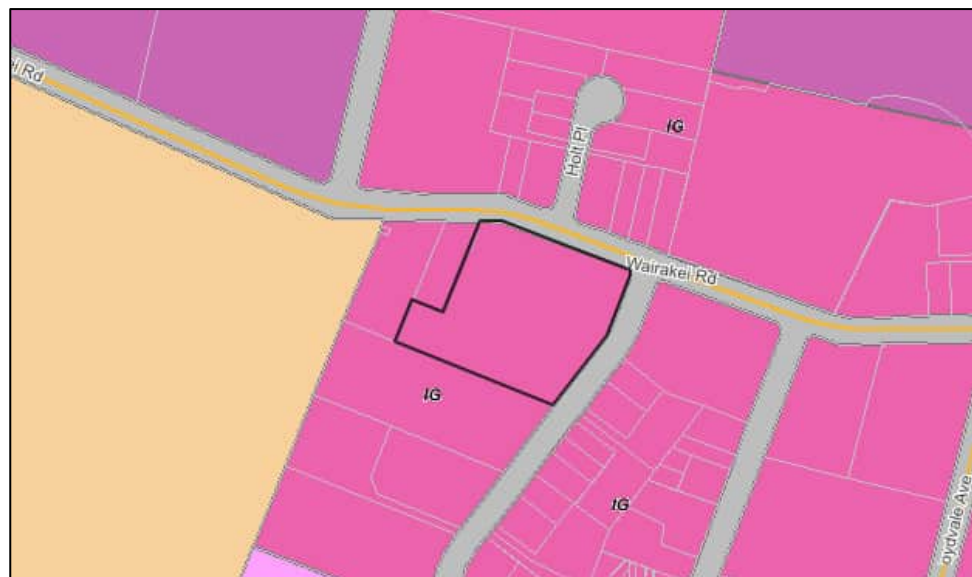
**Background**

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

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

### Introduction

- 5. This is a submission on PC14 made by Redwood Gardens Holdings Limited (**the submitter**). The submitter has interests in the property 567 Wairakei Road, Christchurch (**the site**). The site is legally described as Lot 2 Deposited Plan 490373 as held within the Record of Title 707826.
- 6. The property is depicted in **Figure 1** below.



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

- 7. The property is located on the corner of Wairakei Road which is a collector road and Sheffield Crescent which is a local road. The property has legal access from Wairakei Road.
- 8. The property is located within the Industrial General Zone under the operative District Plan. The site is proposed to remain within the Industrial General Zone under PC14.

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

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

## Submission

10. The submitters **oppose** the plan change as notified. More specifically:
  - (a) the submitter supports the intensification of urban form to provide for additional development capacity, particularly near the city and commercial centres, and supports any provisions or changes to the District Plan that will achieve this outcome; and
  - (b) the submitter opposes any provisions or changes that will adversely affect the outcome in (a);
  - (c) the submitter request that the site and surrounding properties are rezoned to an alternative zone that provides for more intense commercial activity, better giving effect to the NPS-UD.
11. Policy 3 of the NPS-UD is of direct relevance, whereby at sub clause (d) it directs that the district plan is to enable building heights and density of urban form commensurate with the level of commercial activity and community services.
12. The submitters' site is developed with commercial buildings, which the submitters lease to several different commercial organisations. The tenancies include office activities, which have been established since the Canterbury Earthquakes and prior to the current version of the Christchurch District Plan. The character of activity on the site is clearly commercial and not industrial.
13. A commercial zone would more appropriately reflect the character of existing activity on the site. Office tenancies on the site have been long established but are not enabled by the existing Industrial General zoning, creating consenting costs and barriers. The existing zoning does not reflect the high degree of established commercial and office activity on the Site and in the surrounding area. The submitters consider that a commercial zoning would more appropriately reflect the existing and future environment.
14. Rezoning the site to an appropriate commercial zone along with commensurate changes to the District Plan to provide for this submission and give effect to the NPS-UD will:
  - (a) contribute to the social and economic well-being of communities and meet the reasonably foreseeable needs of future generations;
  - (b) represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means;
  - (c) give effect to the NPS-UD (notably Policy 3) and Canterbury Regional Policy Statement; and
  - (d) promote the sustainable management of natural and physical resources, will be consistent with Part 2 of the Resource Management Act 1991 and ultimately achieve its purpose.

**Relief Sought**

15. The submitter seeks the following relief:
- (a) Rezone the site and surrounding properties to an appropriate commercial zone; or
  - (b) Amend the current zone as it relates to the Site and surrounds to more accurately reflect the range of commercial activities and buildings, and provide a framework to enable those uses to continue and evolve in the future;
  - (c) Include provisions to enable the range of matters outlined in paragraph 4 above that together assist with ensuring PC14 gives effects to the NPS-UD
  - (d) any other additional or consequential relief to the District Plan, including but not limited to, the maps, issues, objectives, policies, rules, controls/discretions, assessment criteria and explanations that will give effect to the matters raised in this submission and the relevant planning legislation.

**Other**

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

**DATED** 12 May 2023

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

Redwood Gardens Holding Limited

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

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

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

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To: **Christchurch District Council**

Name of Submitter: **Redwood Gardens Holding Limited**

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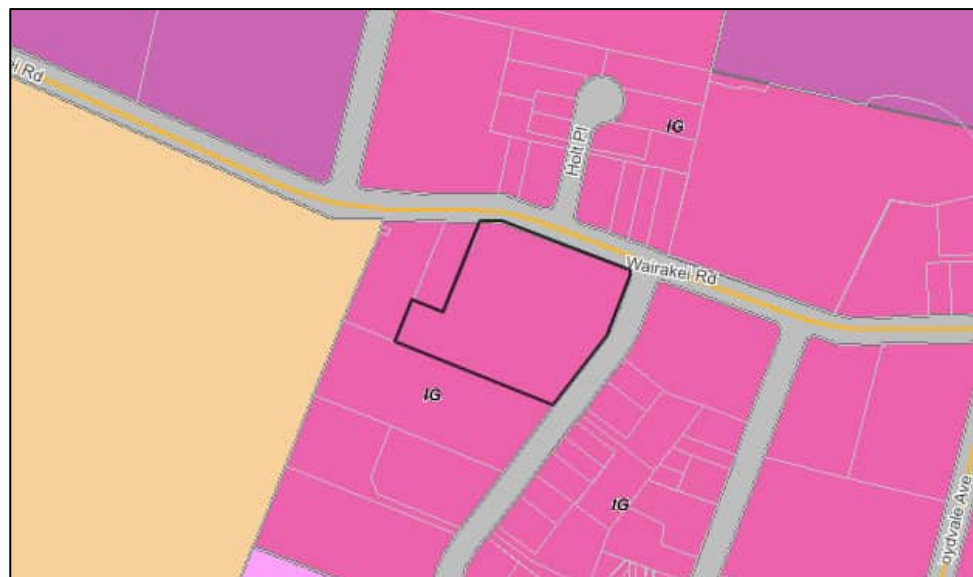
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17. The submitters wish to be heard in support of their submission.
18. If others make similar submissions, the submitter will consider presenting a joint case at any hearing.

**DATED** 12 May 2023

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

Redwood Gardens Holding Limited

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

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

## Our proposed Housing and Business Choice Plan Change (PC14)

### Submitter Details

**First name:** Sam **Last name:** Kealey

**Organisation:** Redwood Gardens Holding

Limited

**Preferred method of contact** Email

#### Postal address:

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** sam@townplanning.co.nz

**Daytime Phone:** 0210573762

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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:

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

#### Attached Documents

File

Lee Pee Limited-copy of submission

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

## Submitter Details

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

**First name:** Ross **Last name:** Clarke

**Preferred method of contact** Email

**Postal address:** 811 Jones Road

**Suburb:**

**City:** Rolleston

**Country:** New Zealand

**Postcode:** 7614

**Email:** ross@rs3.co.nz

**Daytime Phone:** 0273477515

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

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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:** 91.1

- 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***

For the reasons expressed in the submission above, I the submitter consider the properties at 370, 390 & 432 Johns Road, Harewood should be rezoned IG, accounting for the attributes of the land/locality and in order to meet the requirements of the NPS-UD.

I look for relief sought by amending the planning maps to rezone the properties at 370, 390 & 432 Johns Road, Harewood as

Industrial General (IG).

### **My submission is that**

This is a submission on the proposed plan change 14 (*PC14*) to the Christchurch District Plan (the *District Plan*). I have an interest in the three properties at 370, 390 & 432 Johns Road, Harewood, Christchurch. My submission relates to the whole of PC14, however, the specific relief sought by rezoning of Industrial General land.

We have recently undertaken an economic assessment of available Industrial General land within Christchurch City and specifically 370, 390 & 432 Johns Road, Harewood with the economic conclusion stated as 'Accordingly, I agree that there is likely to be a shortage of suitable/available industrial land (in the right locations), which the proposal of 370-432 Johns Road would directly address. Accordingly, I would be happy to support the proposal on economic grounds'

Other commentary from industry insiders stated 'In terms of developed industrial properties there are very few vacancies that exist. Research shows Christchurch's total industrial vacancy decrease from 2.6% in June 2022 to 0.8% in December 2022. The largest reduction occurred in Grade A stock like Johns Road where vacancy dropped from 2.1% to 0.1% over the same period'

Given the context described above, the current zoning of the land is ineffective, inefficient and inappropriate. Conversely, Industrial General (IG) zoning is the most appropriate zoning for the land, accounting for the current and likely future activities on the land and the directives in the NPS-UD, including policies 1, 2, 3 and 4. Accounting for the above, I consider that IG zoning is appropriate for the properties at 370, 390 & 432 Johns Road, Harewood and the planning maps should be amended accordingly.

I wish to be heard in support of the submission. If others make a similar submission then I will consider presenting a joint case with them at hearing.

---

#### Attached Documents

| File                   |
|------------------------|
| No records to display. |

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

## Submitter Details

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

**First name:** David **Last name:** Murison

**Preferred method of contact** Email

**Postal address:** 69A Halton Street

**Suburb:** Strowan

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8052

**Email:** murisd67@gmail.com

**Daytime Phone:** 021533747

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

Yes

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

## Attached Documents

File

Submission document from David Murison

## Christchurch District Plan

## Plan Change 14

I live in Halton Street, Strowan and I am concerned that the proposed Housing and Business Choice Plan Change 14 (PC14) will have a significant negative impact on the character and quality of our immediate and surrounding neighbourhood as well as placing unacceptable pressure on transport, stormwater and wastewater infrastructure in the local area.

To illustrate by example - in the last year, Council relaxed on-site parking requirements for new developments (typically to one space per residential unit) has already had a significant impact in many locations. The recent allowance to there being no on-site carparks required for new developments, and now the proposed change for High Density Residential Zone (HRZ) and Medium Density Residential Zone (MRZ) to also not be required to make provision for ANY on-site parking and place additional pressure on basic transport infrastructure which will inexorably increase the impact in the Strowan neighbourhood.

### 1. INFRASTRUCTURE

Relevant PC14 clause references and extracts are given in **RED itallics following**

*Section 14.2.8.5 Policy – Infrastructure servicing for developments*

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

*Section 14.2.8.6 Policy – Integration and connectivity*

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

I suggest that it is universally accepted that 'infrastructure' includes adequate carparking and a safe and effective transport network which does not contribute to traffic congestion. and a functioning and effective stormwater and wastewater network.

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

- the supply of on-street carparking spaces currently cannot keep-up with the demand for carparking, resulting in the very recent expansion of time-based (two hour maximum) parking restrictions on most surrounding streets. The presence of St Andrews' College, which defines the southeast limit of Strowan, a Year 1-13 school and preschool, is the most significant contributor. The school has a roll of 1700 students and around 250 teachers and staff with only minimal on-site parking provided. Day students who hold a drivers licence drive from all parts of greater Christchurch to attend the College. St Andrews' College, established in 1917, has effectively become a 'destination, independent school of choice' as it is the only co-educational, preschool, primary and secondary school in the South Island. The school is growing with a large waiting list for entry. The presence of the Waimairi Tennis Club in the neighbourhood also contributes to the overall pressure on on-street carparking. Any increase in housing density in the Strowan community (that is either MRZ or HRZ) will magnify this existing, significant on-street carparking problem as new housing developments are no longer required to provide any on-site carparking. Of particular concern is that the

PC14 proposes to enable HRZ along Papanui Road and one block either side of Papanui Road which is obviously at a higher level of intensification than even MRZ. As there is little on-street carparking permitted on Papanui Road (none for five hours on weekdays due to the presence of priority bus lanes), and no on-site carparking required for new residential developments, carparking associated with ALL of this intensification will further exacerbate the carparking issues in the Strowan community;

- the existing traffic management issues associated with St Andrews' College also pose a significant health and safety issue – from morning and afternoon congestion in Normans Road and surrounding streets at school drop-off and pick-up times, drivers double parking and parking over broken yellow lines and 'rat running' around the Strowan streets to seek to avoid congestion, causing delays and congestion at intersections linking with surrounding primary roads including Papanui Road and Strowan Road. All of these issues will be exacerbated by the proposed intensification of residential development in the community but especially by the proposed HRZ over many blocks,

Relevant PC14 clause references and extracts are given in **RED itallics following**

*Section 14.6.2 Built form standards*

*a The following built form standards shall be met by all permitted activities and restricted discretionary activities RD2, unless otherwise stated.*

*Advice note:*

*1. There is no spare, or limited, wastewater, storm water, or water supply infrastructure capacity in some areas of Christchurch City which may create difficulties in granting a building consent for some developments. Alternative means of providing for those services may be limited or not available. Compliance with the District Plan does not guarantee that connection to the Council's reticulated infrastructure is available or will be approved. Connection to the Council's reticulated infrastructure requires separate formal approval from the Council. There is a possibility that approval to connect will be declined, or development may trigger the need for infrastructure upgrades or alternative servicing at the developer's cost.*

I am referring to this Clause as it is not obvious where else this issue is covered.

My specific concerns in relation to the impact of the proposed changes on the stormwater and wastewater networks in our local community of Strowan are as follows:

- there are already pockets of flooding in rainfall events in Strowan – with Brenchley Avenue being one example where both the stormwater and wastewater networks do not cope in these events. HRZ intensification of the extent proposed in PC14 will exacerbate this across the neighbourhood. This is a known consequence of urban intensification in Christchurch (and elsewhere) as a greater density of 'hard' surfaces (eg roof, yard, path and paved areas) is created and a consequential reduction in 'soft' surfaces (eg grass, landscape areas) which unquestionably increases the flow rates of stormwater discharge to the side channel and gives rise to infiltration of this uncontrolled stormwater into the wastewater system giving rise to overflows and resulting sewage contamination of waterways, streams and surface water. (The serious flooding in many parts of Auckland over the period 27 February-2 February 2023 highlighted this impact of urban intensification dramatically). All of these issues will be exacerbated by the proposed intensification of residential development in the

community but especially by the proposed HRZ over many blocks, immediately adjacent to the current problem areas.

## 2. AMENITY/CHARACTER

Relevant PC14 clause references and extracts are given in **RED itallics following**

*Section 14.2.4.2 Policy – High quality, medium density residential development*

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

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

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

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

## 3. LACK OF CARPARKING PROVISION FOR VULNERABLE MEMBERS OF OUR COMMUNITY

Relevant PC14 clause references and extracts are given in **RED itallics following**

*Section 7.2.1.2 Policy – High trip generating activities*

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

*Section 7.2.1.5 Policy – Design of Carparking areas and loading areas*

*iii be accessible for people whose mobility is restricted*

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



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

This impact will be significant on both

- existing residents and
- residents living in new developments

as increasingly they and their visitors will not be able to expect and/or rely on their ability to park close to their place of residence. This will be exacerbated significantly in the Strowan area where the current on-street carparking supply does not meet demand and this is a further reason why the proposed HRZ must not be implemented. I have been unable to find any specific references in PC14 as to how the transitional change (clearly over many years) will impact on the needs of these vulnerable groups in our community and how it will be mitigated. If this is the case it is very concerning that PC14 is so lacking in provision.

#### **4. CHANGE FROM HRZ TO MRZ IN STROWAN – SO AS TO BE CONSISTENT WITH STATED INTENTION**

Relevant PC14 clause references and extracts are given in **RED itallics following**

##### *Section 14.2.7 Objective – High Density Residential Zone*

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

##### *Section 14.2.7.2 Policy – High density location*

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

*i. City centre zone;*

*ii. Town Centre zones of Riccarton, Papanui, and Hornby; and*

*iii. Other larger commercial centres zoned as Town Centres and Local Centres; to a degree that responds to the planned scale and nature of each centre group and the range of activities planned or provided there.*

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

In requesting a change in PC14 as proposed, I would highlight the following anomaly. I have studied 'The proposed zones' (on page 9 of the Consultation document) and my analysis has been confirmed by relevant Council staff, that the specific intention is to have a proposed 'Larger Town Centre' zone in the vicinity of the Merivale commercial centre with an associated HRZ stretching as far north as Heaton Street/Innes Road. In a similar manner, it is clear that a proposed 'Larger Town Centre' zone be created in the vicinity of the Papanui commercial centre with an associated HRZ stretching as far south as Blighs Road. But the planning maps contradict this and show these HRZ areas as joined or continuous along the spine of Papanui Road.

I suggest therefore that the significant infrastructure pressure and other issues which I have highlighted in this submission, which are already impacting the Strowan community particularly in the vicinity of St Andrews' College, could be mitigated by Council following the approach which they themselves have outlined in the Consultation document. That is, by limiting the HRZ as detailed (north from the Merivale commercial centre to Heaton Street/Innes Road and south from the Papanui commercial centre to Blighs Road) and not extending the HRZ along this stretch of Papanui Road through the Strowan community.

### **Conclusion/Recommendation**

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

I seek that this change be made by way of 'Area limited by Qualifying Matters' or other appropriate means for the following reasons:

- the area has existing significant infrastructure issues (including carparking, vehicle congestion, flooding issues which impact both stormwater and wastewater systems);
- the presence of St Andrews' College is important. Whilst the College undoubtedly enhances and reinforces the character of the neighbourhood, the impact of its attraction to families across the city as providing education of a 'special character', means that the College's current and future growth places pressure on the local community (in terms of carparking, traffic congestion)
- the amenity value of the neighbourhood would be negatively impacted. There is a character of older quality housing on larger than average sections which reinforces the reality of open space, and recent low rise (typically two storey), new housing developments of a consistent appropriate quality suitable for families, where many existing trees have been retained with on-site carparking provided;
- the sense of community which is present and increasing would be undermined by the scale of intensification which is proposed under HRZ;
- there are a number of prominent trees remaining in the neighbourhood which reinforces the quality of open space and clearly supports the Council's Urban Forest Plan 2023 initiative; but which would inevitably be threatened with the high level of intensification under HRZ as proposed in Plan Change 14.

Noting that the following extract is taken from Council's PC14 documentation

#### *Areas limited by Qualifying Matters*

*Not all parts of our city are suitable for the level of increased development. Some areas have qualities, known as Qualifying Matters, which mean rules enabling increased development will be modified to maintain and protect those qualities or manage their effects.*

*This may include keeping a lower level of residential density and building heights, or managing development through specified matters and resource consent conditions*

David Murison

69a Halton Street, Strowan



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

## Submitter Details

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

**First name:** Henri **Last name:** Murison

**Preferred method of contact** Email

**Postal address:** 69A Halton Street

**Suburb:** Strowan

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8052

**Email:** henri.murison12@gmail.com

**Daytime Phone:** 0225274584

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

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

Note to person making submission:

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

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

Yes

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

## Attached Documents

File

Submission document from Henri Murison

## Christchurch District Plan

## Plan Change 14

I live in Halton Street, Strowan and I am concerned that the proposed Housing and Business Choice Plan Change 14 (PC14) will have a significant negative impact on the character and quality of our immediate and surrounding neighbourhood as well as placing unacceptable pressure on transport, stormwater and wastewater infrastructure in the local area.

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I suggest therefore that the significant infrastructure pressure and other issues which I have highlighted in this submission, which are already impacting the Strowan community particularly in the vicinity of St Andrews' College, could be mitigated by Council following the approach which they themselves have outlined in the Consultation document. That is, by limiting the HRZ as detailed (north from the Merivale commercial centre to Heaton Street/Innes Road and south from the Papanui commercial centre to Blighs Road) and not extending the HRZ along this stretch of Papanui Road through the Strowan community.

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

Noting that the following extract is taken from Council's PC14 documentation

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Henri Murison

69a Halton Street, Strowan



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

## Submitter Details

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

**First name:** Paul **Last name:** Keung

**Preferred method of contact** Email

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** mona@novogroup.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:** 94.1

- Support
- Oppose
- Seek Amendment

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

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

refer to attached submission document

**My submission is that**

refer to attached submission document

---

Attached Documents

| File                          |
|-------------------------------|
| PC14 Submission KI Commercial |

## Form 5

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

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

**To** Christchurch City Council

**Name of submitter:** KI Commercial Limited

- 1 This is a submission on Plan Change 14 (**PC14**) to the Christchurch District Plan (the **Plan**).
- 2 KI Commercial could not gain an advantage in trade competition through this submission.
- 3 KI Commercial's submission relates to the whole of PC14. However, the specific relief sought by KI Commercial is set out at **Annexure A** and a summary of their key submission points follows.
- 4 In summary, KI Commercial has interests in the property at 51 Heberden Avenue. Under the Operative District Plan as well as PC14, this property is zoned Residential Hills (RH) and Rural Port Hills (RuPH).
- 5 This submission seeks that the upper section of the property be rezoned RH and RuPH, in recognition of the existing legal boundaries and ownership of the property. 51 Heberden and the neighbouring sites to the northeast and southwest (for instance, 37, 39 and 71 Heberden Avenue) are primarily zoned residential, i.e. residential development is provided for and anticipated in this area. However, the split zoning of the properties unnecessarily restricts development of these sites. The land to the south-east is zoned RuPH. The direct interface between the rural and residential environment and the rural amenity are considered to be adequately managed and maintained through the zoning provisions in PC14.
- 6 Given the context described above, the split zoning of the land is ineffective, inefficient and inappropriate. Conversely, residential zoning across the entirety of the site, is sought accounting for the provisions in the NPS-UD and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act.
- 7 KI Commercial seeks the following decision from the local authority:
  - 7.1 The relief as set out in **Annexure A**.
  - 7.2 Any other similar relief that would address the relief sought by KI Commercial.
  - 7.3 All necessary consequential amendments.
- 8 KI Commercial **wishes to be heard** in support of the submission.
- 9 If others make a similar submission, KI Commercial will consider presenting a joint case with them at a hearing.



Figure 1. Subject site

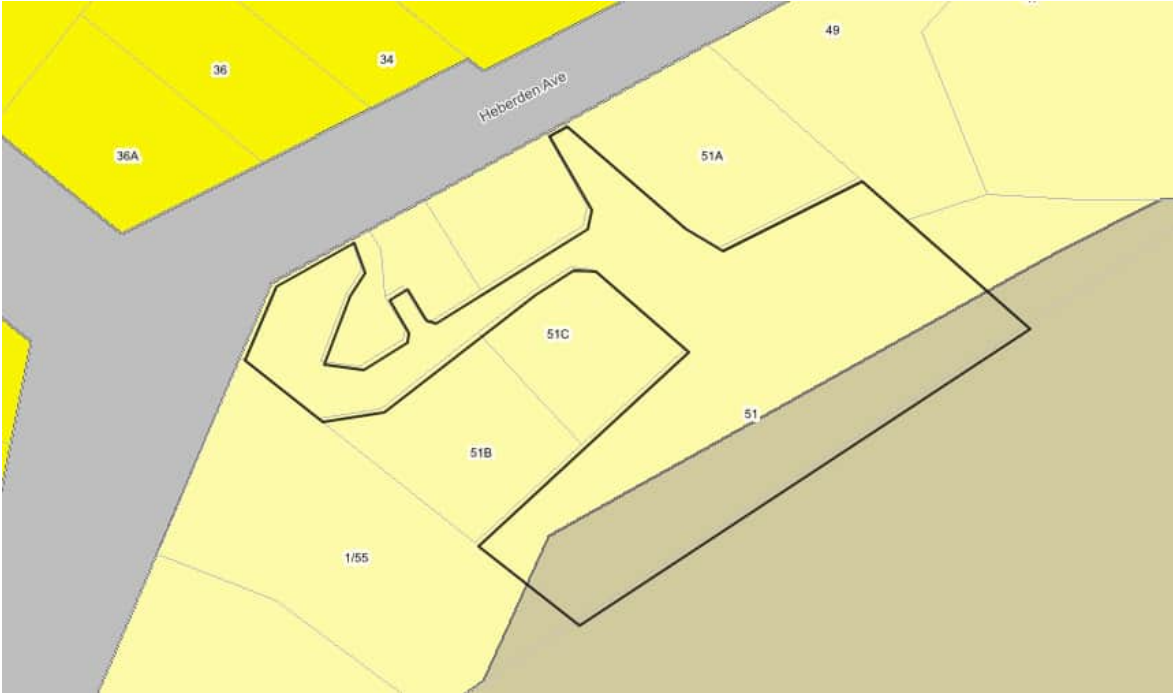


Figure 2. Proposed zoning of the site

**Signed** for and on behalf of KI Commercial Limited by its authorised agent:



---

M Neumann  
Planner  
12 May 2023

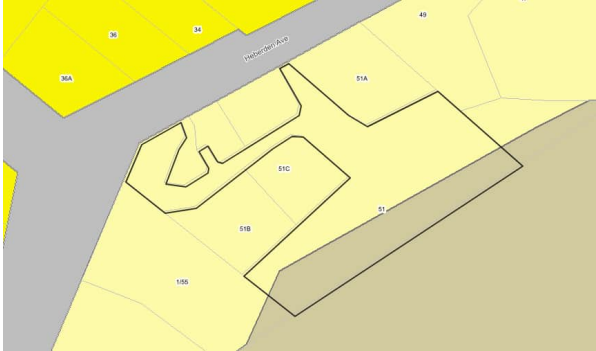
Address for service of submitter:

KI Commercial Limited  
c/- Novo Group Limited  
Attention: Mona Neumann  
PO Box 365  
Christchurch 8013  
Email: [mona@novogroup.co.nz](mailto:mona@novogroup.co.nz)

## ANNEXURE A

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

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

| No. | Provision       | Position | Submission  | Relief Sought  |
|-----|-----------------|----------|---|--|
| 1.  | Planning Map 48 | Oppose   | <p>For the reasons expressed in the submission above, the submitter considers the property at 51 Heberden Avenue in its entirety should be rezoned RH or MDR considering the legal boundaries of the underlying titles and in order to meet the requirements of the NPS-UD.</p> <p>The proposed qualifying matters relating to natural hazards (namely the Coastal Hazard Medium Risk Management Area, Coastal Hazard High Risk Management Area and Tsunami Management Area) are not relevant to this steep hill site where there is no risk of inundation.</p> | <p>Amend the planning maps to rezone the entirety of the site at 51 Heberden Avenue (as shown in <b>Figure 1</b> above) residential (either Residential Hills or Medium Density Residential) and the removal of all qualifying matters.</p>  |



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

## Submitter Details

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

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 95.1

- 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 refer to appended submission documents.

**My submission is that**

Please refer to appended submission documents.

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**Original Submitter:****Original Point:****Points:** 95.2

- 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*

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**My submission is that**

Please refer to appended submission documents.

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**Original Submitter:****Original Point:****Points:** 95.3

- 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*

Please refer to appended submission documents.

**My submission is that**

Please refer to appended submission documents.

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**Original Submitter:****Original Point:****Points:** 95.4

- 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*

Please refer to appended submission documents.

**My submission is that**

Please refer to appended submission documents.

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**Original Submitter:****Original Point:****Points:** 95.5

- 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*

Please refer to appended submission documents.

**My submission is that**

Please refer to appended submission documents.

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**Original Submitter:**

**Original Point:**

**Points:** 95.6

- 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 refer to appended submission documents.

**My submission is that**

Please refer to appended submission documents.

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Attached Documents

| File  |
|---|
| THONW Inc PC13 PC14- submission- 12-05-2023 |
| Schedule 1- submission points               |



## Form 5

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

Clause 6 of Schedule 1, Resource Management Act 1991

10<sup>th</sup> May 2023

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

Submission lodged by email: [engagement@ccc.govt.nz](mailto:engagement@ccc.govt.nz)

**Name of submitters:** Te Hapū o Ngāti Wheke (Rāpaki) Rūnanga (referred to below as **Rāpaki Rūnanga**)

**This is a submission in support of:** Plan Change 13 (Heritage) and Plan Change 14 (Housing and Business Choice) to the Christchurch District Plan.

1. Rāpaki Rūnanga **could not** gain an advantage in trade competition through this submission.
2. Rāpaki Rūnanga does **wish** to be heard in support of this submission at a hearing.
3. If others make a similar submission, we **will** consider presenting a joint case with them.

### 1. Te Hapu o Ngāti Wheke Rāpaki Rūnanga

- 1.1 Centuries before Columbus voyaged to the Americas, Tamatea-Pokai-Whenua was exploring Aotearoa. On his trip back north from Murihiku, he stopped off in the hills above Te Rāpaki o Te Rakiwhakaputa. But a southerly storm struck. His party's fire sticks had gone out, so Tamatea recited the necessary karakia and called to his atua at Ruapehu, Tongariro and Ngauruhoe to send him fire. This they did and though some fell to the ground at Te Whakatakanga-o-te-ngarahu-o-te-ahi-o-Tamatea (Hanmer Springs), it eventually arrived, and the evidence can still be seen today at Te Ahi a Tamatea. 1,000 years later Pakeha call that same hill Rāpaki Rock. Nearby, the distinctive cone-shaped hill which dominates Rāpaki is Te Poho o Tamatea.
- 1.2 About the beginning of the 18<sup>th</sup> century, Te Rakiwhakaputa, a Ngāi Tahu rangatira toa of Kāti Kuri descent, came up the harbour Whakaraupō – so named by Tamatea after the raupō which was then growing at the head of the harbour.

- 1.3 The Kāti Kuri / Ngāi Tahu war party fought and defeated the resident manawhenua Ngāti Mamoe at Ōhinehou (now Lyttelton). That battle was marked by naming the hills above Ōhinehou, Ōkete-upoko, a name which was still used in 1849 with the signing of the Port Cooper Deed when Ngāi Tahu sold most of the Whakaraupō catchment to the British Crown. Another major battle between Ngāi Tahu and Ngāti Mamoe was at Ōhinetahi, a pā site on the low ridge near the sea to the south of current Governor's Bay.
- 1.4 The traditional story is that Te Rakiwhakaputa confirmed his take raupatu by casting his rāpaki (waist mat) on the beach and the kaika has ever since been known as Te Rāpaki o Te Rakiwhakaputa. He also more strategically ensured his descendants' manawhenua rights to this takiwā by marrying Hine-te-a-Wheke who had Ngāti Mamoe whakapapa.
- 1.5 Once the main fighting in Whakaraupō was done Te Rakiwhakaputa moved on, but to ensure ahi kaa he left his son Manuwhiri who built Te Pa Whakataka (near the current tennis courts in Governors Bay). Another son Wheke settled at Rāpaki and the hapū there has become known as Ngāti Wheke and are manawhenua of Whakaraupō and some adjacent areas. Wheke's name is also marked by the hill above Cass Bay known as Te Moenga-a-Wheke, or The Great Tor. Wheke maintained a pā at Ōpawaho near where the rail and road cross the Ōpawaho. Ngāti Wheke regard the Ōpawaho as the northern edge of the hapū takiwā.
- 1.6 On 10 August 1849 the Whakaraupō/ Port Cooper Deed was signed by Walter Mantell and 18 Ngāi Tahu. For £200 the Crown received 65,000 acres and left Ngāti Wheke with 850 acres at Rāpaki as Native Reserve 875. A Census in 1857 listed 48 Ngāi Tahu living at Rāpaki, 12 in Taukahara and 12 in Pūrau. 50 years later only the Rāpaki kaika remained.
- 1.7 Community buildings built in Rāpaki were: 1869 the Wesleyan Church; 1874 Catholic Church; 1878 Māori School, 1901 Rūnanga hall and in 1916 the jetty and war memorial 'Gallipoli'. The school ceased functioning as a school in 1946. The school still stands butt the Catholic Church which was demolished about 1950. The hall was replaced with a new Whare Tipuna in 2011. This is a whare whakairo and the carvings, inside and out, represent the whakapapa of Rāpaki and the mana whenua who live there.

### ***Te Hapū o Ngāti Wheke (Rāpaki)***

- 1.8 Te Hapū o Ngāti Wheke (Rāpaki) is the modern-day representative of the hapū Ngāti Wheke. The takiwā of the Rūnanga reflects the events and deeds of Te Rakiwhakaputa and his sons Manuwhiri and Wheke; events and deeds that secured their descendants' manawhenua rights to the area. The takiwā centres on Rāpaki and the catchment of Whakaraupō and is described in the Port Cooper Deed of 1849 (English translation):

*“The inland boundary commences at the mouth of the Opawa thence along [the Halswell River] to Waihora; the outer boundary commences at Kaitara [Port Levy], thence by Te Pohue [Monument], thence by the Ahupatiki [Mt Herbert] ridge to Waihora following the line of the said mountain to Kuhakawariwari.”*

- 1.9 The Rāpaki Takiwā is further defined in Te Rūnanga o Ngāi Tahu (Declaration of Membership) Order 2001. Rāpaki Rūnanga have the responsibility to act as kaitiaki over these lands and are active in the environmental management of their takiwā. A map of the takiwā (and as covered by the Mahaanui Iwi Management Plan) is contained in **Appendix One**.

## 2. Introduction

- 2.1 This submission is made on behalf of Te Hapū o Ngāti Wheke Rāpaki Rūnanga (referred to as **Rāpaki Rūnanga**) on Plan Change 13 and Plan Change 14 to the Christchurch District Council.
- 2.2 Rāpaki Rūnanga acknowledges the engagement Christchurch City Council has had with Mahaanui Kurataiao (on behalf of papatipu rūnanga) during the preparation of the proposed plan changes. It is noted there was a principal focus on Strategic Directions (Chapter 3 of the District Plan), and qualifying matters regarding papakainga/ kāinga nohoanga, with agreement to take a collaborative approach to advance a separate plan change in the future to enable additional papakainga/ kāinga nohoanga within the Christchurch District and surrounds. As such, this submission does not seek to undermine those discussions and instead focuses on the Rāpaki Rūnanga takiwā to ensure the natural resources (primarily within the Lyttelton catchment) are managed in accordance with Rāpaki Rūnanga values.

## 3 Ngāi Tahu Values

- 3.2 As set out in the Mahaanui Iwi Management Plan 2013, there are a number of key values, principles and practices that shape Ngāi Tahu views on the environment and resource management. Rāpaki Rūnanga identifies the following values in relation to the proposed plan provisions:

### *Manawhenua*

- Manawhenua is the right to exercise authority over a particular area, its resources and its people. Manawhenua is passed on by way of whakapapa and is protected and secured through the on-going exercise of one’s rights to resources in a manner consistent with tikanga. As noted above, Rāpaki Rūnanga represents the interests of Ngāti Wheke who have kaitiaki and manawhenua interests in the Rāpaki and the Whakaraupō catchment.

### *Kaitiakitanga*

- Kaitiakitanga is fundamental to the relationship of Ngāi Tahu and the environment. The responsibility of kaitiakitanga is twofold: first, there is the ultimate aim of protecting mauri and, second, there is the duty to pass the environment to future generations in a state which is as good as, or better than, the current state. To Rāpaki Rūnanga, kaitiakitanga is not a passive custodianship, nor is it simply the exercise of traditional property rights but entails an active exercise of responsibility in a manner beneficial to the resource.
- Ngāi Tahu whānui are both users of natural resources, and stewards of those resources. At all times, Ngāi Tahu is guided by the tribal whakataukī: “mō tātou, ā, mō kā uri ā muri ake nei” (for us and our descendants after us).

### *Whanaungatanga*

- Rāpaki Rūnanga has a responsibility to promote the wellbeing of the tangata whenua of Ngāti Wheke and ensure that the management of its assets and the wider management of its natural resources to support the development of hapū members.

## **4 Relief sought- General**

- 4.2 Rāpaki Rūnanga **supports** the plan provisions except where we ask for specific amendments or additions as set out in **Schedule One** attached.
- 4.3 This submission has been drafted as a whole, with interlinking submission points. While a submission point may have been made against one provision consequential changes will be required to other related provisions within the plan to ensure consistency across the plan and to address the concerns raised.

## **5 Reasons- General:**

- 5.2 The amendments and additions sought to these plan changes by Rāpaki Rūnanga are to better incorporate the broader interests and aspirations of Rāpaki Rūnanga in its takiwā within the Christchurch District. The submitter considers these changes are necessary to:
- Better achieve the purpose of the of the Resource Management Act 1991 (**RMA**), including matters under s6, having particular regard to kaitiakitanga as required under s7(a) of the RMA, and taking into account the principles of the Treaty as required under s8 of the Act;
  - Take into account the relevant iwi management plan namely:
    - Mahaanui Iwi Management Plan 2013
 As required under s74(2A) of the RMA; and

- Consequently, discharge the councils' duties under s32 of the RMA.
- 5.3 These reasons apply to every decision requested in this submission, along with any additional reasons listed under each submission point in **Schedule 1**.
- 5.4 **Decisions sought:**
- 5.5 The specific decisions sought on Plan Changes 13 and 14 are listed in **Schedule 1**.



Mishele Radford  
Chairman  
Te Hapū o Ngāti Wheke Inc (Rāpaki Rūnanga)

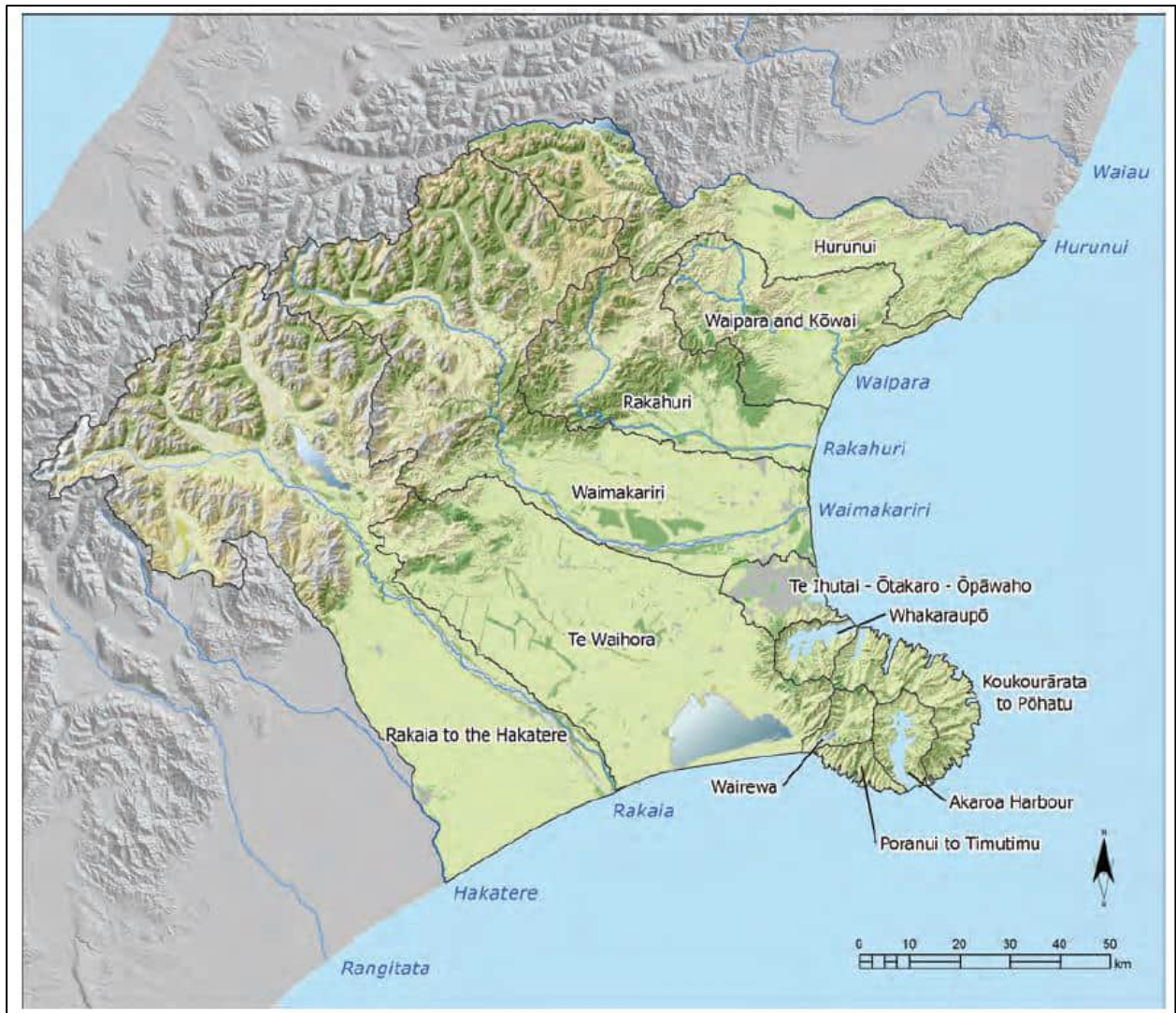
**Address for service:**

Amy Beran  
Senior Environmental Advisor - Planning  
Te Rūnanga o Ngāi Tahu  
PO Box 13 046  
Christchurch 8021

**Email:** [amy.beran@ngaitahu.iwi.nz](mailto:amy.beran@ngaitahu.iwi.nz)



**APPENDIX One: Ngā Pākihi Whakatekateka o Waitaha and Te Pātaka o Rākaihutū- the takiwā covered by the Mahaanui IMP 2013**



## Schedule 1:

## Proposed Plan Change 13 &amp; Plan Change 14 of the Christchurch District Plan

## Submission by Te Hapū o Ngāti Wheke (Rāpaki) Rūnanga

| <b>Plan Change 13 (Historic Heritage) to Christchurch District Plan</b>  |                       |  |   |
|--|-----------------------|--|---|
| <b>Chapter/ Provision</b>  | <b>Position</b>       | <b>Reason</b>  | <b>Decision Sought</b>  |
| <p><b>All of Plan change 13, including:</b></p> <ul style="list-style-type: none"> <li>- <b>Chapter 2 abbreviations and definitions</b></li> <li>- <b>Chapter 8 subdivision, Development and earthworks</b></li> <li>- <b>Chapter 9.3 Historic Heritage</b></li> <li>- <b>Chapter 14.8 Residential Banks Peninsula Zone</b></li> </ul> | <b>Oppose in part</b> | <p>Rāpaki Rūnanga is concerned that their development aspirations for their whenua, particularly papakainga/ kāinga nohoanga could be further constrained through the introduction of additional heritage related provisions, which includes the introduction of additional rules for activities undertaken within prescribed heritage areas as well as more built form standards. Further, Rāpaki Rūnanga are concerned that the heritage provisions are ethnocentric and do not provide for a Ngāi Tahu worldview.</p> <p>Whilst it is acknowledged that future collaboration between Mahaanui Kurataiao and Council is proposed to enable papakainga/ kāinga nohoanga within the district, at this time the scope/extent of the proposed changes and timeframe for undertaking these future changes is uncertain. As such, Rāpaki seeks certainty that these proposed plan changes will not further restrict rūnanga led development.</p> | In terms of the proposed historic heritage provisions (as proposed by PC13), amend the provisions to enable Rāpaki Rūnanga to develop ancestral land within its takiwā to give effect to section 6 (e) of the RMA; and to enable provision for papakainga housing in accordance with s.80E (1) (b) (ii) of the RMA. |

| Plan Change 14 (Housing and Business Choice) to Christchurch District Plan   |          |   |  |
|--|----------|---|--|
| Chapter/ Provision   | Position | Reason  | Decision Sought  |
| <b>All of plan change 14, including:</b>   |          |   |  |
| <b>Chapter 6 General Rules and Procedures:</b> <ul style="list-style-type: none"> <li>- Sub-chapter 6.1A Qualifying Matters</li> </ul> | Oppose   | As noted above, Rāpaki Rūnanga is concerned about the introduction of heritage related provisions within its takiwā and the potential further development constraints in terms of enabling papakainga/ kāinga nohoanga. This specifically includes Residential Character Area Overlay and Residential Heritage Area Over which are both understood to be applied as qualifying matters. | In terms of the proposed qualifying matters that relate to historic heritage (e.g., Residential Heritage Area and Character Area Overlay) and are proposed in the Lyttelton township, amend the provisions to enable Rāpaki Rūnanga to develop ancestral land and give effect to section 6 (e) of the RMA and to enable provision for papakainga housing in accordance with s.80E (1) (b) (ii) of the RMA. |

|   |                        |  |   |
|---|------------------------|--|---|
| <p><b>Chapter Subdivision, Development and Earthworks</b></p> <p><b>Chapter 9.3 Historic Heritage</b></p> <p><b>Chapter 14.8 Residential Banks Peninsula Zone</b></p> | <p>8</p> <p>Oppose</p> | <p>Rāpaki Rūnanga is concerned that their development aspirations for their whenua, particularly papakainga/ kāinga nohoanga could be further constrained through the introduction of additional heritage related provisions, which includes the introduction of additional rules for activities undertaken within prescribed heritage areas as well as more built form standards. Further, Rāpaki Rūnanga is concerned that the heritage provisions are ethnocentric and do not provide for a Ngāi Tahu worldview.</p> <p>Whilst it is acknowledged that future collaboration between Mahaanui Kurataiao and Council is proposed to enable papakainga/ kāinga nohoanga within the urban parts of the district, at this time the scope/extent of the proposed changes and timeframe for undertaking these future changes is uncertain. As such, Rāpaki seeks certainty that these proposed plan changes will not further restrict rūnanga led development.</p> | <p>Amend the proposed provisions to enable Rāpaki Rūnanga to develop ancestral land within its takiwā to give effect to section 6 (e) of the RMA and to enable provision for papakainga housing in accordance with s.80E (1) (b) (ii) of the RMA.</p> <p>Retain existing lower density residential zoning (e.g., as prescribed in Chapter 14.8- Residential Banks Peninsula Zone) and associated activity rules (e.g., as set out under rules 14.8.1, 14.8.2, 14.8.3, 14.8.1.4 and 14.8.1.5) as well as built form standards (e.g., as prescribed in rule 14.8.2 of the District Plan), <b>except</b> where specific changes are requested (see table 2).</p> |
|---|------------------------|--|---|

| Specific Provisions- Plan Change 13 (Historic Heritage)   |                |  |  |
|---|----------------|--|--|
| Provision   | Position       | Reason   | Decision Sought  |
| <b>Chapter 8 subdivision, Development and Earthworks</b>  |                |  |  |
| 8.6.1 minimum net site area and dimension<br><br>Table 1. Minimum net site area- residential zones<br><br>f. a. | Oppose         | The proposed minimum net site area for sites located in the Lyttelton Residential Heritage Area (RHA) further restricts development potential for existing residential sites in much of Lyttelton.<br><br>Rāpaki Runanga is concerned that their development aspirations on their whenua could be further constrained by an increased minimum site area. | Provide an additional exclusion clause, whereby land which is held as Māori Land <sup>1</sup> and is in the Lyttelton Residential Heritage Area (RHA) and zoned Residential Banks Peninsula is exempt from complying with f. sub-clause a. under table 1 (minimum net site area- residential zones). |
| <b>Chapter 9 Natural and Cultural Heritage</b>  |                |  |  |
| 9.3.2 Objectives and Policies   | Oppose in part | Rāpaki Rūnanga seeks certainty that the introduction of additional historic heritage provisions will not result in additional development constraints on properties  | Provide an additional provision (e.g., policy) to support the exclusion of properties located in the Papa Kainga/ Kāinga Nohoanga Zone on land which is held as Māori Land.  |

<sup>1</sup> Note- a change to the definition for Māori Land in the Plan is set out below.

|   |         |   |  |
|---|---------|---|--|
| 9.3.3 How to interpret and apply the rules.   | Oppose  | located in the Papakainga/Kāinga Nohoanga Zone, particularly on land which is held as Māori land.   | To avoid any uncertainty an additional clause is requested, stating that:<br><br><i>X. the rules in sub chapter 9.3 do not apply to any activity undertaken within a Papakāinga/Kāinga Nohoanga Zone on land which is held as Māori land</i> |
| 9.3.4.1.3 Restricted Discretionary activities |         |   |  |
| RD6 (a) (i) & (ii)                            | Oppose  | Rāpaki Rūnanga is concerned that this rule will further restrict their development aspirations on their whenua, noting that any new building or alterations to existing building (exterior façade), as well as fences and walls exceeding 1.5m in height is likely to require resource consent. | Provide an additional exclusion clause, whereby land which is held as Māori Land, that is in the Lyttelton Residential Heritage Area (RHA) and zoned Residential Banks Peninsula is exempt from complying with this rule.                    |
| 14.8 Rules- Residential Banks Peninsula Zone  |         |   |  |
| 14.8.2 Built form standards                   |         |   |  |
| 14.8.2.5 Recession Planes- a.                 | Support | Rāpaki Rūnanga is supportive of the exclusion that is proposed for heritage areas in Lyttelton and seeks a similar exclusion for its sites in the residential zone.   | Provide an additional exclusion clause for whereby land which is held as Māori Land is also excluded from complying with this rule.  |

| 14.8.3.2 Area-specific built form standards                       |        |  |   |
|---|--------|--|---|
| 14.8.3.2.2 site density- a. and b.                                | Oppose | Rāpaki Rūnanga is concerned that imposing further built form standards in relation to properties located in the Residential Heritage Area and the Character Area Overlay is overly restrictive on development in its takiwā. | Provide an additional exclusion clause, whereby land which is held as Māori Land and that is in the Lyttelton Residential Heritage Area (RHA) and/or the Lyttelton Character Area Overlay is exempt from complying with these area specific built form standards. |
| 14.8.3.2.3 Building height- a.                                    | Oppose |  |   |
| 14.8.3.2.4 Site coverage- a. and b.                               | Oppose |  |   |
| 14.8.3.2.5 Minimum building setbacks from internal boundaries- a. | Oppose |  |   |
| 14.8.3.2.6 Minimum building setbacks from road boundaries-a.      | Oppose |  |   |
| 14.8.3.2.9 Outdoor living space per unit-b.                       | Oppose |  |   |

| Plan Change 14 (Residential)-specific provisions |                         |  |  |
|--|-------------------------|--|--|
| Provision  | Support<br>or<br>oppose | Reasons  | Decision sought  |
| <b>Chapter 2 Abbreviations and Definitions</b>   |                         |  |  |
| Māori Land                                       | Support in part         | Further enable Rāpaki Rūnanga development priorities in terms of | Amend definition to enable definition to be applied in relation to |

|   |                |  |  |
|---|----------------|--|--|
|   |                | providing papakainga housing in the Residential Banks Peninsula Zone.  | chapter 14.8 Residential Banks Peninsula Zone.   |
| <b>Chapter 3- Strategic Directions</b>                        |                |  |  |
| Objective 3.3.3- Ngāi Tahu mana whenua                        | Support        | Rāpaki Rūnanga is specifically supportive of the proposed revisions to the high-level provision that seek to further enable Ngāi Tahu development priorities including provision of papakainga/ kāinga nohoanga within the urban area and on Māori Land. | Retain provisions  |
| Objective 3.3.4- Housing bottom lines                         |                |  |  |
| Objective 3.3.7- well functioning urban environment           |                |  |  |
| <b>Chapter 14- Residential</b>                                |                |  |  |
| 14.2 Objectives and Policies                                  |                |  |  |
| 14.2.1.1 Policy - Housing distribution and density-vii.       | Oppose in part | Sub-clause vii of this provision does not appear to recognise the needs of Ngāi Tahu whānui in considering housing distribution and density in Banks Peninsula.  | Recognise and enable the housing needs of Ngāi Tahu whānui to be met in Banks Peninsula. |
| 14.2.1.42 Policy - Residential development in Banks Peninsula | Oppose in part | Rāpaki Rūnanga seeks certainty that the needs of its whanau are not unnecessarily constrained by this policy.  |  |
| 14.2.1.3 Policy Needs of Ngāi Tahu whānui                     | Support        | Rāpaki Rūnanga is supportive of this policy as it seeks to enable the housing needs of Ngāi Tahu whānui to be met throughout residential   | Retain   |



|  |                |  |  |
|--|----------------|--|--|
|  |                | areas and in other locations (where there is an ongoing relationship with ancestral land). It is also noted that this policy implements Objective 14.2.2.  |  |
| 14.2.2 Objective - Short term residential recovery needs- a.   | Support        | Rāpaki Rūnanga is supportive of this objective as sub-clause a provides opportunities for an increased housing supply throughout lower to medium density residential areas and as noted above, Policy 14.2.1.3 implements this provision.  | Retain   |
| 14.2.45.8 Policy - Character of residential development in Banks Peninsula                                   | Oppose in part | Whilst Rāpaki Rūnanga acknowledges this provision in part seeks to improve (where practicable) connections to mahinga kai areas and recognise sites of Ngāi Tahu Cultural Significance, Rāpaki Rūnanga also has development aspirations for its whenua within Banks Peninsula which is not considered in this provision. | Provide an additional clause which enables Ngāi Tahu whānui to provide for their housing needs in residential areas. |
| <b>Rule 14.8.1.1. Permitted activities</b>   |                |  |  |
| P1 Residential activity, except for residential units containing more than six bedrooms and boarding houses. | Oppose in part | The existing rule does not recognise or enable papakainga housing within urban areas of Banks Peninsula.   | Amend rule to enable papakainga housing within the residential   |

|   |                 |   |   |
|---|-----------------|---|---|
|   |                 |   | zone as a permitted activity.   |
| <b>Rule 14.8.1.3 Restricted discretionary activities</b>      |                 |   |   |
| RD10 Multi-unit residential complexes                         | Opposes in part | Rāpaki Rūnanga notes that papakainga housing undertaken on its whenua (e.g., providing multiple residential units on a shared site for hapū members) could be deemed a multi-unit residential complex and as such, seeks certainty that this would not be the case. | Add an advice note confirming that this rule does not include papakainga housing. |
| <b>Matters of discretion</b>                                  |                 |   |   |
| <b>Chapter 15 Commercial</b>                                  |                 |   |   |
| 15.2 Objectives and Policies                                  |                 |   |   |
| 15.2.2.5 Policy- Banks Peninsula Commercial centres- a.       | Support in part | Whilst this policy seeks to provide for a range of activities and services in commercial centres including Lyttelton, Rāpaki Rūnanga seeks certainty that that this includes recognition of Ngāi Tahu whānui development aspirations within its takiwā.             | Recognise Ngāi Tahu whānui development aspirations in Banks Peninsula.            |
| 15.2.4.4 Policy- Recognition of Ngāi Tahu/ mana whenua values | Support         | Rāpaki rūnanga supports the intent of the policy  | Retain.   |



## Form 5

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

Clause 6 of Schedule 1, Resource Management Act 1991

10<sup>th</sup> May 2023

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

Submission lodged by email: [engagement@ccc.govt.nz](mailto:engagement@ccc.govt.nz)

**Name of submitters:** Te Hapū o Ngāti Wheke (Rāpaki) Rūnanga (referred to below as **Rāpaki Rūnanga**)

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1. Rāpaki Rūnanga **could not** gain an advantage in trade competition through this submission.
2. Rāpaki Rūnanga does **wish** to be heard in support of this submission at a hearing.
3. If others make a similar submission, we **will** consider presenting a joint case with them.

### 1. Te Hapu o Ngāti Wheke Rāpaki Rūnanga

- 1.1 Centuries before Columbus voyaged to the Americas, Tamatea-Pokai-Whenua was exploring Aotearoa. On his trip back north from Murihiku, he stopped off in the hills above Te Rāpaki o Te Rakiwhakaputa. But a southerly storm struck. His party's fire sticks had gone out, so Tamatea recited the necessary karakia and called to his atua at Ruapehu, Tongariro and Ngauruhoe to send him fire. This they did and though some fell to the ground at Te Whakatakanga-o-te-ngarahu-o-te-ahi-o-Tamatea (Hanmer Springs), it eventually arrived, and the evidence can still be seen today at Te Ahi a Tamatea. 1,000 years later Pakeha call that same hill Rāpaki Rock. Nearby, the distinctive cone-shaped hill which dominates Rāpaki is Te Poho o Tamatea.
- 1.2 About the beginning of the 18<sup>th</sup> century, Te Rakiwhakaputa, a Ngāi Tahu rangatira toa of Kāti Kuri descent, came up the harbour Whakaraupō – so named by Tamatea after the raupō which was then growing at the head of the harbour.

- 1.3 The Kāti Kuri / Ngāi Tahu war party fought and defeated the resident manawhenua Ngāti Mamoe at Ōhinehou (now Lyttelton). That battle was marked by naming the hills above Ōhinehou, Ōkete-upoko, a name which was still used in 1849 with the signing of the Port Cooper Deed when Ngāi Tahu sold most of the Whakaraupō catchment to the British Crown. Another major battle between Ngāi Tahu and Ngāti Mamoe was at Ōhinetahi, a pā site on the low ridge near the sea to the south of current Governor's Bay.
- 1.4 The traditional story is that Te Rakiwhakaputa confirmed his take raupatu by casting his rāpaki (waist mat) on the beach and the kaika has ever since been known as Te Rāpaki o Te Rakiwhakaputa. He also more strategically ensured his descendants' manawhenua rights to this takiwā by marrying Hine-te-a-Wheka who had Ngāti Mamoe whakapapa.
- 1.5 Once the main fighting in Whakaraupō was done Te Rakiwhakaputa moved on, but to ensure ahi kaa he left his son Manuwhiri who built Te Pa Whakataka (near the current tennis courts in Governors Bay). Another son Wheke settled at Rāpaki and the hapū there has become known as Ngāti Wheke and are manawhenua of Whakaraupō and some adjacent areas. Wheke's name is also marked by the hill above Cass Bay known as Te Moenga-a-Wheke, or The Great Tor. Wheke maintained a pā at Ōpawaho near where the rail and road cross the Ōpawaho. Ngāti Wheke regard the Ōpawaho as the northern edge of the hapū takiwā.
- 1.6 On 10 August 1849 the Whakaraupō/ Port Cooper Deed was signed by Walter Mantell and 18 Ngāi Tahu. For £200 the Crown received 65,000 acres and left Ngāti Wheke with 850 acres at Rāpaki as Native Reserve 875. A Census in 1857 listed 48 Ngāi Tahu living at Rāpaki, 12 in Taukahara and 12 in Pūrau. 50 years later only the Rāpaki kaika remained.
- 1.7 Community buildings built in Rāpaki were: 1869 the Wesleyan Church; 1874 Catholic Church; 1878 Māori School, 1901 Rūnanga hall and in 1916 the jetty and war memorial 'Gallipoli'. The school ceased functioning as a school in 1946. The school still stands butt the Catholic Church which was demolished about 1950. The hall was replaced with a new Whare Tipuna in 2011. This is a whare whakairo and the carvings, inside and out, represent the whakapapa of Rāpaki and the mana whenua who live there.

### ***Te Hapū o Ngāti Wheke (Rāpaki)***

- 1.8 Te Hapū o Ngāti Wheke (Rāpaki) is the modern-day representative of the hapū Ngāti Wheke. The takiwā of the Rūnanga reflects the events and deeds of Te Rakiwhakaputa and his sons Manuwhiri and Wheke; events and deeds that secured their descendants' manawhenua rights to the area. The takiwā centres on Rāpaki and the catchment of Whakaraupō and is described in the Port Cooper Deed of 1849 (English translation):

*“The inland boundary commences at the mouth of the Opawa thence along [the Halswell River] to Waihora; the outer boundary commences at Kaitara [Port Levy], thence by Te Pohue [Monument], thence by the Ahupatiki [Mt Herbert] ridge to Waihora following the line of the said mountain to Kuhakawariwari.”*

- 1.9 The Rāpaki Takiwā is further defined in Te Rūnanga o Ngāi Tahu (Declaration of Membership) Order 2001. Rāpaki Rūnanga have the responsibility to act as kaitiaki over these lands and are active in the environmental management of their takiwā. A map of the takiwā (and as covered by the Mahaanui Iwi Management Plan) is contained in **Appendix One**.

## 2. Introduction

- 2.1 This submission is made on behalf of Te Hapū o Ngāti Wheke Rāpaki Rūnanga (referred to as **Rāpaki Rūnanga**) on Plan Change 13 and Plan Change 14 to the Christchurch District Council.
- 2.2 Rāpaki Rūnanga acknowledges the engagement Christchurch City Council has had with Mahaanui Kurataiao (on behalf of papatipu rūnanga) during the preparation of the proposed plan changes. It is noted there was a principal focus on Strategic Directions (Chapter 3 of the District Plan), and qualifying matters regarding papakainga/ kāinga nohoanga, with agreement to take a collaborative approach to advance a separate plan change in the future to enable additional papakainga/ kāinga nohoanga within the Christchurch District and surrounds. As such, this submission does not seek to undermine those discussions and instead focuses on the Rāpaki Rūnanga takiwā to ensure the natural resources (primarily within the Lyttelton catchment) are managed in accordance with Rāpaki Rūnanga values.

## 3 Ngāi Tahu Values

- 3.2 As set out in the Mahaanui Iwi Management Plan 2013, there are a number of key values, principles and practices that shape Ngāi Tahu views on the environment and resource management. Rāpaki Rūnanga identifies the following values in relation to the proposed plan provisions:

### *Manawhenua*

- Manawhenua is the right to exercise authority over a particular area, its resources and its people. Manawhenua is passed on by way of whakapapa and is protected and secured through the on-going exercise of one's rights to resources in a manner consistent with tikanga. As noted above, Rāpaki Rūnanga represents the interests of Ngāti Wheke who have kaitiaki and manawhenua interests in the Rāpaki and the Whakaraupō catchment.

### *Kaitiakitanga*

- Kaitiakitanga is fundamental to the relationship of Ngāi Tahu and the environment. The responsibility of kaitiakitanga is twofold: first, there is the ultimate aim of protecting mauri and, second, there is the duty to pass the environment to future generations in a state which is as good as, or better than, the current state. To Rāpaki Rūnanga, kaitiakitanga is not a passive custodianship, nor is it simply the exercise of traditional property rights but entails an active exercise of responsibility in a manner beneficial to the resource.
- Ngāi Tahu whānui are both users of natural resources, and stewards of those resources. At all times, Ngāi Tahu is guided by the tribal whakataukī: “mō tātou, ā, mō kā uri ā muri ake nei” (for us and our descendants after us).

### *Whanaungatanga*

- Rāpaki Rūnanga has a responsibility to promote the wellbeing of the tangata whenua of Ngāti Wheke and ensure that the management of its assets and the wider management of its natural resources to support the development of hapū members.

## **4 Relief sought- General**

- 4.2 Rāpaki Rūnanga **supports** the plan provisions except where we ask for specific amendments or additions as set out in **Schedule One** attached.
- 4.3 This submission has been drafted as a whole, with interlinking submission points. While a submission point may have been made against one provision consequential changes will be required to other related provisions within the plan to ensure consistency across the plan and to address the concerns raised.

## **5 Reasons- General:**

- 5.2 The amendments and additions sought to these plan changes by Rāpaki Rūnanga are to better incorporate the broader interests and aspirations of Rāpaki Rūnanga in its takiwā within the Christchurch District. The submitter considers these changes are necessary to:
- Better achieve the purpose of the of the Resource Management Act 1991 (**RMA**), including matters under s6, having particular regard to kaitiakitanga as required under s7(a) of the RMA, and taking into account the principles of the Treaty as required under s8 of the Act;
  - Take into account the relevant iwi management plan namely:
    - Mahaanui Iwi Management Plan 2013
 As required under s74(2A) of the RMA; and

- Consequently, discharge the councils' duties under s32 of the RMA.
- 5.3 These reasons apply to every decision requested in this submission, along with any additional reasons listed under each submission point in **Schedule 1**.
- 5.4 **Decisions sought:**
- 5.5 The specific decisions sought on Plan Changes 13 and 14 are listed in **Schedule 1**.



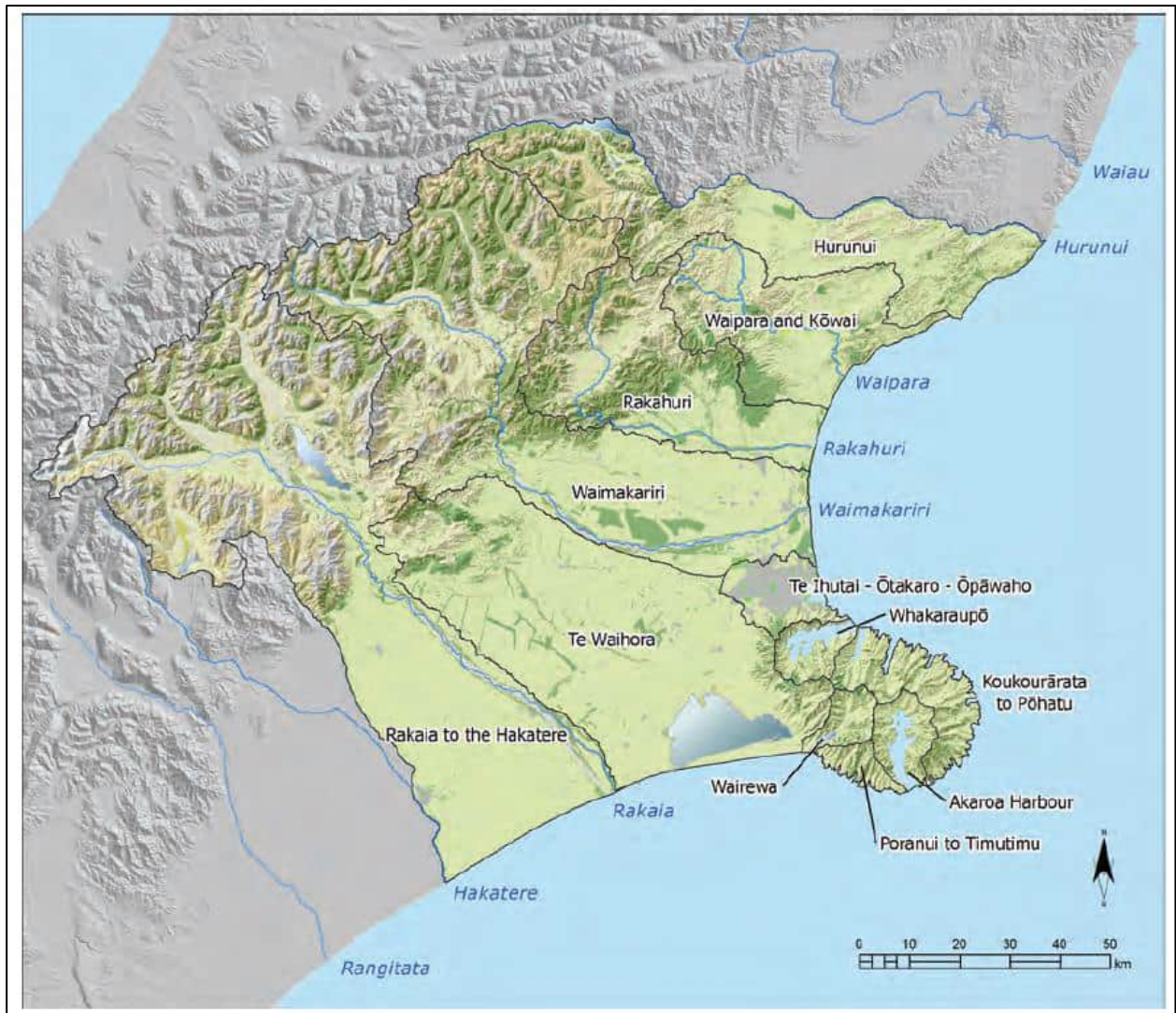
Mishele Radford  
Chairman  
Te Hapū o Ngāti Wheke Inc (Rāpaki Rūnanga)

**Address for service:**

Amy Beran  
Senior Environmental Advisor - Planning  
Te Rūnanga o Ngāi Tahu  
PO Box 13 046  
Christchurch 8021

**Email:** [amy.beran@ngaitahu.iwi.nz](mailto:amy.beran@ngaitahu.iwi.nz)

**APPENDIX One: Ngā Pākihi Whakatekateka o Waitaha and Te Pātaka o Rākaihutū- the takiwā covered by the Mahaanui IMP 2013**





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

## Submitter Details

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

**First name:** Terence **Last name:** Sissons

**Preferred method of contact** Email

**Postal address:** 121 Merivale Lane

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**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8014

**Email:** terrysissons@me.com

**Daytime Phone:** 027 223 8888

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:** 96.1

- Support
- Oppose
- Seek Amendment

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

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

Limit the HDRZ to the central city area and provide for MDRZs around the suburban shopping centres

Provide for 3 level dwellings as of right in MDRZs.

Require independent geo-tech advice as a precondition to any development over 10 metres.

Delete the waiver of QM re sunlight access for buildings over 12m.

**My submission is that**

The projected population growth of about 50,000 between now and 2048 (389,200 to 448,000) should not require 40,000 additional homes as advised in the consultation document.

According to the Council's LT Plan, on average, there are 2.5 people per household, which suggests that only 20,000 additional dwellings will be required.

If the council limited the HDRZ to the central city area and provided for MDRZs around the suburban shopping centres it should easily satisfy the need for additional housing.

The NPS-UD contemplates 3 level dwellings in MDRZs which is what the council should adopt instead of 4 levels.

Following the 2011/12 earthquakes the city resolved to limit redevelopment to 3 levels, which became the norm for residential and commercial/office development in the city.

The risk of earthquake has not gone away and must surely be considered before any proposed changes are implemented.

According to the council's latest annual plan, by 2051, 24% of the population are expected to be over the age of 65 years and 10% of the population are expected to be over 80. This cohort is unlikely to be attracted to living in high-rise apartment blocks.

Much of the land within the proposed HDRZs is not suitable for intensive high-rise development. Independent geo-tech advice should be a precondition to any development over 10 metres.

I agree in principle with the council's sunlight access proposals but cannot understand the rationale for, nor agree with, the proposal that no QM re sunlight access applies to buildings over 12 m if set back 8 metres the boundary.

A building that is 30 metres high will have a significant impact on the neighbour's access to sunlight and should not be allowed in residential areas.

---

**Attached Documents**

| File                   |
|------------------------|
| No records to display. |

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

## Submitter Details

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

**First name:** Kate **Last name:** Askew

**Preferred method of contact** Email

**Postal address:** 11 Shelley Street

**Suburb:** Sydenham

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8023

**Email:** askewsme@yahoo.com

**Daytime Phone:** 03 9600965 home or

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:** 97.1

- 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 changes identified above with respect to the boundary between the Shelley Street/Forbes Street Residential Heritage Area and the adjoining Commercial Local Centre (Small) zone to the east.

**My submission is that**

I seek changes to Rule 15.5.2.4 relating to building setback from a Residential zone.

I seek amendments to this rule so that a new clause b is added requiring a 5m setback from the internal boundary with a Residential Heritage Area.

I consider that a greater setback is necessary to buffer residents living in the Shelley Street/Forbes Street Heritage Area, from permitted activities (i.e., food and beverage outlets, trade suppliers, supermarkets, gymnasiums etc.) provided for in the adjoining Local Centre (Small) zone to the east. This buffer is necessary due to their being a much lower 5m max height and scale of buildings existing and permitted in the Shelley Street/Forbes Street heritage area, and the importance this heritage area has with respect to the City's history. A greater buffer is required to protect the amenity of persons living in the heritage area.

The second change I request is to Ruyle 15.5.2.7, where I consider a new clause needs to be added stating:

A landscape strip with a minimum width of 3m shall be planted along all boundaries with a residential heritage area and shall include trees that will grow to a minimum height of 6 to 8 metres.

I consider a landscape buffer of this depth is necessary to protect the amenity of occupants living on the east side of Shelley Street, noting that second residential units are provided for behind the existing dwellings under Rules 14.5.3.2.7.

---

#### Attached Documents

| File |
|------|
|------|

No records to display.

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

## Submitter Details

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

**First name:** Ann-Mary & Andrew **Last name:** Benton

**Preferred method of contact** Email

**Postal address:** 34 Rugby Street

**Suburb:** Merivale

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8014

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

**Daytime Phone:** 021 574 235

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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.

Additional requirements for hearing:

We are happy to be part of a combined presentation with others seeking a similar outcome.

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 98.1

- 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 see the decisions I seek in my submission on the Residential Chapter.

**My submission is that**

Please see my submission on the Residential Chapter.

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

**Points:** 98.2

- Support
- Oppose
- Seek Amendment

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

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

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

**My submission is that**

We are extremely concerned by the impact of the proposed rezoning to High Density Residential, on the character and coherence of the neighbourhood at Helmores Lane, specifically the area consisting of Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) (**the Area**).andnbsp; Owners and occupiers of these properties, ourselves included, have come to this Area to enjoy the amenity that the neighbourhood offers and have invested heavily in securing their properties.andnbsp; These property owners highly value the existing environment and the benefits it provides in terms of pleasantness and lifestyle.andnbsp; Previously, that character had been acknowledged by the identification of the area as a special amenity area (SAM8).

andnbsp;

It is accepted that the Area has been subject to some residential re-development over the years, especially since the Canterbury earthquakes, nevertheless it has retained a sense of character and coherence that, we consider, is somewhat unique. It has a relationship to the Avon River and to the parklands beyond, which are part of, and provide a link to the rest of, Hagley Park.andnbsp; It has remained an enclave of relatively spacious residential dwellings that has also enabled the retention of many trees (including significant specimen trees) both within the streetscape and within private properties, including our own.

andnbsp;

There are also heritage items within the Area that have been identified in the proposals for PC14.andnbsp; These items, including some of the surviving older residences, are an important part of the overall character of the Area. Changing the area around these items would

remove their context and impact on their heritage setting.

andnbsp;

The inclusion of this area as a High-Density Residential zone threatens to destroy this character and the coherence it provides.andnbsp;  
This is not simply a question of land values.andnbsp;  
There is much to be valued in living in an area with its own character and a sense of coherence that we seek to preserve.

andnbsp;

Some might say that the change in zoning does not impact on this situation as the coherence will be maintained by existing landowners.andnbsp;  
This is arguable at best and in the case of the Area, overlooks that the changed zoning would itself change the equation for landowners and, more importantly those who might succeed them.andnbsp;  
The character of the Area is, in part, based on the longevity of ownership, which naturally means that changes in ownership can happen because of succession amongst other reasons.andnbsp;  
Newer owners, less invested in the character of the Area, would be free to take advantage of high-density status and, what is feared is a domino effect once the character that makes the Area so valuable to many, begins to be lost.

andnbsp;

In addition, we note that there may also be further constraints to High (or even Medium) Density development in the area, which is identified as TC3 land and much of which is also in the Council's own Flood Plain overlay.andnbsp;  
That is not to mention potential parking issues that would likely be created if there was a proliferation of High Density accommodation.

andnbsp;

We acknowledge that this may not be the only area in Christchurch that holds these fears.andnbsp;  
We are firmly of the view that such views should not be unnecessarily discounted, where they can be justified.

andnbsp;

Within the framework that the Council has chosen to give effect to the new Medium Density Residential standards and the National Policy Statement on Urban Development, we consider that there is the ability to protect what is special about this area by:

andnbsp;

- Rezoning the area Medium Density, and identifying the Area as a Residential Character Overlay Area, with the applicable rules (as attached): or

andnbsp;

- Rezoning the area Medium Density and imposing a further change to the qualifying matter allowing access to sunlight by making the recession plane 45°, rather than 50°, from 3m at southern boundaries: and/or

andnbsp;

- Providing that southern boundary neighbours can be notified if resource consents for height or access to sunlight non-compliances.

andnbsp;

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

---

#### Attached Documents

| File  |
|---|
| PC14 Helmores Lane - proposed RCOverlay rules |

## PC14 – RESIDENTIAL CHARACTER OVERLAY RULES (PROPOSED)

### CCC Summary of Proposed Changes

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

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

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

### Proposed Rules (Medium Density Residential Zone)

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



|                          |  |                           |
|--------------------------|--|---------------------------|
| Restricted Discretionary | <p>Within a Character Area Overlay:</p> <p>a. The demolition or removal of a building greater than 30m<sup>2</sup> on the site, relocation of a building onto the site, erection of new buildings and alterations or additions to existing buildings, accessory buildings, fences and walls associated with that development.</p> <p>b. This rule does not apply:</p> <p>i. where 14.5.3.1.2 C1 applies.</p> <p>ii. to fences that meet the applicable built form standard 14.5.3.2.12 for that Character Area;</p> <p>iii. to accessory buildings that are less than 30m<sup>2</sup> and located to the rear of the main residential unit on the site and are less than 5 metres in height; iv. to fences that are located on a side or rear boundary of the site, except where that boundary is adjacent to a public space.</p> <p>c. Activities that do not meet Built Form standard 14.5.3.2.6. d. Any application arising from this rule shall not be limited or publicly notified.</p> |                           |
|                          | Building height controls (dependent on the area, but the current Character Areas have 7m and 5.5 height limits proposed)   | In most places, 11 metres |
|                          | <p>Character Areas have a range of other special limits on built form, dependent on the values of that particular Character Area, including:</p> <ul style="list-style-type: none"> <li>- the width of building frontages</li> <li>- landscaping</li> <li>- setbacks (larger than typical)</li> <li>- building coverage</li> <li>- outdoor living space requirements</li> <li>- minimum glazing facing the street</li> <li>- fencing</li> <li>- garaging and car ports</li> <li>- building separation</li> </ul> <p>Generally the built form requirements are stricter than the underlying zoning would otherwise allow.</p>   |                           |

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

### Proposed Subdivision Rules

|  | <b>Activity within a Character Area Overlay</b>   | <b>Activity if not in a Character Area Overlay</b>  |
|--|---|---|
|  | <p>Minimum net site area for subdivision varies between Character Areas in the Medium Density Zone, but is generally larger than the underlying Zone requirement.</p> <p>In High Density Zone – 400m<sup>2</sup>.</p> | <p>400m<sup>2</sup> proposed for the Medium Density Residential Zone or<br/>300m<sup>2</sup> proposed for the High Density Residential Zone</p> |

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

## Submitter Details

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

**First name:** Catherine **Last name:** Boulton

**Organisation:** Yes I have authority

**Preferred method of contact** Email

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** catherine@planzconsultants.co.nz

**Daytime Phone:** 021 964 017

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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**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:

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 99.1

- 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 see attached submission.

**My submission is that**

Please see attached submission.

**Original Submitter:**

**Original Point:**

**Points:** 99.2

- Support  
 Oppose  
 Seek Amendment

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

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

Please see attached submission.

**My submission is that**

Please see attached submission.

**Original Submitter:**

**Original Point:**

**Points:** 99.3

- 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*

Please see attached submission.

**My submission is that**

Please see attached submission.

Attached Documents

| File  |
|---|
| Plan Change 13 and 14 Christs College Canterbury Submission (Final) |

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

## Submitter Details

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

**First name:** Catherine **Last name:** Boulton

**Preferred method of contact** Email

**Postal address:** PO Box 1845

**Suburb:**

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8140

**Email:** catherine@planzconsultants.co.nz

**Daytime Phone:** 021 964 017

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:

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

## Consultation Document Submissions

**Original Submitter:**

**Original Point:**

**Points:** 99.4

- 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***

Please see full attached submission.

**My submission is that**

Please see full attached submission.

**Original Submitter:****Original Point:****Points:** 99.5

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- Seek Amendment

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Please see full attached submission.

**Original Submitter:****Original Point:****Points:** 99.6

- Support
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## Attached Documents

| File  |
|---|
| Plan Change 13 and 14 Christs College Canterbury Submission (Final) |

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

**CLAUSE 6 OF SCHEDULE 1 AND VIA INTENSIFICATION PLANNING INSTRUMENT (IPI) IN ACCORDANCE WITH SECTION 80F(1)(a), RESOURCE MANAGEMENT ACT 1991**

**Submission on Plan Changes 13 and 14 to the Christchurch District Plan (PC13 and PC14)**

**To:** Christchurch City Council  
53 Hereford Street  
Christchurch Central  
Christchurch 8013  
<https://ccc.govt.nz/the-council/haveyoursay/show/531>

**Submitter:** Christ's College Canterbury (**Christ's College**)

**Contact:** Rob McFarlane

**Address for Service:** Christ's College Canterbury  
C/- Planz Consultants Limited  
PO Box 1845  
Christchurch 8140

Attn: Catherine Boulton  
M +64 21 964 017  
E [catherine@planzconsultants.co.nz](mailto:catherine@planzconsultants.co.nz)

**Hearing**

Christ's College wishes to be heard in support of this submission.

**Introduction**

1. This is a submission on the Christchurch District Council (the Council's) Proposed Plan Change 13 and 14 (PC13 and PC14) to the Christchurch District Plan. It is noted that there is ambiguity between the notified Plan Changes (with some changes notified under both Plan Change 13 and 14). Therefore, Christ's request that all raised submission points are considered across both Plan Changes.
2. Christ's College could not gain an advantage in trade competition through this submission.

3. Christ's College is generally supportive of Plan Change 13 in respect of the identification and management of historic heritage and the use of qualifying matters for individually listed heritage items – noting that historic heritage is a matter of national significance in Section 6.
4. However, Christ's College oppose the Residential Heritage Area Qualifying Matter being applied to their land on the eastern side of Rolleston Avenue. This is land that falls outside of the College's main campus.
5. Christ's College also oppose the zoning of 21 Gloucester Street as Medium Density Residential Zone and seek that this is rezoned as Specific Purpose (Schools) Zone to match the zoning of the rest of their adjoining land.

### Background

6. Christ's College is the only independent boarding and day school for boys in the South Island. The school was established as part of the original Anglican foundation of Christchurch. It first opened at the start of 1851 in the Lyttelton Immigration Barracks before moving to the St Michael's parsonage in Oxford Terrace and then on to its present site at the main campus in 185+6. The school's location (next to Hagley Park) provided the college with room to expand and the school gradually began to acquire additional buildings so that now the school and its associated buildings are located on either side of Rolleston Avenue. The main school campus on the western side of Rolleston Avenue is unique with its combination of heritage listed items and their settings alongside state of the art modern learning spaces, sports building and fields, arts facilities and houses for boarders and dayboys. This land falls within the Specific Purpose (School) Zone under the Operative District Plan.



**Figure 1: Aerial Image of Christ's College Land (Identified in Red) to the West of Rolleston Avenue (Source: Canterbury Maps)**



7. Christ's College also owns land to the east of Rolleston Avenue, located on the block between Armagh Street to the north and Gloucester Street to the South, and on the south-western side of Gloucester Street. This land is currently occupied by houses for dayboys and boarders and other buildings associated with the educational, administrative and boarding functions of the school. There are two heritage listed items within this block, Rolleston House at 2 Gloucester Street which has a Historic Place Category 2 listing and is used as a Christ's College dayboy house. The other is the dwelling at 64 Rolleston Avenue, this is listed as being 'Significant' in the Christchurch District Plan but not on the Heritage New Zealand List, this building is used by the school for administrative purposes. This land is predominantly zoned Specific Purpose (School) Zone except for 21 Gloucester Street which was acquired by College in February 2019 for strategic purposes to align and straighten the land owned in this block and is zoned Residential Central City Zone under the Operative District Plan and Medium Density Residential Zone under Plan Changes 13 and 14. It is across this block of Christ's College land on the eastern side of Rolleston Avenue where future development to accommodate improved facilities and future roll growth at the school is likely to be directed given the significant development constraints at the main campus caused through the combination of heritage buildings/ settings and waterway setbacks.
8. On this land to the east of Rolleston Avenue, Christ's College have obtained a Certificate of Compliance (RMA/2022/3077) for the demolition of the existing buildings on the site to ground level (excluding the heritage listed building at 2 and 64 Rolleston Ave). This certificate of compliance lapses on 6 October 2027. This certificate of compliance was for:

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### **Plan Change 13 – Heritage Plan Change**

Christ's College opposes the following:

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- Christ's College **opposes** the proposed addition of the 'Proposed Residential Heritage Area' Qualifying Matter Overlay (HA6) to the Planning Map Enlargement H1 referred to on the Central City Planning Map. Note that this Planning Map Enlargement is not included in the bundle of maps notified.
- Christ's College **opposes** the proposed amendments to 9.3.2.2.8 Policy – Demolition of heritage items as these changes subject buildings in heritage areas to the same policy tests as listed items.

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

Christ's College opposes and supports the following:

- Christ's College **opposes** the zoning of their land at 21 Gloucester Street as Medium Density Residential Zone on the Central City Zoning, Other Notations, Designations and Heritage

Orders Planning Map. Christ's College **supports** the zoning of their land at 21 Gloucester Street as Specific Purpose (Schools) Zone with the alternate zoning of High Density Residential Zone.

- Christ's College **supports** the alternate zoning of their land which falls within the Specific Purpose (Schools) Zone on the eastern side of Rolleston Avenue as High Density Residential Zone as set out in Sub-chapter 13.6 SP School Appendix 13.6.6.3.
- As above, Christ's College **opposes** the proposed amendments to 9.3.2.2.8 Policy – Demolition of heritage items as these changes subject buildings in heritage areas to the same policy tests as listed items.

Reasons for Christ's College opposition:

The College is very aware of their responsibility as stewards for the extensive collection of significant heritage buildings located across the main campus west of Rolleston Avenue. Since the earthquakes the College has invested tens of millions of dollars in the sensitive repair and strengthening of a number of these buildings to ensure their ongoing ability to deliver functional educational spaces.

In addition to being stewards of their built heritage, the College is also very aware of their responsibility to provide modern, functional learning spaces that reflect modern teaching requirements and that provide warm, safe residential accommodation for boarders. Because of the heavily constrained nature of the main campus through heritage and waterway setback rules, the primary area for future expansion and provision of modern educational spaces lies on the eastern side of Rolleston Avenue. With the exception of 21 Gloucester Street, all of the College's landholdings have a Specific Purpose (Schools) zoning, commensurate with the use of this land for educational purposes. The ability to maintain the Historic Campus west of Rolleston Avenue is inextricably linked to the strategic landholding on the eastern side of Rolleston Avenue for school related functions.

The imposition of the proposed Heritage Conservation Area, and the associated ambiguity in the alternative zoning and associated built form standards, runs directly counter to the ability of this land to deliver a functional educational environment. School buildings have a different function and form to cottages and small dwellings, with their built form inevitably reflecting their internal function. As such it is simply not plausible for large educational buildings to be designed in a manner that is comparable to a series of small detached Victorian dwellings. The eastern block is located within the city centre of the largest city in the South Island. As such larger buildings are entirely appropriate within the wider context of the College's CDB location.

Since recovering from the earthquake sequence, the College has experienced consistent roll growth such that the school currently has a roll of some 710 students with a strategy to grow to approximately

750 students over the coming years. Christ's College therefore opposes further planning constraints which will inhibit their development and growth for education activities across this land.

The College's landholdings on the eastern side of Rolleston Avenue are comprised of an eclectic mix of building ages and designs. The majority of the structures are post-1940s and/or are vacant sites and therefore the heritage values of the College's landholdings are a) limited, and b) interspersed with numerous more modern buildings or vacant lots such that there is little cohesion or uniformity on building age.

Christ's College opposes the inclusion of their land within the 'Proposed Residential Heritage Area' (HA6) as identified on the Central City Planning Map notified under PC13 and the Planning Map Enlargement H1 (which was not notified). Christ's College's land is not zoned as a '*residential area*', rather, their land across both sides of Rolleston Avenue is predominantly zoned Specific Purpose (School) Zone. School Zones appropriately apply to the vast majority of public, state-integrated, and private schools throughout the district. The zone seeks to enable education providers to efficiently use and develop their land and buildings for education activities (which include land and/or buildings for regular instruction or training but also offices and boarding and residential accommodation). The land on the eastern side of Rolleston Avenue is currently and appropriately being used for 'education' purposes with the land and buildings being used for school administration, dayboy houses and boarders accommodation and staff/housemasters accommodation. Having a Residential Heritage Area overlay over Christ's College land is therefore misaligned with the underlying zoning of the land and its existing use for education activities.

Christ's College, as mentioned above, hold a Certificate of Compliance for all buildings across their land on the eastern side of Rolleston Avenue (excluding the two listed heritage items). This was sought to retain future flexibility to achieve College's Strategic Objectives. Christ's College can therefore demolish these buildings within the next few years (at any point up until October 2027) without needing to obtain a Resource Consent to do so. The buildings contribution to the heritage fabric, across this land as neutral, defining or contributory will be meaningless if these buildings are demolished.

PC14 introduces amendments to the Specific Purpose (School) Zone provisions under Sub-chapter 13.6 SP School. To start, PC14, at Appendix 13.6.6.3 has identified the 'alternate zone' for Christ's College on the land located at Rolleston Avenue, City and Montreal Street, City (former Girls High site sold by Christ's College in May 2021) as being 'High Density Residential Zone'. Christ's College supports this alternate High Density Residential Zoning. This alternative zoning applies when the land and buildings are no longer required for an education activity and are to be developed for other uses

consistent with the provisions applicable in the surrounding environment. The built form provisions (13.6.4.2) amended under Plan Change 14 also apply to educational activities. There is no reference to the Inner West Residential Heritage Area under Sub-chapter 13.6 SP School or under Sub-chapter 14.6 Rules – High Density Residential Zone, therefore the inclusion of the Heritage Area over this land is seen as being both redundant but also confusing.

Specific provisions relating to the Inner West Residential Heritage Area would apply on Christ's College's site at 21 Gloucester Street, which under PC14 is proposed to be zoned as the Medium Density Residential Zone. Christ's College would support the rezoning of this site to the Specific Purpose (School) Zone, this would square up the school zone with their land and enable the land and buildings to be used for education activities. Christ's College would also support the alternate zoning of this site as being High Density Residential Zone as it is for their adjoining land.

Amendments are introduced, altering the level of development that can be undertaken on these sites. Under PC14 - Sub-chapter 14.5 Rules – Medium Density Residential Zone, Rule 14.5.3.2.3 introduces a maximum height limit of 11m for buildings within the Inner City West Residential Heritage Area. This is the height limit that would apply to 21 Gloucester Street if it were to remain zoned as Medium Density Residential Zone as proposed under the Plan Change. As the remainder of Christ's College land is located within the Specific Purpose (Schools) Zone and its alternative zoning listed under Sub-chapter 13.6 SP School (Appendix 13.6.6.3) is High Density Residential Zone the maximum height limit introduced under PC14 Rule 13.6.4.2.5ii is 14m within 10m of an internal boundary, otherwise it is 32m. Christ's College is supportive of the height limits introduced under PC14 but submit that it is confusing having the heritage overlay (HA6) over Christ's College Specific Purpose (School) zoned land as on first look it would seem as though the height limit were more restrictive than the rules provide for.

Christ's College opposes the notified amendments to 9.3.2.2.8 Policy – Demolition of heritage items as it subjects buildings within a heritage area to the same stringent tests as listed heritage items which have met the significance threshold for scheduling in the District Plan. It is inappropriate that buildings located within a heritage area are subject to the same policy test as listed heritage items. In this regard it is considered that the Policy be revised as follows:

#### **9.3.2.2.8 Policy – Demolition of heritage items**

- a. When considering the appropriateness of the demolition of a heritage item scheduled in Appendix 9.3.7.2 ~~defining building or contributory building in a heritage area scheduled in Appendix 9.3.7.3~~, have regard to the following matters:

- i. whether there is a threat to life and/or property for which interim protection measures would not remove that threat;
- ii. whether the extent of the work required to retain and/or **repair the heritage item ~~or building~~** is of such a scale that the heritage values and integrity of the heritage item or building would be significantly compromised, **and the heritage item would no longer meet the criteria for scheduling in Policy 9.3.2.2.1;**
- iii. whether the costs to retain the **heritage item ~~or building~~** (particularly as a result of damage) would be unreasonable;
- iv. the ability to retain the overall **heritage values** and significance of the **heritage item ~~or building~~** through a reduced degree of **demolition**; and
- v. the level of significance of the **heritage item**.

### Relief Sought

The submitter requests the following amendments and decisions:

#### Plan Change 13 and 14

1. The Inner West Heritage Residential Area (HA6) Overlay **be deleted** across Christ's College and Crown land to the east of Rolleston Avenue (PC13 and PC14), specifically:
  - 6 Armagh Street – Part Section 361 Town of Christchurch
  - 14 Armagh Street – Lot 2 DP 52794
  - 16 Armagh Street – Lot 1 DP 5524
  - 20 Armagh Street – Section 355 Town of Christchurch
  - 22 Armagh Street – Section 353 Town of Christchurch
  - 2- 8 Gloucester Street - Lot 1 Deposited Plan 36171, Part Lot 21 Deposited Plan 1003 and Part Section 365, Part Section 367 and Part Section 369 Town of Christchurch
  - 7 Gloucester Street – Town Section 360 City of Christchurch
  - 9 Gloucester Street – Lot 1 DP 52794
  - 13 Gloucester Street – Lot 1 DP 4097
  - 14 Gloucester Street – Part Lot 21-22 DP 1003
  - 19 Gloucester Street – Town Section 354 City of Christchurch
  - 64 Rolleston Avenue – Section 362 Town of Christchurch
  - 72 Rolleston Avenue – Section 363 and Part Section 361 Town of Christchurch
2. The alternate zone listed in Appendix 13.6.6.3 for Christ's College **be retained** as High Density Residential zone (PC14).

3. **Amend** the Central City Planning Map to rezone 21 Gloucester Street to Specific Purpose (Schools) Zone (PC13 and 14).
4. **Reject** all notified changes to 9.3.2.2.8 Policy – Demolition of scheduled historic heritage (PC13 and PC14).

### **Overall Conclusion**

Christ's College's ability to maintain their Historic Campus west of Rolleston Avenue is dependent on Christ's College being able to utilise their total landholdings to achieve maximum opportunities and efficiencies. The land on the eastern side of Rolleston Avenue provides the potential to expand and/or enhance educational support and classroom facilities. In relation to the provisions and matters that Christ's College has raised concerns about, it is considered those require deletion, inclusion or amendment because without such, they:

- will not promote sustainable management of resources and will not achieve the purpose of the RMA;
- are contrary to Part 2 and other provisions of the RMA;
- will not enable the social and economic well-being of the community;
- will not meet the reasonably foreseeable needs of future generations;
- will not achieve integrated management of the effects of use, development or protection of land and associated resources of Christchurch City;
- will not enable the efficient use and development of the College's land and will not enable this land to be efficiently redeveloped to meet evolving educational needs; and
- do not represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions in relation to other means.

Christ's College could not gain an advantage in trade competition through this submission.

The suggested revisions do not limit the generality of the reasons for the submission.

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

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

**DATED** this 12th day of May 2023

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

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**Contact:** Rob McFarlane

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PO Box 1845  
Christchurch 8140

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#### **9.3.2.2.8 Policy – Demolition of heritage items**

- a. When considering the appropriateness of the demolition of a heritage item scheduled in Appendix 9.3.7.2 ~~defining building or contributory building in a heritage area scheduled in Appendix 9.3.7.3~~, have regard to the following matters:

- i. whether there is a threat to life and/or property for which interim protection measures would not remove that threat;
- ii. whether the extent of the work required to retain and/or **repair the heritage item ~~or building~~** is of such a scale that the heritage values and integrity of the heritage item or building would be significantly compromised, **and the heritage item would no longer meet the criteria for scheduling in Policy 9.3.2.2.1;**
- iii. whether the costs to retain the **heritage item ~~or building~~** (particularly as a result of damage) would be unreasonable;
- iv. the ability to retain the overall **heritage values** and significance of the **heritage item ~~or building~~** through a reduced degree of **demolition**; and
- v. the level of significance of the **heritage item**.

### Relief Sought

The submitter requests the following amendments and decisions:

#### Plan Change 13 and 14

1. The Inner West Heritage Residential Area (HA6) Overlay **be deleted** across Christ's College and Crown land to the east of Rolleston Avenue (PC13 and PC14), specifically:
  - 6 Armagh Street – Part Section 361 Town of Christchurch
  - 14 Armagh Street – Lot 2 DP 52794
  - 16 Armagh Street – Lot 1 DP 5524
  - 20 Armagh Street – Section 355 Town of Christchurch
  - 22 Armagh Street – Section 353 Town of Christchurch
  - 2- 8 Gloucester Street - Lot 1 Deposited Plan 36171, Part Lot 21 Deposited Plan 1003 and Part Section 365, Part Section 367 and Part Section 369 Town of Christchurch
  - 7 Gloucester Street – Town Section 360 City of Christchurch
  - 9 Gloucester Street – Lot 1 DP 52794
  - 13 Gloucester Street – Lot 1 DP 4097
  - 14 Gloucester Street – Part Lot 21-22 DP 1003
  - 19 Gloucester Street – Town Section 354 City of Christchurch
  - 64 Rolleston Avenue – Section 362 Town of Christchurch
  - 72 Rolleston Avenue – Section 363 and Part Section 361 Town of Christchurch
2. The alternate zone listed in Appendix 13.6.6.3 for Christ's College **be retained** as High Density Residential zone (PC14).

3. **Amend** the Central City Planning Map to rezone 21 Gloucester Street to Specific Purpose (Schools) Zone (PC13 and 14).
4. **Reject** all notified changes to 9.3.2.2.8 Policy – Demolition of scheduled historic heritage (PC13 and PC14).

### **Overall Conclusion**

Christ's College's ability to maintain their Historic Campus west of Rolleston Avenue is dependent on Christ's College being able to utilise their total landholdings to achieve maximum opportunities and efficiencies. The land on the eastern side of Rolleston Avenue provides the potential to expand and/or enhance educational support and classroom facilities. In relation to the provisions and matters that Christ's College has raised concerns about, it is considered those require deletion, inclusion or amendment because without such, they:

- will not promote sustainable management of resources and will not achieve the purpose of the RMA;
- are contrary to Part 2 and other provisions of the RMA;
- will not enable the social and economic well-being of the community;
- will not meet the reasonably foreseeable needs of future generations;
- will not achieve integrated management of the effects of use, development or protection of land and associated resources of Christchurch City;
- will not enable the efficient use and development of the College's land and will not enable this land to be efficiently redeveloped to meet evolving educational needs; and
- do not represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions in relation to other means.

Christ's College could not gain an advantage in trade competition through this submission.

The suggested revisions do not limit the generality of the reasons for the submission.

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

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

**DATED** this 12th day of May 2023



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

## Submitter Details

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

**First name:** Hilary **Last name:** Talbot

### Preferred method of contact

### Postal address:

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Daytime Phone:** 0210328878

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

12 May submission on district plan

34 Hanmer Street

Christchurch 8011

12 May 2013

To Christchurch City Council

### **Submission on proposed Christchurch City District Plan Changes Nos 13 and 14**

My name is Hilary Talbot. I live at 34 Hanmer Street Christchurch. This address is in the proposed Englefield Avonville Heritage Area and the Englefield Character Area and the house is classified as Defining within the Heritage Area.

I have lived at this address for about 3 years and before that I lived for over 20 years in Thorndon Wellington. This was also in a historic area and some my comments are informed by that experience.

#### *1 Broad support of Englefield Heritage Area*

I support the creation of the Heritage Area and the continuation of the character area with more stringent controls. Hanmer Street provides a coherent streetscape and there are very few of these streetscapes left. Once broken they are gone forever.

#### *2 Support the retention of Englefield House*

I support the retention of Heritage listed Englefield House

#### *3 Tensions between modern life and older houses*

The creation of the heritage area does raise some issues going forward. Older houses have many fine qualities for living but in order to survive they need to be able to provide for modern life. This includes installing modern technology, making them more energy efficient and enabling more light to enter. There is a balance to be struck over retrofitting double glazing, sky lights, heat pump units, solar panels, external hot water cylinders, television aerials etc. This leads onto the comment below.

#### 4 *Comment on proposed rules*

The Council's website states:

We're proposing that, within the identified RHAs, resource consent would be needed for new buildings, additions or alterations to buildings, new fences and walls higher than 1.5 metres, and to demolish or relocate those buildings considered most significant (called "defining" or "contributory" buildings). We'll assess all **development** proposals on how they affect the heritage values of the area.

In the rules the permitted activities are a narrow category of maintenance and repairs (subject to council oversight).

Other activities appear to be regulated as resource consents. Some of these activities may be quite minor and many if not most out of sight of the road. This is wider than the word development I have bolded above. I assume the rules do not apply to the interiors of buildings in heritage areas unless they are listed as heritage items but this is not

The reason I have focused on this is from experience. In the area I lived in Wellington we were subject to two broad rules - demolition of buildings constructed before 1930 and window alterations would require resource consents.

At some juncture the Wellington council issued a draft proposal to have more detailed regulation including restricting satellite dishes (very useful when you live against a hill) and skylights. This caused quite a back-lash. Time shows attachments like satellite dishes, however ugly, don't affect houses permanently. Skylights facing the road can be inappropriate but there are more discrete sites for their placement. But it was unfair as many houses already had them in place. These examples show that achieving the right balance can be challenging.

I submit that the drafting of these rules should be reviewed to see if a more nuanced approach to buildings in heritage areas is appropriate.

Based on Wellington experience I support proposed regulation of fences.

#### 5 *Boundary of heritage area and buffer zones*

The Council's website states:

The areas themselves, and the rules we're proposing for these areas, are new to the District Plan. Our proposal also includes introducing a buffer for Residential Heritage Areas, with a high-density border to better protect their edges.

It is not clear how this buffer zone will work. Gilby Street at the back of Hanmer Street is zoned High Density but there is no indication of its protective feature.

I support a protective buffer zone for the Heritage area.

**6. *New buildings in heritage area***

The proposed Englefield Area is relatively intact but it appears that the Council housing site on Elm Grove may be subject to development at some stage. The plan appears to contain rules designed to ensure any rebuilding supports the heritage character. I support rules which achieve this.

I wish to be heard in support of this submission.

