

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Jean **Last name:** Turner

On behalf of:

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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

Chapter 14 Residential **Points:** 01.1

Support

Oppose

Seek Amendment

I seek the following decision from the Council

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

Please see the attached pdf for my submissions.

My submission is that

Please see the attached pdf for my submissions.

Attached Documents

File

Jean Sub PLAN CHANGE 14 CCC 2023-05-12

Submissions:

Chapter 14 Residential: 14.4.1.1 Permitted activities

Seek Amendment

My submission is that

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

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

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

"3.3.4 Objective - Housing bottom lines and choice: b. There is a range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents, including: i. a choice in housing, types, densities and locations."

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 There is a critical shortage of land available for Tiny Homes and Transportable Homes due to outdated restrictions like these.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

I seek the following decision from the Council

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

Chapter 14 Residential: 14.4.1.1 Permitted activities

Seek Amendment

My submission is that

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

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

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

“3.3.4 Objective - Housing bottom lines and choice: b. There is a range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents, including: i. a choice in housing, types, densities and locations.”

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

I seek the following decision from the Council

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

Chapter 14 Residential: 14.4.1.1 Permitted activities

Seek Amendment

My submission is that

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

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

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

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

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

I seek the following decision from the Council

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

Chapter 14 Residential: 14.4.2.3 Building height

Seek Amendment

My submission is that

Regarding 14.4.2.3 Building height (Residential Suburban Zone and Residential Suburban Density Transition Zone):

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

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

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

I seek the following decision from the Council

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

Chapter 14 Residential: 14.4.2.5 Outdoor living space

Seek Amendment

My submission is that

Regarding 14.4.2.5 Outdoor living space (Residential Suburban Zone and Residential Suburban Density Transition Zone):

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

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

"3.3.4 Objective - Housing bottom lines and choice: b. There is a range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents, including: i. a choice in housing, types, densities and locations."

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

I seek the following decision from the Council

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

Chapter 14 Residential: 14.4.2.9 Road boundary building setback

Seek Amendment

My submission is that

Regarding 14.4.2.9 Road boundary building setback (Residential Suburban Zone and Residential Suburban Density Transition Zone):

I would like CCC to set the minimum distance between the road boundary and buildings to 1.5m (down from 4.5m), which is the minimum requirement for the MDRS Front yard. This does not affect sunlight as the height at that point is regulated by the recession plane.

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

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

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

I seek the following decision from the Council

I would like CCC to set the minimum distance between the road boundary and buildings to 1.5m (down from 4.5m), which is the minimum requirement for the MDRS Front yard. This does not affect sunlight as the height at that point is regulated by the recession plane.

Chapter 14 Residential: 14.13 Rules — Enhanced Development Mechanism

Seek Amendment

My submission is that

Regarding 14.13.1.1 Zoning qualifying standards (Enhanced Development Mechanism):

I wish for CCC to allow Qualifying Sites to be in any Residential Suburban area, not only in the Residential Suburban Density Transition (RSDT) zone.

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

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

Due to the new requirements of the MRDS to increase density, I believe that the EDMs need to be modified to accommodate the MRDS needs without compromising CCC's qualifying matters. The requested change above does not compromise CCC's qualifying matters, as it still ensures that EDMs are close to core public transport routes, etc.

I seek the following decision from the Council

I WANT CCC TO 1) permit Qualifying Sites to be located in ANY Residential Suburban zone, (not just the Residential Suburban Density Transition Zone).

Chapter 14 Residential: 14.13 Rules — Enhanced Development Mechanism

Seek Amendment

My submission is that

Regarding 14.13.3.5 Minimum unit size, and mix of units (Enhanced Development Mechanism):

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

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

"3.3.4 Objective - Housing bottom lines and choice: b. There is a range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents, including: i. a choice in housing, types, densities and locations."

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

I seek the following decision from the Council

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

Chapter 14 Residential: 14.13 Rules — Enhanced Development Mechanism

Seek Amendment

My submission is that

Regarding 14.13.3.7 Outdoor living space (Enhanced Development Mechanism):

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

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

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

“3.3.4 Objective - Housing bottom lines and choice: b. There is a range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents, including: i. a choice in housing, types, densities and locations.”

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

I seek the following decision from the Council

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

Planning Maps: Wainoni Road: Inappropriate Qualifying Matter of “Low Public Transport Accessibility Area”

Seek Amendment

My submission is that

Regarding Planning Map for Properties from 100 to 193 Wainoni Road (and further afield):

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

Bus 80 travels down Wainoni Road (in a Residential Suburban Zone), with regular bus stops on both sides of the road. Bus 80 arrives every 15 minutes (such as from 8:18 am to 8:33 am weekdays), from Waimari Beach to the Central City and back

(<https://www.metroinfo.co.nz/timetables/80-lincoln-parklands/>). This seems to satisfy the requirement to be near public transportation that connects to the central city.

For contrast:

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

Therefore, Wainoni and Keyes Roads clearly have regular bus stops to the central city. This label is illogical in relation to PC14 or the stated purpose of Qualifying Matters, and it is unjust when compared to nearby streets with similar or worse bus routes but have no Qualifying Matter of "Low Public Transport Accessibility Area."

I seek the following decision from the Council

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

Planning Maps: Wainoni Road: "Tsunami Management Area"

Seek Amendment

My submission is that

Regarding Planning Map for Properties from 157 to 193 Wainoni Road (and further afield):

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

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

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

Furthermore, It is clear that entire properties like 157 to 193 Wainoni Road should not be limited to Residential Suburban Zone based on Qualifying Matters that only apply to a small portion of their properties.

Evidence:

157 to 193 Wainoni Road (Residential Suburban Zone) have the Northern boundary back on to Chisnalwood School and a very minor network stream, with a small portion of the Northern boundary being lower lying. It is ONLY that small northern portion of these properties that have the Qualifying Matter of "Tsunami Management Area".

This can be proven by looking at 189 Wainoni Road that is cut in half:

- 2/189 Wainoni Road, Wainoni - this is the Northern half, and is marked with the Qualifying Matter of "Tsunami Management Area".
- 1/189 Wainoni Road, Wainoni - this is the Southern half, and is NOT marked with the Qualifying Matter of "Tsunami Management Area".

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

I seek the following decision from the Council

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

Planning Maps: Wainoni Road: "Water body Setback"

Seek Amendment

My submission is that

Regarding Planning Map for Properties from 135 to 185 Wainoni Road (and further afield):

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

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

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

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

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

I seek the following decision from the Council

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

Planning Maps: Wainoni Road: Should be MDRZ based on Enhanced Development Mechanism criteria

Seek Amendment

My submission is that

Regarding Planning Map for Properties from ~100 to ~300 Wainoni Road (and further afield):

I WANT CCC TO rezone area with 800 metres of Pak n Save Wainoni, to “Medium Density Residential Zone” because it is close to all required amenities and passes all EDM tests, with much better results than many other areas that are already “Medium Density Residential Zone”.

It should be recognised that ~100 to ~300 Wainoni Road is close to all required amenities. The MDRS does not have such a good amenities list as the CCC District Plan 14.13 Enhanced Development Mechanism (EDM), which we will use as a comparison that passes on all 4 tests:

- 800 metres EDM walking distance of a supermarket: Yes, using Pak n Save Wainoni.
- 800 metres EDM walking distance of either a primary or intermediate school: Yes, using Chisnallwood Intermediate.
- 400 metres EDM walking distance of an Open Space Zone that has an area greater than 4000m²: Yes, using either Shortland Playground (6200sqm), or Wainoni Park (54,000sqm)
- 600 metres EDM walking distance of an EDM core public transport route: Yes, Bus route 80 travels down the full length of Wainoni Road (<https://www.metroinfo.co.nz/timetables/80-lincoln-parklands/>).

This can be compared to areas like around Niagara Street, Wainoni, which are “Medium Density Residential Zone”, but pass only 1 of the 4 EDM tests above: No close supermarket, No close school, No close Open Space Zone, has a close Bus Route.

Combined with previous issues discussed about Qualifying Matters being less than or equal to proposed “Medium Density Residential Zones”, there is a strong case that Properties from ~100 to ~300 Wainoni Road (and further afield) should also be “Medium Density Residential Zone”.

I seek the following decision from the Council

I WANT CCC TO rezone area with 800 metres of Pak n Save Wainoni, to “Medium Density Residential Zone” because it is close to all required amenities and passes all EDM tests, with much better results than many other areas that are already “Medium Density Residential Zone”.

Planning Maps: Keyes Road: Inappropriate Qualifying Matter of “Low Public Transport Accessibility Area”

Seek Amendment

My submission is that

Regarding Planning Map for Properties for all of Keyes Road (and further afield):

I am wanting CCC to remove the Qualifying Matter of "Low Public Transport Accessibility Area" on all of Keyes Road (and beyond), or on all roads that have regular bus stops to the central city. This is because it is simply not an accurate label.

Bus 60 goes down Keyes Road (most of which is in Residential Suburban Zone), with regular bus stops on both sides of the road. Bus 60 comes every 15minutes, from New Brighton to the Central City and back (<https://www.metroinfo.co.nz/timetables/60-hillmorton-southshore/>). This seems to satisfy the need to be close to public transport that links to the central city.

For comparison:

- [17 Tonks Street, New Brighton \(Medium Density Residential Zone\) to Cathedral Square](#) at 6pm would take 41mins on Bus 60, with 12min walk. No Qualifying Matter for Public Transport.
- [270 Keyes Road, New Brighton \(Residential Suburban Zone\) to Cathedral Square](#) at 6pm would take 31mins on Bus 60, with 1min walk. Or worst case, would take 35mins on Bus 5, with 12min walk. Both options are better than 17 Tonks Street.

Bus 60 has the Qualifying Matter of "Low Public Transport Accessibility Area", whereas Bus 135 does not have this issue, even though it has far lower "Public Transport Accessibility" than Bus 80.

Therefore, Wainoni and Keyes Roads clearly have regular bus stops to the central city. This label is illogical in relation to PC14 or the stated purpose of Qualifying Matters, and it is unjust when compared to nearby streets with similar or worse bus routes but have no Qualifying Matter of "Low Public Transport Accessibility Area."

I seek the following decision from the Council

I am wanting CCC to remove the Qualifying Matter of "Low Public Transport Accessibility Area" on all of Keyes Road (and beyond), or on all roads that have regular bus stops to the central city. This is because it is simply not an accurate label.

Planning Maps: Keyes Road: "Tsunami Management Area"

Seek Amendment

My submission is that

Regarding Planning Map for Properties for the Residential Suburban portion of Keyes Road (and further afield):

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

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

I seek the following decision from the Council

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

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Anita **Last name:** Moir

On behalf of:

Preferred method of contact Email

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Country: New Zealand

Postcode: 7430

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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

Planning MapsPoints: 02.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

Please see the attached pdf

My submission is that

Please see the attached pdf

Attached Documents

File

Submission Plan Change 14 CCC 2023-05-11 Anita

Submissions:

Chapter 14 Residential: 14.4.1.1 Permitted activities

Seek Amendment

My submission is that

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

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

The current net floor area requirements are not aligned with the MDRS which has no such restrictions.

The current CCC modifications to their District Plan are not sufficient.

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

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

Therefore, the current net floor area requirements also do not meet the District Plan's Objectives, e.g.

"3.3.4 Objective - Housing bottom lines and choice: b. There is a range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents, including: i. a choice in housing, types, densities and locations.".

There has indeed been a change in housing needs - house affordability has become a critical failure, and Tiny Homes and Transportable Homes have become extremely popular, however, due to antiquated restrictions like this, there is a critical shortage of land where they can be placed.

To give some examples:

A 8x3m studio unit (24sqm) is more than sufficient, still has all the amenities of a bathroom, kitchen, bedroom area and living area, and can cost under \$90,000 to build including a building consent.

A 12x4m unit (48sqm) can have 2 large (3x4m) bedrooms, a full bathroom (including washing machine and dryer), and a generous kitchen (over 5 lineal meters of kitchen cabinetry), and cost under \$140,000 including a building consent.

A 14x4m unit (56sqm) can have 3 bedrooms including 2 large (3x4m) ones, a full bathroom (including washing machine and dryer), and a generous kitchen (over 5 lineal meters of kitchen cabinetry), and cost under \$160,000 including a building consent.

This becomes more clearly relevant to the MDRS as the MDRS requests smaller net floor areas, and there is no relevant justification to not allow it, the CCC District Plan Objectives call for this diversity too, so this aspect of the MDRS (smaller net floor areas) should be incorporated into PC14.

I seek the following decision from the Council

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

Chapter 14 Residential: 14.4.1.1 Permitted activities

Seek Amendment

My submission is that

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

I WANT CCC TO 2) To enable the option for outdoor living spaces to be shared or partially shared with neighbouring dwellings. Or at least a portion of outdoor living spaces should be able to be satisfied by shared greenspaces.

Many younger people are not interested in the work required to maintain their own outdoor living space. They also do not see the benefit in a smaller area of exclusive use, when they could have a much larger area that is shared. Some “pocket neighbourhoods” or “co-housing” developments even have a shared entertainment area, so that this facility is still available on the more rare occasions that it is required. Therefore, there has indeed been a change in housing needs - many people are interested in the convenience and cheaper cost in having a larger shared greenspace, that might even include community gardens.

Therefore, the District Plan needs to be updated to fulfil its Objectives, e.g. “3.3.4 Objective - Housing bottom lines and choice: b. There is a range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents, including: i. a choice in housing types, densities and locations.”.

It is appreciated that not all people will want this, but that is fine - enough people want it that there should be option available for it, and the market will find its own balance of how many are build to meet demand.

This becomes more clearly relevant to the MDRS in point 3) below, but in summary, the MDRS only requires outdoor living space of “Ground floor: 20 m², 3 m dimension”, and CCC has no relevant justification to not allow it, the CCC District Plan Objectives call for this diversity too, so PC14 should allow for at least a portion of outdoor living spaces should be able to be satisfied by shared greenspaces.

For example, the 20sqm outdoor living (required in theMDRS) could be required to be separate outdoor living per dwelling, but then any larger outdoor living area requirement should be allowed to be made up from shared outdoor living areas.

I seek the following decision from the Council

I WANT CCC TO 2) To enable the option for outdoor living spaces to be shared or partially shared with neighbouring dwellings. Or at least a portion of outdoor living spaces should be able to be satisfied by shared greenspaces.

Chapter 14 Residential: 14.4.1.1 Permitted activities

Seek Amendment

My submission is that

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

I WANT CCC TO 3) To increase the number of dwellings per 450sqm site from 2 (1x residential unit and 1x minor dwelling) to 3 as a permitted activity, as long as they are only 1 storey (or limited to 4-5m high). The current CCC modifications to their District Plan are not sufficient.

The MDRS calls for 3 dwellings per site of up to 3 storeys each. While I appreciate more than 1 storey has considerably more sunlight shading issues, 1 storey does not have these issues. Therefore, there is far less risk of introducing higher density of 1 storey dwellings into this zone.

Limiting to 1 storey would also limit the extent of intensification, so would not require such careful consideration of public transport, etc.

Combined with decreasing the net floor area requirements of these homes (e.g. by 33%), there would be enough space for 3 smaller single storey dwellings per site.

Combined with the option for shared green spaces, there would be plenty of space for 3 smaller single storey dwellings per site.

I seek the following decision from the Council

I WANT CCC TO 3) To increase the number of dwellings per 450sqm site from 2 (1x residential unit and 1x minor dwelling) to 3 as a permitted activity, as long as they are only 1 storey (or limited to 4-5m high).

Chapter 14 Residential: 14.4.2.3 Building height

Seek Amendment

My submission is that

Regarding 14.4.2.3 Building height (Residential Suburban Zone and Residential Suburban Density Transition Zone):

I WANT CCC TO 4) reduce building height to a max of 5m IF there are 3 dwellings per 450sqm site (which should also be introduced in combination with this).

The MDRS calls for 3 dwellings per site of up to 3 storeys each. While I appreciate more than 1 storey has considerably more sunlight shading issues, 1 storey does not have these issues. Therefore, there is far less risk to introducing higher density of 1 storey dwellings into this zone.

So I support the CCC approach of being far more careful about sunlight shading issues for higher density (3 dwellings per site), but these sunlight shading issues are not a concern for smaller, separate, 1 storey homes (or 5m max height).

Therefore, it seems unreasonable for CCC to reject the MRDS in its entirety in Residential Suburban Zone and Residential Suburban Density Transition Zones, when some of it (density) could be effectively incorporated as long as it did not impact on sunlight shading issues (caused by height).

Limiting to 1 storey would also limit the extent of intensification, so would not require such careful consideration of public transport, etc.

I seek the following decision from the Council

I WANT CCC TO 4) reduce building height to a max of 5m IF there are 3 dwellings per 450sqm site.

Chapter 14 Residential: 14.4.2.5 Outdoor living space

Seek Amendment

My submission is that

Regarding 14.4.2.5 Outdoor living space (Residential Suburban Zone and Residential Suburban Density Transition Zone):

I WANT CCC TO 2) To enable the option for outdoor living spaces to be shared or partially shared with neighbouring dwellings. Or at least a portion of outdoor living spaces should be able to be satisfied by shared greenspaces.

Many younger people are not interested in the work required to maintain their own outdoor living space. They also do not see the benefit in a smaller area of exclusive use, when they could have a much larger area that is shared. Some “pocket neighbourhoods” or “co-housing” developments even have a shared entertainment area, so that this facility is still available on the more rare occasions that it is required. Therefore, there has indeed been a change in housing needs - many people are interested in the convenience and cheaper cost in having a larger shared greenspace, that might even include community gardens.

Therefore, the District Plan needs to be updated to fulfil its Objectives, e.g. “3.3.4 Objective - Housing bottom lines and choice: b. There is a range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents, including: i. a choice in housing, types, densities and locations.”.

It is appreciated that not all people will want this, but that is fine - enough people want it that there should be option available for it, and the market will find its own balance of how many are build to meet demand.

This becomes more clearly relevant to the MDRS in point 3) below, but in summary, the MDRS only requires outdoor living space of “Ground floor: 20 m2, 3 m dimension”, and CCC has no relevant justification to not allow it, the CCC District Plan Objectives call for this diversity too, so PC14 should allow for at least a portion of outdoor living spaces should be able to be satisfied by shared greenspaces.

For example, the 20sqm outdoor living (required in theMDRS) could be required to be separate outdoor living per dwelling, but then any larger outdoor living area requirement should be allowed to be made up from shared outdoor living areas.

I seek the following decision from the Council

I WANT CCC TO 2) To enable the option for outdoor living spaces to be shared or partially shared with neighbouring dwellings. Or at least a portion of outdoor living spaces should be able to be satisfied by shared greenspaces.

Chapter 14 Residential: 14.4.2.9 Road boundary building setback

Seek Amendment

My submission is that

Regarding 14.4.2.9 Road boundary building setback (Residential Suburban Zone and Residential Suburban Density Transition Zone):

I WANT CCC TO 6) reduce the minimum road boundary building setback from typically 4.5m to the MDRS Front yard minimum of 1.5m (height at that point is governed by the recession plane).

The current CCC modifications to their District Plan are not sufficient.

As I understand it, CCC can only reject MDRS requirements if there is a valid matter of concern. There is no valid matter of concern to reject the MDRS Front yard minimum of 1.5m. Front yard setback does not affect sunlight shading as height at that point is governed by the recession plane. Front yard setback does not affect Qualifying Matters such as “Low Public Transport Accessibility Area” or “Tsunami Management Area”, etc.

I seek the following decision from the Council

I WANT CCC TO 6) reduce the minimum road boundary building setback from typically 4.5m to the MDRS Front yard minimum of 1.5m (height at that point is governed by the recession plane).

Chapter 14 Residential: 14.13 Rules — Enhanced Development Mechanism

Seek Amendment

My submission is that

Regarding 14.13.1.1 Zoning qualifying standards (Enhanced Development Mechanism):

I WANT CCC TO 1) permit Qualifying Sites to be located in ANY Residential Suburban zone, (not just the Residential Suburban Density Transition Zone).

EDMs are already restricted by location in 14.13.1.4 to be close to functional services (shopping malls, Open Space Zones, Core Public Transport Routes, etc), which are far more relevant as they ensure higher functionality is available.

Therefore, there is no need to have EDMs further restricted to be in the RSDT Zone as that has no impact on the functional services available to residents.

Due to the new requirements of the MRDS to increase density, I think the EDMs needs to be modified to incorporate as much of the MRDS needs as possible without compromising the CCCs Qualifying matters.

The change requested above does not compromise the CCCs Qualifying matters, as it still ensures it is close to Core Public Transport Routes, etc.

I seek the following decision from the Council

I WANT CCC TO 1) permit Qualifying Sites to be located in ANY Residential Suburban zone, (not just the Residential Suburban Density Transition Zone).

Chapter 14 Residential: 14.13 Rules — Enhanced Development Mechanism

Seek Amendment

My submission is that

Regarding 14.13.3.5 Minimum unit size, and mix of units (Enhanced Development Mechanism):

I WANT CCC TO 2) decrease the net floor area requirements of these homes (e.g. by 33%).

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

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

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

Therefore, the current net floor area requirements do not meet the District Plan's Objectives, e.g. "3.3.4 Objective - Housing bottom lines and choice: b. There is a range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents, including: i. a choice in housing, types, densities and locations."

There has indeed been a change in housing needs - house affordability has become a critical failure, and Tiny Homes and Transportable Homes have become extremely popular, however, due to antiquated restrictions like this, there is a critical shortage of land where they can be placed.

To give some examples:

A 8x3m studio unit (24sqm) is more than sufficient, still has all the amenities of a bathroom, kitchen, bedroom area and living area, and can cost under \$90,000 to build including a building consent.

A 12x4m unit (48sqm) can have 2 large (3x4m) bedrooms, a full bathroom (including washing machine and dryer), and a generous kitchen (over 5 lineal meters of kitchen cabinetry), and cost under \$140,000 including a building consent.

A 14x4m unit (56sqm) can have 3 bedrooms including 2 large (3x4m) ones, a full bathroom (including washing machine and dryer), and a generous kitchen (over 5 lineal meters of kitchen cabinetry), and cost under \$160,000 including a building consent.

This becomes more clearly relevant to the MDRS as the MDRS requests smaller net floor areas, and there is no relevant justification to not allow it, the CCC District Plan Objectives call for this diversity too, so this aspect of the MDRS (smaller net floor areas) should be incorporated into PC14.

I seek the following decision from the Council

I WANT CCC TO 2) decrease the net floor area requirements of these homes (e.g. by 33%).

The current net floor area requirements are not aligned with the MDRS which has no such restrictions.

The current CCC modifications to their District Plan are not sufficient.

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

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

Chapter 14 Residential: 14.13 Rules — Enhanced Development Mechanism

Seek Amendment

My submission is that

Regarding 14.13.3.7 Outdoor living space (Enhanced Development Mechanism):

I WANT CCC TO 2) To enable the option for outdoor living spaces to be shared or partially shared with neighbouring dwellings. Or at least a portion of outdoor living spaces should be able to be satisfied by shared greenspaces.

Many younger people are not interested in the work required to maintain their own outdoor living space. They also do not see the benefit in a smaller area of exclusive use, when they could have a much larger area that is shared. Some "pocket neighbourhoods" or "co-housing" developments even have a shared entertainment area, so that this facility is still available on the more rare occasions that it is required. Therefore, there has indeed been a change in housing needs - many people are interested in the convenience and cheaper cost in having a larger shared greenspace, that might even include community gardens.

Therefore, the District Plan needs to be updated to fulfil its Objectives, e.g. "3.3.4 Objective - Housing bottom lines and choice: b. There is a range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents, including: i. a choice in housing, types, densities and locations."

It is appreciated that not all people will want this, but that is fine - enough people want it that there should be option available for it, and the market will find its own balance of how many are build to meet demand.

This becomes more clearly relevant to the MDRS in point 3) below, but in summary, the MDRS only requires outdoor living space of "Ground floor: 20 m², 3 m dimension", and CCC has no relevant justification to not allow it, the CCC District Plan Objectives call for this diversity too, so PC14 should allow for at least a portion of outdoor living spaces should be able to be satisfied by shared greenspaces.

For example, the 20sqm outdoor living (required in theMDRS) could be required to be separate outdoor living per dwelling, but then any larger outdoor living area requirement should be allowed to be made up from shared outdoor living areas.

I seek the following decision from the Council

I WANT CCC TO 2) To enable the option for outdoor living spaces to be shared or partially shared with neighbouring dwellings. Or at least a portion of outdoor living spaces should be able to be satisfied by shared greenspaces.

Planning Maps: Wainoni Road: Inappropriate Qualifying Matter of “Low Public Transport Accessibility Area”

Seek Amendment

My submission is that

Regarding Planning Map for Properties from 100 to 193 Wainoni Road (and further afield):

I WANT CCC TO 1) remove the Qualifying Matter of “Low Public Transport Accessibility Area” in this area from 100 to 193 Wainoni Road (and further afield), or on all roads on regular bus stops to the central city.

Bus 80 goes down Wainoni Road (all in Residential Suburban Zone), with regular bus stops on both sides of the road. Bus 80 comes every 15 minutes (e.g. 8:18am to 8:33am weekdays), from Waimari Beach to the Central City and back (<https://www.metroinfo.co.nz/timetables/80-lincoln-parklands/>). This seems to satisfy the need to be close to public transport that links to the central city.

For Comparison, Pages Road (running parallel to Wainoni Road), is Medium Density Residential Zone, and is also serviced by a single Bus - Bus 5, with regular bus stops on both sides of the road. Bus 5 also comes every 13 minutes (e.g. 8:32am to 8:45am weekdays), from New Brighton to the Central City and back (<https://www.metroinfo.co.nz/timetables/5-rolleston-newbrighton/>).

Bus 80 has the Qualifying Matter of “Low Public Transport Accessibility Area”, whereas Bus 5 does not have this issue, even though it is very similar to Bus 80.

Or for another comparison:

- [38 Lyndhurst Crescent, Wainoni \(Medium Density Residential Zone\) to Cathedral Square](#) at 6pm would take 31mins on Bus 5, with 12min walk. No Qualifying Matter for Public Transport.
- [183 Wainoni Road, Avondale \(Residential Suburban Zone\) to Cathedral Square](#) at 6pm would take 25mins on Bus 80, with 1min walk. Or worst case, would take 32mins on Bus 5, with 14min walk.

So it makes no sense to have a Qualifying Matter of “Low Public Transport Accessibility Area” on roads that have regular bus stops to the central city. E.g. Wainoni and Keyes Road. It makes no sense with relation to the District Plan Objectives or stated purpose of Qualifying Matters, and it is not fair when compared to nearby streets with similar or worse bus routes but have no Qualifying Matter of “Low Public Transport Accessibility Area”.

I seek the following decision from the Council

I WANT CCC TO 1) remove the Qualifying Matter of “Low Public Transport Accessibility Area” in this area from 100 to 193 Wainoni Road (and further afield), or on all roads on regular bus stops to the central city.

Planning Maps: Wainoni Road: “Tsunami Management Area”

Seek Amendment

My submission is that

Regarding Planning Map for Properties from 157 to 193 Wainoni Road (and further afield):

I WANT CCC TO 2) rezone this area from 157 to 193 Wainoni Road (and further afield), to “Medium Density Residential Zone” because the Qualifying Matter of “Tsunami Management Area” only applies to a small part of the properties, and is less of a risk than places like Marine Parade that are “Medium Density Residential Zone” with the Qualifying Matter of “Tsunami Management Area” applying to the whole property.

157 to 193 Wainoni Road (Residential Suburban Zone) have the Northern boundary back on to Chisnalwood School and a very minor network stream, with a small portion of the Northern boundary being lower lying. It is ONLY that small northern portion of these properties that have the Qualifying Matter of “Tsunami Management Area”.

This can be proven by looking at 189 Wainoni Road that is cut in half:

- 2/189 Wainoni Road, Wainoni - this is the Northern half, and is marked with the Qualifying Matter of “Tsunami Management Area”.
- 1/189 Wainoni Road, Wainoni - this is the Southern half, and is NOT marked with the Qualifying Matter of “Tsunami Management Area”.

Compare this to areas like Marine Parade and others that are Medium Density Residential Zone, yet they have a Qualifying Matter of “Tsunami Management Area” across the entire property, and in addition, some of them have “Coastal Hazard Medium Risk Management Area”.

So there are at least 2 problems with this:

1. Entire properties like 157 to 193 Wainoni Road should not be limited to Residential Suburban Zone based on Qualifying Matters that only apply to a small portion of their properties.
2. 157 to 193 Wainoni Road should be Medium Density Residential Zone, as they have less risks than existing Medium Density Residential Zones like Marine Parade and others, that not only have the risk across their whole property, but also have additional risks that 157 to 193 Wainoni Road does not have. NOTE: Public Transport is not a valid reason to limit 157 to 193 Wainoni Road - as addressed earlier, this area is as good or better Public Transport than existing Medium Density Residential Zones.

I seek the following decision from the Council

I WANT CCC TO 2) rezone this area from 157 to 193 Wainoni Road (and further afield), to “Medium Density Residential Zone” because the Qualifying Matter of “Tsunami Management Area” only applies to a small part of the properties, and is less of a risk than places like Marine Parade that are “Medium Density Residential Zone” with the Qualifying Matter of “Tsunami Management Area” applying to the whole property.

Planning Maps: Wainoni Road: “Water body Setback”

Seek Amendment

My submission is that

Regarding Planning Map for Properties from 135 to 185 Wainoni Road (and further afield):

I WANT CCC TO 3) rezone this area from 135 to 185 Wainoni Road (and further afield), to “Medium Density Residential Zone” because the Qualifying Matter of “Water body Setback” only applies to a very small (5m wide) part of the properties, and is less of a risk than places like Marine Parade that are “Medium Density Residential Zone” with the Qualifying Matter of “Coastal Hazard Medium Risk Management Area” applying to the whole property.

135 to 185 Wainoni Road (Residential Suburban Zone) have the Northern boundary back on to a very small Network Stream, that the District Plan states should have a setback of 5m. The rest of the property unaffected by this setback is typically about 65m long.

Therefore, it does not seem fair to restrict all of these entire properties to Residential Suburban Zone when only 5m out of 65m is affected.

The Water body Setback is already protected by the 5m setback from the District Plan, and with good design, could be maximised and appreciated as an outdoor living greenspace, even in, or particularly in Medium Density Residential use.

The Water body Setback does not pose much of a flooding risk, as it is intended to actually mitigate flooding risk by draining flood waters away. If there is any flood risk, it is limited to the low area beside the Network Stream, otherwise it would be marked as “Floodplain Hazard Management Area”, which it is not.

NOTE: Public Transport is not a valid reason to limit 157 to 193 Wainoni Road - as addressed earlier, this area is as good or better Public Transport than existing Medium Density Residential Zones.

I seek the following decision from the Council

I WANT CCC TO 3) rezone this area from 135 to 185 Wainoni Road (and further afield), to “Medium Density Residential Zone” because the Qualifying Matter of “Water body Setback” only applies to a very small (5m wide) part of the properties, and is less of a risk than places like Marine Parade that are “Medium Density Residential Zone” with the Qualifying Matter of “Coastal Hazard Medium Risk Management Area” applying to the whole property.

Planning Maps: Wainoni Road: Should be MDRZ based on Enhanced Development Mechanism criteria

Seek Amendment

My submission is that

Regarding Planning Map for Properties from ~100 to ~300 Wainoni Road (and further afield):

I WANT CCC TO 4) rezone this area from ~100 to ~300 Wainoni Road (and further afield), to “Medium Density Residential Zone” because it is close to all required amenities - closer than many other areas that are already “Medium Density Residential Zone”.

It should be recognised that ~100 to ~300 Wainoni Road is close to all required amenities. The MDRS does not have such a good amenities list as the CCC District Plan 14.13 Enhanced Development Mechanism (EDM), which we will use as a comparison that passes on all 4 tests:

- 800 metres EDM walking distance of a supermarket: Yes, using Pak n Save Wainoni.
- 800 metres EDM walking distance of either a primary or intermediate school: Yes, using Chisnallwood Intermediate.
- 400 metres EDM walking distance of an Open Space Zone that has an area greater than 4000m²: Yes, using either Shortland Playground (6200sqm), or Wainoni Park (54,000sqm)
- 600 metres EDM walking distance of an EDM core public transport route: Yes, Bus route 80 travels down the full length of Wainoni Road

(<https://www.metroinfo.co.nz/timetables/80-lincoln-parklands/>).

This can be compared to areas like around Niagara Street, Wainoni, which are “Medium Density Residential Zone”, but pass only 1 of the 4 EDM tests above: No close supermarket, No close school, No close Open Space Zone, has a close Bus Route.

Combined with previous issues discussed about Qualifying Matters being less than or equal to proposed “Medium Density Residential Zones”, there is a strong case that Properties from ~100 to ~300 Wainoni Road (and further afield) should also be “Medium Density Residential Zone”.

I seek the following decision from the Council

I WANT CCC TO 4) rezone this area from ~100 to ~300 Wainoni Road (and further afield), to “Medium Density Residential Zone” because it is close to all required amenities - closer than many other areas that are already “Medium Density Residential Zone”.

Planning Maps: Keyes Road: Inappropriate Qualifying Matter of “Low Public Transport Accessibility Area”

Seek Amendment

My submission is that

Regarding Planning Map for Properties for all of Keyes Road (and further afield):

I WANT CCC TO 5) remove the Qualifying Matter of “Low Public Transport Accessibility Area” on all of Keyes Road (and further afield), or on all roads on regular bus stops to the central city.

Bus 60 goes down Keyes Road (most of which is in Residential Suburban Zone), with regular bus stops on both sides of the road. Bus 60 comes every 15minutes, from New Brighton to the Central City and back (<https://www.metroinfo.co.nz/timetables/60-hillmorton-southshore/>). This seems to satisfy the need to be close to public transport that links to the central city.

For Comparison, Marine Parade (even North of Rawhiti Domain), is Medium Density Residential Zone, and is also serviced by a single Bus - Bus 135, with regular bus stops on both sides of the road. Bus 135 also comes much less frequently - every 60 minutes (e.g. 7:45am to 8:45am weekdays), from New Brighton to the Palms - it does NOT go to the central city

(<https://www.metroinfo.co.nz/timetables/135-new-brighton-the-palms/>).

Bus 60 has the Qualifying Matter of “Low Public Transport Accessibility Area”, whereas Bus 135 does not have this issue, even though it has far lower “Public Transport Accessibility” than Bus 80.

Or for another comparison:

- [17 Tonks Street, New Brighton \(Medium Density Residential Zone\) to Cathedral Square](#) at 6pm would take 41mins on Bus 60, with 12min walk. No Qualifying Matter for Public Transport.
- [270 Keyes Road, New Brighton \(Residential Suburban Zone\) to Cathedral Square](#) at 6pm would take 31mins on Bus 60, with 1min walk. Or worst case, would take 35mins on Bus 5, with 12min walk. Both options are better than 17 Tonks Street.

So it makes no sense to have a Qualifying Matter of “Low Public Transport Accessibility Area” on roads that have regular bus stops to the central city. E.g. Wainoni and Keyes Road. It makes no sense with relation to the District Plan Objectives or stated purpose of Qualifying Matters, and it is not fair when compared to nearby streets with similar or worse bus routes but have no Qualifying Matter of “Low Public Transport Accessibility Area”.

I seek the following decision from the Council

I WANT CCC TO 5) remove the Qualifying Matter of “Low Public Transport Accessibility Area” on all of Keyes Road (and further afield), or on all roads on regular bus routes to the central city.

Planning Maps: Keyes Road: “Tsunami Management Area”

Seek Amendment

My submission is that

Regarding Planning Map for Properties for the Residential Suburban portion of Keyes Road (and further afield):

I WANT CCC TO 6) rezone the Residential Suburban portion of Keyes Road, to “Medium Density Residential Zone” because the Qualifying Matter of “Tsunami Management Area” is not sufficient risk by itself as it is less of a risk than places like Marine Parade and 286 to 388 Keyes Road that are “Medium Density Residential Zone” with the Qualifying Matter of “Tsunami Management Area” and also “Coastal Hazard Medium Risk Management Area” applying to the whole property.

NOTE: Public Transport is not a valid reason to limit Keyes Road - as addressed earlier, this area is as good or better Public Transport than existing Medium Density Residential Zones.

I seek the following decision from the Council

I WANT CCC TO 6) rezone the Residential Suburban portion of Keyes Road, to “Medium Density Residential Zone” because the Qualifying Matter of “Tsunami Management Area” is not sufficient risk by itself as it is less of a risk than places like Marine Parade and 286 to 388 Keyes Road that are “Medium

Density Residential Zone” with the Qualifying Matter of “Tsunami Management Area” and also “Coastal Hazard Medium Risk Management Area” applying to the whole property.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Tamsin **Last name:** Woods

On behalf of:

Preferred method of contact Email

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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

Planning MapsPoints: 03.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

My submission is that

attached

Attached Documents

File

Tamsin Sub PC14

Submissions:

Chapter 14 Residential: 14.4.1.1 Permitted activities

Seek Amendment

My submission is that

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

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

The current PC14 draft by CCC needs further changes.

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

“3.3.4 Objective - Housing bottom lines and choice: b. There is a range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents, including: i. a choice in housing, types, densities and locations.”.

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

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

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

I seek the following decision from the Council

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

Chapter 14 Residential: 14.4.1.1 Permitted activities

Seek Amendment

My submission is that

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

I WANT CCC TO 2) To enable the option for individual outdoor living spaces to be smaller in lieu of outdoor living spaces shared or partially shared with neighbouring dwellings.

Therefore, the District Plan needs to be updated to fulfil its Objectives, e.g.

“3.3.4 Objective - Housing bottom lines and choice: b. There is a range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents, including: i. a choice in housing, types, densities and locations.”

there has indeed been a change in housing needs - many people are interested in the convenience and cheaper cost in having a larger shared greenspace, that might even include community gardens. Some “pocket neighbourhoods” or “co-housing” developments even have a shared entertainment area, so that this facility is still available as required.

Many younger people are not interested in the work required to maintain their own outdoor living space. They also do not see the benefit in a smaller area of exclusive use, when they could have a much larger area that is shared. Therefore, It is appreciated that not all people will want this, but that is fine - enough people want it that there should be an option available for it.

This becomes more clearly relevant to the MDRS in point 3) below, but in summary, the MDRS only requires outdoor living space of “Ground floor: 20 m², 3 m dimension”, and CCC has no relevant justification to not allow it, the CCC District Plan Objectives call for this diversity too, so PC14 should allow for at least a portion of outdoor living spaces should be able to be satisfied by shared greenspaces.

Another acceptable solution would be that the 20sqm outdoor living (required in the MDRS) could be required to be separate outdoor living per dwelling, but then any larger outdoor living area requirement should be allowed to be made up from shared outdoor living areas.

I seek the following decision from the Council

I WANT CCC TO 2) To enable the option for individual outdoor living spaces to be smaller in lieu of outdoor living spaces shared or partially shared with neighbouring dwellings.

Chapter 14 Residential: 14.4.1.1 Permitted activities

Seek Amendment

My submission is that

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

I WANT CCC TO 3) To increase the number of dwellings per 450sqm site from 2 (1x residential unit and 1x minor dwelling) to 3 as a permitted activity, as long as they are only 1 storey (or limited to 4-5m high).

The current CCC modifications to their District Plan are not sufficient.

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

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

The MDRS calls for 3 dwellings per site of up to 3 storeys each. While I appreciate more than 1 storey has considerably more sunlight shading issues, 1 storey does not have these issues. Therefore, there is far less risk of introducing higher density of 1 storey dwellings into this zone.

Limiting to 1 storey would also limit the extent of intensification, so would not require such careful consideration of public transport, etc.

I seek the following decision from the Council

I WANT CCC TO 3) To increase the number of dwellings per 450sqm site from 2 (1x residential unit and 1x minor dwelling) to 3 as a permitted activity, as long as they are only 1 storey (or limited to 4-5m high).

Chapter 14 Residential: 14.4.2.3 Building height

Seek Amendment

My submission is that

Regarding 14.4.2.3 Building height (Residential Suburban Zone and Residential Suburban Density Transition Zone):

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

I support the CCC approach of being far more careful about sunlight shading issues for higher density (3 dwellings per site), but these sunlight shading issues are not a concern for smaller, separate, 1 storey homes (or 5m max height).

The MDRS calls for 3 dwellings per site of up to 3 storeys each. While I appreciate more than 1 storey has considerably more sunlight shading issues, 1 storey does not have these issues. Therefore, there is far less risk to introducing higher density of 1 storey dwellings into this zone.

Therefore, it seems unreasonable for CCC to reject the MRDS in its entirety in Residential Suburban Zone and Residential Suburban Density Transition Zones, when some of it (density) could be effectively incorporated as long as it did not impact on sunlight shading issues (caused by height).

Limiting to 1 storey would also limit the extent of intensification, so would not require such careful consideration of public transport, etc.

I seek the following decision from the Council

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

Chapter 14 Residential: 14.4.2.5 Outdoor living space

Seek Amendment

My submission is that

Regarding 14.4.2.5 Outdoor living space (Residential Suburban Zone and Residential Suburban Density Transition Zone):

I WANT CCC TO 2) To enable the option for individual outdoor living spaces to be smaller in lieu of outdoor living spaces shared or partially shared with neighbouring dwellings.

Therefore, the District Plan needs to be updated to fulfil its Objectives, e.g.

“3.3.4 Objective - Housing bottom lines and choice: b. There is a range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents, including: i. a choice in housing, types, densities and locations.”

there has indeed been a change in housing needs - many people are interested in the convenience and cheaper cost in having a larger shared greenspace, that might even include community gardens. Some “pocket neighbourhoods” or “co-housing” developments even have a shared entertainment area, so that this facility is still available as required.

Many younger people are not interested in the work required to maintain their own outdoor living space. They also do not see the benefit in a smaller area of exclusive use, when they could have a much larger

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

This becomes more clearly relevant to the MDRS in point 3) below, but in summary, the MDRS only requires outdoor living space of “Ground floor: 20 m², 3 m dimension”, and CCC has no relevant justification to not allow it, the CCC District Plan Objectives call for this diversity too, so PC14 should allow for at least a portion of outdoor living spaces should be able to be satisfied by shared greenspaces.

Another acceptable solution would be that the 20sqm outdoor living (required in the MDRS) could be required to be separate outdoor living per dwelling, but then any larger outdoor living area requirement should be allowed to be made up from shared outdoor living areas.

I seek the following decision from the Council

I WANT CCC TO 2) To enable the option for individual outdoor living spaces to be smaller in lieu of outdoor living spaces shared or partially shared with neighbouring dwellings.

Chapter 14 Residential: 14.4.2.9 Road boundary building setback

Seek Amendment

My submission is that

Regarding 14.4.2.9 Road boundary building setback (Residential Suburban Zone and Residential Suburban Density Transition Zone):

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

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

Front yard setback does not affect sunlight shading as height at that point is governed by the recession plane. Front yard setback does not affect Qualifying Matters such as “Low Public Transport Accessibility Area” or “Tsunami Management Area”, etc.

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

I seek the following decision from the Council

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

Chapter 14 Residential: 14.13 Rules — Enhanced Development Mechanism

Seek Amendment

My submission is that

Regarding 14.13.1.1 Zoning qualifying standards (Enhanced Development Mechanism):

I WANT CCC TO 1) permit Qualifying Sites to not just the Residential Suburban Density Transition Zone, but also be ANY Residential Suburban zone.

Due to the new requirements of the MRDS to increase density, I think the EDMs needs to be modified to incorporate as much of the MRDS needs as possible without compromising the CCCs Qualifying matters.

The change requested above does not compromise the CCCs Qualifying matters, as it still ensures it is close to Core Public Transport Routes, etc.

EDMs are already restricted by location in 14.13.1.4 to be close to functional services (shopping malls, Open Space Zones, Core Public Transport Routes, etc), which are far more relevant as they ensure higher functionality is available.

Therefore, there is no need to have EDMs further restricted to be in the RSDT Zone as that has no impact on the functional services available to residents.

I seek the following decision from the Council

I WANT CCC TO 1) permit Qualifying Sites to not just the Residential Suburban Density Transition Zone, but also be ANY Residential Suburban zone.

Chapter 14 Residential: 14.13 Rules — Enhanced Development Mechanism

Seek Amendment

My submission is that

Regarding 14.13.3.5 Minimum unit size, and mix of units (Enhanced Development Mechanism):

I would like CCC to eliminate or drastically reduce the net floor area requirements of Enhanced Development Mechanism homes.

The current PC14 draft by CCC needs further changes.

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

“3.3.4 Objective - Housing bottom lines and choice: b. There is a range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents, including: i. a choice in housing, types, densities and locations.”.

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

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

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

I seek the following decision from the Council

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

Chapter 14 Residential: 14.13 Rules — Enhanced Development Mechanism

Seek Amendment

My submission is that

Regarding 14.13.3.7 Outdoor living space (Enhanced Development Mechanism):

I WANT CCC TO 2) To enable the option for individual outdoor living spaces to be smaller in lieu of outdoor living spaces shared or partially shared with neighbouring dwellings.

Therefore, the District Plan needs to be updated to fulfil its Objectives, e.g.

“3.3.4 Objective - Housing bottom lines and choice: b. There is a range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents, including: i. a choice in housing, types, densities and locations.”.

there has indeed been a change in housing needs - many people are interested in the convenience and cheaper cost in having a larger shared greenspace, that might even include community gardens. Some “pocket neighbourhoods” or “co-housing” developments even have a shared entertainment area, so that this facility is still available as required.

Many younger people are not interested in the work required to maintain their own outdoor living space. They also do not see the benefit in a smaller area of exclusive use, when they could have a much larger area that is shared. Therefore, It is appreciated that not all people will want this, but that is fine - enough people want it that there should be an option available for it.

This becomes more clearly relevant to the MDRS in point 3) below, but in summary, the MDRS only requires outdoor living space of “Ground floor: 20 m², 3 m dimension”, and CCC has no relevant justification to not allow it, the CCC District Plan Objectives call for this diversity too, so PC14 should allow for at least a portion of outdoor living spaces should be able to be satisfied by shared greenspaces.

Another acceptable solution would be that the 20sqm outdoor living (required in the MDRS) could be required to be separate outdoor living per dwelling, but then any larger outdoor living area requirement should be allowed to be made up from shared outdoor living areas.

I seek the following decision from the Council

I WANT CCC TO 2) To enable the option for individual outdoor living spaces to be smaller in lieu of outdoor living spaces shared or partially shared with neighbouring dwellings.

Planning Maps: Wainoni Road: Inappropriate Qualifying Matter of “Low Public Transport Accessibility Area”

Seek Amendment

My submission is that

Regarding Planning Map for Properties from 100 to 193 Wainoni Road (and further afield):

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

Bus 80 goes down Wainoni Road (all in Residential Suburban Zone), with regular bus stops on both sides of the road. Bus 80 comes every 15 minutes (e.g. 8:18am to 8:33am weekdays), from Waimari Beach to the Central City and back (<https://www.metroinfo.co.nz/timetables/80-lincoln-parklands/>). This seems to satisfy the need to be close to public transport that links to the central city.

So it makes no sense to have a Qualifying Matter of “Low Public Transport Accessibility Area” on roads that have regular bus stops to the central city. E.g. Wainoni and Keyes Road. It makes no sense with relation to the District Plan Objectives or stated purpose of Qualifying Matters, and it is not fair when compared to nearby streets with similar or worse bus routes but have no Qualifying Matter of “Low Public Transport Accessibility Area”. Evidence given below.

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

- [38 Lyndhurst Crescent, Wainoni \(Medium Density Residential Zone\) to Cathedral Square](#) at 6pm would take 31mins on Bus 5, with 12min walk. No Qualifying Matter for Public Transport.
- [183 Wainoni Road, Avondale \(Residential Suburban Zone\) to Cathedral Square](#) at 6pm would take 25mins on Bus 80, with 1min walk. Or worst case, would take 32mins on Bus 5, with 14min walk.

For another Comparison, Pages Road (running parallel to Wainoni Road), is Medium Density Residential Zone, and is also serviced by a single Bus - Bus 5, with regular bus stops on both sides of the road. Bus 5 also comes every 13 minutes (e.g. 8:32am to 8:45am weekdays), from New Brighton to the Central City and back (<https://www.metroinfo.co.nz/timetables/5-rolleston-newbrighton/>). Bus 80 has the Qualifying Matter of “Low Public Transport Accessibility Area”, whereas Bus 5 does not have this issue, even though it is very similar to Bus 80.

I seek the following decision from the Council

I WANT CCC TO remove the Qualifying Matter of “Low Public Transport Accessibility Area” in this area from 100 to 193 Wainoni Road (and further afield), or on all roads on regular bus stops to the central city.

Planning Maps: “Water body Setback”

Seek Amendment

My submission is that

Regarding Planning Map for Properties from 135 to 185 Wainoni Road (and further afield):

I WANT CCC TO rezone this area from 135 to 185 Wainoni Road (and further afield), to “Medium Density Residential Zone” because it is less of a risk than places like Marine Parade that are “Medium Density Residential Zone” with the Qualifying Matter of “Coastal Hazard Medium Risk Management Area” applying to the whole property. Most importantly, the Qualifying Matter of “Water body Setback” only applies to a very small (5m wide) part of the properties, so should not negatively affect the whole 70m of the properties.

135 to 185 Wainoni Road (Residential Suburban Zone) have the Northern boundary back on to a very small Network Stream, that the District Plan states should have a setback of 5m. The rest of the property unaffected by this setback is typically about 65m long.

The Water body Setback does not pose much of a flooding risk, as it is intended to actually mitigate flooding risk by draining flood waters away. If there is any flood risk, it is limited to the low area beside the Network Stream, otherwise it would be marked as "Floodplain Hazard Management Area", which it is not.

Therefore, it does not seem fair to restrict all of these entire properties to Residential Suburban Zone when only 5m out of 65m is affected.

The Water body Setback is already protected by the 5m setback from the District Plan, and with good design, could be maximised and appreciated as an outdoor living greenspace, even in, or particularly in Medium Density Residential use.

NOTE: Public Transport is not a valid reason to limit 157 to 193 Wainoni Road - as addressed earlier, this area is as good or better Public Transport than existing Medium Density Residential Zones.

I seek the following decision from the Council

I WANT CCC TO rezone this area from 135 to 185 Wainoni Road (and further afield), to "Medium Density Residential Zone" because it is less of a risk than places like Marine Parade that are "Medium Density Residential Zone" with the Qualifying Matter of "Coastal Hazard Medium Risk Management Area" applying to the whole property. Most importantly, the Qualifying Matter of "Water body Setback" only applies to a very small (5m wide) part of the properties, so should not negatively affect the whole 70m of the properties.

Planning Maps: Wainoni Road: "Tsunami Management Area"

Seek Amendment

My submission is that

Regarding Planning Map for Properties from 157 to 193 Wainoni Road (and further afield):

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

Compare 157 to 193 Wainoni Road (with only a small portion being "Tsunami Management Area") to areas like Marine Parade and others that are Medium Density Residential Zone, yet they have a Qualifying Matter of "Tsunami Management Area" across the entire property, and in addition, some of them have "Coastal Hazard Medium Risk Management Area".

Evidence:

157 to 193 Wainoni Road (Residential Suburban Zone) have the Northern boundary back on to Chisnalwood School and a very minor network stream, with a small portion of the Northern boundary being lower lying. It is ONLY that small northern portion of these properties that have the Qualifying Matter of "Tsunami Management Area".

This can be proven by looking at 189 Wainoni Road that is cut in half:

- 2/189 Wainoni Road, Wainoni - this is the Northern half, and is marked with the Qualifying Matter of "Tsunami Management Area".
- 1/189 Wainoni Road, Wainoni - this is the Southern half, and is NOT marked with the Qualifying Matter of "Tsunami Management Area".

So there are at least 2 problems with this:

1. 157 to 193 Wainoni Road should be Medium Density Residential Zone, as they have less risks than existing Medium Density Residential Zones like Marine Parade and others, that not only have the risk across their whole property, but also have additional risks that 157 to 193 Wainoni Road does not have. NOTE: Public Transport is not a valid reason to limit 157 to 193 Wainoni Road - as addressed earlier, this area is as good or better Public Transport than existing Medium Density Residential Zones.
2. Entire properties like 157 to 193 Wainoni Road should not be limited to Residential Suburban Zone based on Qualifying Matters that only apply to a small portion of their properties.

I seek the following decision from the Council

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

Planning Maps: Wainoni Road: Should be MDRZ based on Enhanced Development Mechanism criteria

Seek Amendment

My submission is that

Regarding Planning Map for Properties from ~100 to ~300 Wainoni Road (and further afield):

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

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

The MDRS does not have such a good amenities list as the CCC District Plan 14.13 Enhanced Development Mechanism (EDM), which we will use as a comparison that passes on all 4 tests:

- 800 metres EDM walking distance of a supermarket: Yes, using Pak n Save Wainoni.
- 800 metres EDM walking distance of either a primary or intermediate school: Yes, using Chisnallwood Intermediate.

- 400 metres EDM walking distance of an Open Space Zone that has an area greater than 4000m²: Yes, using either Shortland Playground (6200sqm), or Wainoni Park (54,000sqm)
- 600 metres EDM walking distance of an EDM core public transport route: Yes, Bus route 80 travels down the full length of Wainoni Road (<https://www.metroinfo.co.nz/timetables/80-lincoln-parklands/>).

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

This can be compared to areas like around Niagara Street, Wainoni, which are “Medium Density Residential Zone”, but pass only 1 of the 4 EDM tests above: No close supermarket, No close school, No close Open Space Zone, has a close Bus Route.

Combined with previous issues discussed about Qualifying Matters being less than or equal to proposed “Medium Density Residential Zones”, there is a strong case that Properties from ~100 to ~300 Wainoni Road (and further afield) should also be “Medium Density Residential Zone”.

I seek the following decision from the Council

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

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

Planning Maps: Keyes Road: Inappropriate Qualifying Matter of “Low Public Transport Accessibility Area”

Seek Amendment

My submission is that

Regarding Planning Map for Properties for all of Keyes Road (and further afield):

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

Bus 60 goes down Keyes Road (most of which is in Residential Suburban Zone), with regular bus stops on both sides of the road. Bus 60 comes every 15 minutes, from New Brighton to the Central City and back (<https://www.metroinfo.co.nz/timetables/60-hillmorton-southshore/>). This seems to satisfy the need to be close to public transport that links to the central city.

So it makes no sense to have a Qualifying Matter of “Low Public Transport Accessibility Area” on roads that have regular bus stops to the central city. E.g. Wainoni and Keyes Road. It makes no sense with relation to the District Plan Objectives or stated purpose of Qualifying Matters, and it is not fair when compared to nearby streets with similar or worse bus routes but have no Qualifying Matter of “Low Public Transport Accessibility Area”. Evidence given below.

For comparison:

- [17 Tonks Street, New Brighton \(Medium Density Residential Zone\) to Cathedral Square](#) at 6pm would take 41mins on Bus 60, with 12min walk. No Qualifying Matter for Public Transport.

- [270 Keyes Road, New Brighton \(Residential Suburban Zone\) to Cathedral Square](#) at 6pm would take 31mins on Bus 60, with 1min walk. Or worst case, would take 35mins on Bus 5, with 12min walk. Both options are better than 17 Tonks Street.

For another Comparison,

Marine Parade (even North of Rawhiti Domain), is Medium Density Residential Zone, and is also serviced by a single Bus - Bus 135, with regular bus stops on both sides of the road. Bus 135 also comes much less frequently - every 60 minutes (e.g. 7:45am to 8:45am weekdays), from New Brighton to the Palms - it does NOT go to the central city

(<https://www.metroinfo.co.nz/timetables/135-new-brighton-the-palms/>).

Bus 60 has the Qualifying Matter of “Low Public Transport Accessibility Area”, whereas Bus 135 does not have this issue, even though it has far lower “Public Transport Accessibility” than Bus 80.

I seek the following decision from the Council

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

Planning Maps: Keyes Road: “Tsunami Management Area”

Seek Amendment

My submission is that

Regarding Planning Map for Properties for the Residential Suburban portion of Keyes Road (and further afield):

I WANT CCC TO 6) rezone the Residential Suburban portion of Keyes Road, to “Medium Density Residential Zone” because the Qualifying Matter of “Tsunami Management Area” is not sufficient risk by itself as it is less of a risk than places like Marine Parade and 286 to 388 Keyes Road that are “Medium Density Residential Zone” with the Qualifying Matter of “Coastal Hazard Medium Risk Management Area” applying to the whole property and also “Tsunami Management Area”.

NOTE: Public Transport is not a valid reason to limit Keyes Road - as addressed earlier, this area is as good or better Public Transport than existing Medium Density Residential Zones.

I seek the following decision from the Council

I WANT CCC TO 6) rezone the Residential Suburban portion of Keyes Road, to “Medium Density Residential Zone” because the Qualifying Matter of “Tsunami Management Area” is not sufficient risk by itself as it is less of a risk than places like Marine Parade and 286 to 388 Keyes Road that are “Medium Density Residential Zone” with the Qualifying Matter of “Coastal Hazard Medium Risk Management Area” applying to the whole property and also “Tsunami Management Area”.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 15/05/2023

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

Organisation: Waihoru Spreydon-Cashmere-

Heathcote Community Board

On behalf of:

Preferred method of contact Email

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City:

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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

Chapter 6 General Rules and Procedures **Points:** 04.1

Support

Oppose

Seek Amendment

I seek the following decision from the Council

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

My submission is that

1. Proposed Qualifying Matters

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

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

Sunlight access

Chapter 7 Transport **Points:** 04.2

- 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

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

Chapter 8 Subdivision, Development and Earthworks **Points:** 04.3

- Support
 Oppose
 Seek Amendment

I seek the following decision from the Council

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

My submission is that

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

Chapter 5 Natural Hazards **Points:** 04.4

- Support
 Oppose
 Seek Amendment

I seek the following decision from the Council

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

My submission is that

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

1. Natural Hazards

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

Attached Documents

File
PC14 WSCH Community Board

Waihoru Spreydon-Cashmere-Heathcote Community Board

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

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

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

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

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

1. Proposed Qualifying Matters

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

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

2. Low public transport accessibility

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

3. Infrastructure

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

4. Natural Hazards

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

5. Residential Character Areas

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

6. Trees

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

7. Sunlight Access

The Community Board strongly supports the changes regarding sunlight access.

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

Yours sincerely,



Callum Ward

Chairperson, Waihoru Spreydon-Cashmere-Heathcote Community Board

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 15/05/2023

First name: Stuart **Last name:** Pearson

Organisation: NZ Transport Agency

On behalf of:

Preferred method of contact Email

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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:

4. If others, make a similar submission I will consider presenting a joint case with them at the hearing (do not tick if you would not consider a joint case). Yes

Attached Documents

File

Waka Kotahi Submission - CCC MDRS - Plan change 14



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

12 May 2023

Christchurch City Council
 PO Box 73012
 Christchurch 8154

Email: engagement@ccc.govt.nz

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

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

Waka Kotahi role and responsibilities

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

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

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

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

Government Policy Statement on Land Transport

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

Waka Kotahi view on the Plan Change

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

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

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

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

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

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

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

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

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

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

Assessment of Residential Character Areas

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

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

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

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

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

Qualifying matters

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

City Spine Transport Corridor

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

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

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

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

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

Low Public Transport Accessibility Area

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

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

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

Waste Water Constraints Areas Overlay (Vacuum Sewer)

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

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

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

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

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

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

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

Noise near state highways

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

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

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

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

Address for service:

Waka Kotahi NZ Transport Agency

PO Box 1479

CHRISTCHURCH 8011

Attention: Stuart Pearson

Phone: (03) 964 2836

Email: stuart.pearson@nzta.govt.nz

Table 1 – Submission points

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

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

				<p>consideration of the matters of discretion (14.14.5.3 and 15.14.5.3). These matters of discretion require consideration of potential future use of the transport corridor, which is not primarily related to protecting amenity values.</p> <p>It is recommended that Council delete the qualifying matter in its entirety.</p>	
4	Low Public Transport Accessibility Area - Qualifying Matter	Planning Maps / Chapter 14	Oppose	<p>Waka Kotahi considers that the use of the Low Public Transport Accessibility Area qualifying matter does not achieve the intended outcomes sought by MDRS. The approach doesn't take into account alternative transport options and doesn't consider where job opportunities, education and amenities are located. It also takes a static approach to a system that is dependant on funding to operate these services and has the potential to change overtime as demand changes, where increased density can support increased public transport services.</p> <p>It is also considered that this qualifying matter does not meet the requirements under s771 of the NPS-UD.</p> <p>Waka Kotahi opposes the use of the Low Public Transport Accessibility Area as a qualifying matter and requests that this be deleted.</p>	Delete the Low Public Transport Accessibility Area overlay in the planning maps and reference to this qualifying matter in Chapter 14.
5	Waste Water Constraints Areas Overlay (Vacuum Sewer) - Qualifying Matter	Planning Maps / Chapter 8.9A	Support	<p>The intent of the Waste Water Constraints Areas Overlay (Vacuum Sewers) as a qualifying matter is generally supported. Waka Kotahi recognises the existing constraints of this waste water infrastructure and there is no capacity to support additional housing capacity in the areas where this qualifying matter applies. There is also a potential pathway where alternatives to other adjoining wastewater systems can be obtained to allow for intensification of the site.</p>	Retain as notified.
6	Safe or Efficient Operation of Nationally Significant Infrastructure (Christchurch Airport) - Qualifying Matter	Planning Maps	Support in Part	<p>Waka Kotahi supports the general intent of the qualifying matter to address effects related to noise from aircraft on residential properties, which reflects the noise rules in the District Plan. However, it is considered that the qualifying matter should not result in the downzoning of these residential properties and should be subject to MDRS provisions.</p> <p>It is recommended that the residential properties within the Airport Noise Influence Area overlay be rezoned in accordance</p>	Update the Residential Suburban Zone properties subject to the Airport Noise Influence Area to the appropriate zoning required under the MDRS.

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

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 15/05/2023

First name: Sara **Last name:** Hodgson

Organisation: Ministry of Education

On behalf of:

Preferred method of contact Email

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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

Chapter 6 General Rules and Procedures **Points:** 06.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

My submission is that

Full submission attached.

Attached Documents

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



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

Form 5

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

To: Christchurch City Council

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

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

Attention: Sara Hodgson

Phone: 03 366 3521

Email: sara.hodgson@beca.com

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

Background

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

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

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

The Ministry of Education submission is:

Objective and policies:

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

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

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

Qualifying Matters:

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

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

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

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

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

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

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

(b) the designation applies to land that—

(i) is in a relevant residential zone; or

(ii) adjoins a relevant residential zone.

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

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

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

Future school network impacts:

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

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

Decision sought:

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

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

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

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



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

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

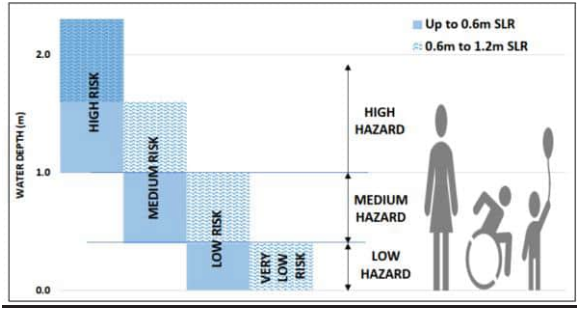
Appendix 1					
ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought
		<p><u>A. Contrasting building clusters within the cityscape and the wider perspective of the Te Poho-o-Tamatea/the Port Hills and Canterbury plains; and</u></p> <p><u>B. Appropriate scale, form and location of buildings when viewed in context of the city's natural environment and significant open spaces, providing for:</u></p> <p style="padding-left: 40px;"><u>I. Larger scale development where it can be visually absorbed within the environment; and</u></p> <p style="padding-left: 40px;"><u>II. Lower heights and design controls for development located in more sensitive environments;</u></p> <p><u>C. The pre-eminence of the city centre built form, supported by enabling the highest buildings;</u></p> <p><u>D. The clustering, scale and massing of development in and around commercial centres, commensurate with the role of the centre and the extent of commercial and community services provided;</u></p>			<p><u>i. Within commercial and residential zones, a distinctive, legible urban form and strong sense of place, expressed through:</u></p> <p style="padding-left: 40px;"><u>A. Contrasting building clusters within the cityscape and the wider perspective of the Te Poho-o-Tamatea/the Port Hills and Canterbury plains; and</u></p> <p style="padding-left: 40px;"><u>B. Appropriate scale, form and location of buildings when viewed in context of the city's natural environment and significant open spaces, providing for:</u></p> <p style="padding-left: 80px;"><u>I. Larger scale development where it can be visually absorbed within the environment; and</u></p> <p style="padding-left: 80px;"><u>II. Lower heights and design controls for development located in more sensitive environments;</u></p> <p style="padding-left: 40px;"><u>C. The pre-eminence of the city centre built form, supported by enabling the highest buildings;</u></p> <p style="padding-left: 40px;"><u>D. The clustering, scale and massing of development in and around commercial centres, commensurate with the role of the centre and the extent of commercial and community services provided</u></p> <p style="padding-left: 40px;"><u>E. The largest scale and density of development, outside of the city centre, provided within and around town centres, and lessening scale for centres lower in the hierarchy;</u></p>

Appendix 1					
ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought
		<p><u>E. The largest scale and density of development, outside of the city centre, provided within and around town centres, and lessening scale for centres lower in the hierarchy;</u></p> <p><u>ii. Development and change over time, including amenity values, in response to the diverse and changing needs of people, communities and future generations;</u></p> <p><u>iii. The cultural traditions and norms of Ngāi Tahu manawhenua; and</u></p> <p><u>iv. The benefits of urban environments that support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.</u></p>			<p><u>ii. Development and change over time, including amenity values, in response to the diverse and changing needs of people, communities and future generations;</u></p> <p><u>iii. The cultural traditions and norms of Ngāi Tahu manawhenua; and</u></p> <p><u>iv. The benefits of urban environments that support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.</u></p> <p><u>v. Provides for educational facilities throughout the districts to support communities and development.</u></p>
03	3.3.7.8	<p>Objective – Urban growth, form and design</p> <p>a. A well-integrated pattern of development and infrastructure, a consolidated urban form, and a high quality urban environment that:</p> <p>i. Is attractive to residents, business and visitors; and</p> <p>ii. Has its areas of special character and amenity value identified and their specifically recognised values appropriately managed; and</p>	Support in part	<p>The Ministry requests that explicit provision is given to educational facilities throughout the district in urban development, to manage the impacts of development on educational facilities, in particular impacts on school capacity.</p> <p>Council has an obligation under the National Policy</p>	<p>Amend as follows:</p> <p>Objective – Urban growth, form and design</p> <p>a. A well-integrated pattern of development and infrastructure, a consolidated urban form, and a high quality urban environment that:</p> <p>i. Is attractive to residents, business and visitors; and</p> <p>ii. Has its areas of special character and amenity value identified and their specifically recognised values appropriately managed; and</p>

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

Appendix 1					
ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought
		<p>v. Maintains and enhances the Central City, Key Activity Centres and Neighbourhood Centres, Town centres, and Local centres as community focal points; and</p> <p>vi. Identifies opportunities for, and supports, the redevelopment of brownfield sites for residential, business or mixed use activities; and</p> <p>vii. Promotes the re-use and re-development of buildings and land; and</p> <p>viii. Has good Improves overall accessibility and connectivity <u>(including through opportunities for walking, cycling and public transport) for people between housing, jobs, community services, natural spaces, and open space, transport (including opportunities for walking, cycling and public transport) and services; and</u></p> <p>ix. Promotes the safe, efficient and effective provision and use of infrastructure, including the optimisation of the use of existing infrastructure; and</p> <p>x. Co-ordinates the nature, timing and sequencing of new development with the funding, implementation and operation of necessary transport and other infrastructure</p>			<p>vi. Identifies opportunities for, and supports, the redevelopment of brownfield sites for residential, business or mixed use activities; and</p> <p>vii. Promotes the re-use and re-development of buildings and land; and</p> <p>viii. Has good Improves overall accessibility and connectivity <u>(including through opportunities for walking, cycling and public transport) for people between housing, jobs, community services, natural spaces, educational facilities and open space, transport (including opportunities for walking, cycling and public transport) and services; and</u></p> <p>ix. Promotes the safe, efficient and effective provision and use of infrastructure, including the optimisation of the use of existing infrastructure; and</p> <p>x. Co-ordinates the nature, timing and sequencing of new development with the funding, implementation and operation of necessary transport and other infrastructure</p> <p>xi. Provides for educational facilities throughout the districts to support communities and development.</p>
Chapter 5 – Natural Hazards					

Appendix 1																																			
ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought																														
04	5.2.2.5.1	<p><u>Policy – Managing development in Qualifying Matter Coastal Hazard Management Areas</u></p> <p>a. <u>Within the following Qualifying Matters, development, subdivision and land use that would provide for intensification of any site shall be avoided, unless the risk is from coastal inundation and a site specific assessment demonstrates the risk is low or very low based on thresholds defined in Table 5.2.2.5.1a below:</u></p> <p><u>Coastal Hazard High Risk Management Area;</u></p> <p><u>Coastal Hazard Medium Risk Management Area.</u></p> <p><small>Table 5.2.2.5.1a thresholds for coastal inundation</small></p> <table border="1"> <thead> <tr> <th>Coastal inundation risk category</th> <th>Flood depth based on 0.6m of sea level rise (higher certainty)</th> <th>Flood depths based on 1.2m of sea level rise (less certainty – higher consequence)</th> </tr> </thead> <tbody> <tr> <td>Very low</td> <td>Dry</td> <td>d < 0.4m</td> </tr> <tr> <td>Low</td> <td>d < 0.4m</td> <td>0.4m < d < 1.0m</td> </tr> <tr> <td>Medium</td> <td>0.4m < d < 1.0m</td> <td>d > 1.0m</td> </tr> <tr> <td>High</td> <td>d > 1.0m</td> <td>d > 1.6m</td> </tr> </tbody> </table> <p><small>Note - d represents the depth of coastal flooding in a flood event, which factors in the sea level amount considered i.e. 0.6m of sea level rise does not equate to 0.6m of flooding.</small></p>	Coastal inundation risk category	Flood depth based on 0.6m of sea level rise (higher certainty)	Flood depths based on 1.2m of sea level rise (less certainty – higher consequence)	Very low	Dry	d < 0.4m	Low	d < 0.4m	0.4m < d < 1.0m	Medium	0.4m < d < 1.0m	d > 1.0m	High	d > 1.0m	d > 1.6m	Support in part	The Ministry has an operational need to maintain existing, and in some cases establish new educational facilities in Qualifying Matter Coastal Hazard Areas to provide social infrastructure for existing communities in areas susceptible to coastal hazards. The Ministry acknowledges the risk associated with coastal hazards and considers that the policy as drafted enables development and land use with appropriate regard to property and human life.	<p>Amend as follows:</p> <p><u>Policy – Managing development in Qualifying Matter Coastal Hazard Management Areas</u></p> <p>a. <u>Within the following Qualifying Matters, development, subdivision and land use that would provide for intensification of any site shall be avoided, unless the risk is from coastal inundation and a site specific assessment demonstrates the risk is low or very low based on thresholds defined in Table 5.2.2.5.1a below:</u></p> <p><u>Coastal Hazard High Risk Management Area;</u></p> <p><u>Coastal Hazard Medium Risk Management Area.</u></p> <p><small>Table 5.2.2.5.1a thresholds for coastal inundation</small></p> <table border="1"> <thead> <tr> <th>Coastal inundation risk category</th> <th>Flood depth based on 0.6m of sea level rise (higher certainty)</th> <th>Flood depths based on 1.2m of sea level rise (less certainty – higher consequence)</th> </tr> </thead> <tbody> <tr> <td>Very low</td> <td>Dry</td> <td>d < 0.4m</td> </tr> <tr> <td>Low</td> <td>d < 0.4m</td> <td>0.4m < d < 1.0m</td> </tr> <tr> <td>Medium</td> <td>0.4m < d < 1.0m</td> <td>d > 1.0m</td> </tr> <tr> <td>High</td> <td>d > 1.0m</td> <td>d > 1.6m</td> </tr> </tbody> </table> <p><small>Note - d represents the depth of coastal flooding in a flood event, which factors in the sea level amount considered i.e. 0.6m of sea level rise does not equate to 0.6m of flooding.</small></p>	Coastal inundation risk category	Flood depth based on 0.6m of sea level rise (higher certainty)	Flood depths based on 1.2m of sea level rise (less certainty – higher consequence)	Very low	Dry	d < 0.4m	Low	d < 0.4m	0.4m < d < 1.0m	Medium	0.4m < d < 1.0m	d > 1.0m	High	d > 1.0m	d > 1.6m
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Appendix 1					
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		<p>b. Replacement <u>buildings, accessory buildings and extensions/additions to buildings</u> are enabled where effects are mitigated to an acceptable level based on a <u>site specific assessment</u>, and having regard to the level and timing of the hazard. This could be by use of an <u>appropriate risk based trigger or alternative methods</u>.</p>			 <p>b. Replacement <u>buildings, accessory buildings and extensions/additions to buildings</u> are enabled where effects are mitigated to an acceptable level based on a <u>site specific assessment</u>, and having regard to the level and timing of the hazard. This could be by use of an <u>appropriate risk based trigger or alternative methods</u>.</p> <p>c. Educational facilities are enabled, where there is an operational need and effects are mitigated to an acceptable level based on a <u>site specific assessment</u>, and having regard to the level and timing of the hazard. This could be by use of an <u>appropriate risk based trigger or alternative methods</u>.</p>
05	<u>5.2.2.5.2</u>	<p><u>Policy – Managing development within Qualifying Matter Tsunami Management Area</u></p> <p>a. <u>Within the Tsunami Management Area Qualifying Matter, avoid development, subdivision and land use that would provide for intensification of any site, unless the risk to life and property is acceptable.</u></p>	Neutral	The Ministry has an operational need to maintain existing, and in some cases establish new educational facilities in Qualifying Matter Tsunami Management Area to provide social	Retain as drafted.

Appendix 1					
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				infrastructure for existing communities in areas. The Ministry accepts that such facilities should not be provided for if the risk to life and property is considered unacceptable.	
06	<u>5.4A.2</u>	<p><u>Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area</u></p> <p><u>5.4A.2 Controlled activities</u></p> <p><u>a. The activities listed below are controlled activities.</u></p> <p>a. <u>mitigation of the potential adverse effects from coastal hazards.</u></p> <p>b. <u>Setting of minimum floor levels to mitigate the effects of inundation.</u></p> <p>c. <u>There is adequate provision for the timely relocation or removal of buildings and structures, or cessation of activity, and remediation of the site, and mechanisms to ensure this occurs, if considered necessary due to the level of risk.</u></p>	Support	<p>The Ministry recognises the risk that natural hazards pose to school age children and supports methods to ensure new developments have measures in place to mitigate the risk of coastal inundation.</p> <p>A number of schools are located within the Coastal Hazard Management Area including New Brighton South, Redcliffs School, New Brighton Catholic School, Our Lady Star of the Sea, Sumner School, Ko Taku Reo – Deaf Education New Zealand.</p>	Retain as drafted.

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

Appendix 1					
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		<p>d. <u>Whether there is adequate provision for the timely relocation or removal of buildings and structures, or cessation of activity, and remediation of the site, and mechanisms to ensure this occurs, if considered necessary due to the level of risk.</u></p>			
08	5.4A.4	<p><u>Discretionary activities</u></p> <p>a. <u>The activities listed below are discretionary activities.</u></p> <p><u>Activity</u></p> <p><u>D1:</u></p> <p>a. <u>The addition of a new building, other than the construction of accessory buildings, extensions/additions to existing buildings, and the replacement of an existing building, located in the area shown on the planning maps as Qualifying Matter Coastal Hazard Medium Risk Management Area</u></p>	Support	The Ministry acknowledges the risk that natural hazards pose a potential risk to the safety of children and to their assets, however recognises that at times there is a operational need to locate within these areas, particularly to serve existing communities. Where there is a medium risk, discretionary activity status is considered to be appropriate.	Retain as proposed.
09	5.4A.5	<p><u>Non-complying activities</u></p> <p>a. <u>The activities listed below are non-complying activities.</u></p> <p><u>NC1</u></p> <p>a. <u>The addition of a building, other than the construction of accessory buildings, extensions/additions to existing</u></p>	Neutral	The Ministry acknowledges the risk that natural hazards pose a potential risk to the safety of children and to their assets, however recognises that at times	Retain as proposed.

Appendix 1					
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		<u>buildings, and the replacement of an existing building, located in the area shown on the planning maps as Qualifying Matter Coastal Hazard High Risk Management Area.</u>		there is a operational need to locate within these areas, particularly to serve existing communities. Where there is a high risk, non-complying activity status is considered to be appropriate given the users of educational facilities are often vulnerable members of the community.	
Chapter 7 – Transport					
10	<u>7.2.1.9</u>	<p><u>Policy - Pedestrian Access</u></p> <p><u>a. Pedestrian access is designed to:</u></p> <p><u>i. be of a sufficient width and grade that the pedestrian access meets the access requirements of all users, including persons with a disability or with limited mobility;</u></p> <p><u>ii. have a surface treatment that provides for all weather access; and</u></p> <p><u>iii. where required for consistency with Crime Prevention Through Environmental Design (CPTED), have sufficient illumination to provide for the safety of users after dark.</u></p> <p>Advice note:</p>	Support	The Ministry is supportive of providing pedestrian access and CPTED principles as it seeks to achieve a safe and secure environment for pedestrians.	Retain as proposed.

Appendix 1					
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		1. <u>Policy 7.2.1.9 also achieves Objectives 7.2.2 and 14.2.4</u>			
Chapter 8 – Subdivision					
11	8.2.3.2	<p>Policy - Availability, provision and design of, and connections to, infrastructure</p> <p>a. Manage the subdivision and development of land to ensure development resulting from the creation of additional allotments:</p> <p style="padding-left: 40px;">i. does not occur in areas where infrastructure is not performing, serviceable or functional; and</p> <p style="padding-left: 40px;">ii. will be appropriately connected to and adequately serviced by infrastructure, including through any required upgrade to existing infrastructure.</p> <p>b. Ensure that new network infrastructure provided in relation to, or as part of, subdivision and development is constructed, designed and located so that it is resilient to disruption from significant seismic or other natural events including by ensuring that, as far as practicable, damage from such events is minimised.</p> <p>c. Ensure that, as part of subdivision and development, there is adequate provision, with sufficient capacity, to service the scale and nature of anticipated land uses resulting from the subdivision or development, for:</p> <p style="padding-left: 40px;">i. wastewater disposal, including lawful trade waste disposal for anticipated industrial development, consistent with maintaining public health and minimising adverse effects on the environment;</p>	Support In part	The Ministry support this objective as it enables subdivision, however the Ministry requests that specific provision for additional infrastructure, which includes educational facilities, is provided to ensure that population growth and the impact on schools is considered within developments.	<p>Amend as follows:</p> <p>Availability, provision and design of, and connections to, infrastructure</p> <p>a. Manage the subdivision and development of land to ensure development resulting from the creation of additional allotments:</p> <p style="padding-left: 40px;">i. does not occur in areas where infrastructure is not performing, serviceable or functional; and</p> <p style="padding-left: 40px;">ii. will be appropriately connected to and adequately serviced by infrastructure, including through any required upgrade to existing infrastructure; and</p> <p style="padding-left: 40px;">iii. Is supported by additional infrastructure as defined by the National Policy Statement for Urban Development (NPS-UD).</p> <p>b. Ensure that new network infrastructure provided in relation to, or as part of, subdivision and development is constructed, designed and located so that it is resilient to disruption from significant seismic or other natural events including by ensuring that, as far as practicable, damage from such events is minimised.</p> <p>c. Ensure that, as part of subdivision and development, there is adequate provision, with sufficient capacity, to service the scale and nature of anticipated land uses resulting from the subdivision or development, for:</p> <p style="padding-left: 40px;">i. wastewater disposal, including lawful trade waste disposal for anticipated industrial development, consistent with maintaining public health and minimising adverse effects on the environment;</p>

Appendix 1					
ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought
		<p>ii. water supply, including water of a potable standard for human consumption, and water for fire fighting purposes;</p> <p>ii. telecommunication services including connection to a telecommunication system, with new lines being generally underground in new urban areas; and</p> <p>iii. electric power supply, with new lines being generally underground in new urban areas - including, if necessary, ensuring the provision of new or additional or the upgrading of existing infrastructure in a manner that is appropriate for the amenities of the area.</p> <p>d. Where wastewater disposal is to a reticulated system, ensure all new allotments are provided with a means of connection to the system.</p> <p>e. Where a reticulated wastewater system is not available, ensure appropriate onsite or standalone communal treatment systems are installed.</p> <p>f. Promote use of appropriate on-site measures to manage the effects of trade wastes and reduce peak flows and loading on wastewater systems.</p> <p><u>g. Where subdivision, use or development occurs in the waste water constraint areas, and it is proposed to connect to the vacuum sewer, demonstrate that there is no increase in wastewater volumes from the site as a result or, where there is an increase in wastewater volumes when compared to existing wastewater volumes from the site, there is sufficient capacity in the existing vacuum sewer system to accommodate the additional wastewater flows</u></p>			<p>ii. water supply, including water of a potable standard for human consumption, and water for fire fighting purposes;</p> <p>iv. telecommunication services including connection to a telecommunication system, with new lines being generally underground in new urban areas; and</p> <p>v. electric power supply, with new lines being generally underground in new urban areas - including, if necessary, ensuring the provision of new or additional or the upgrading of existing infrastructure in a manner that is appropriate for the amenities of the area.</p> <p>d. Where wastewater disposal is to a reticulated system, ensure all new allotments are provided with a means of connection to the system.</p> <p>e. Where a reticulated wastewater system is not available, ensure appropriate onsite or standalone communal treatment systems are installed.</p> <p>f. Promote use of appropriate on-site measures to manage the effects of trade wastes and reduce peak flows and loading on wastewater systems.</p> <p><u>g. Where subdivision, use or development occurs in the waste water constraint areas, and it is proposed to connect to the vacuum sewer, demonstrate that there is no increase in wastewater volumes from the site as a result or, where there is an increase in wastewater volumes when compared to existing wastewater volumes from the site, there is sufficient capacity in the existing vacuum sewer system to accommodate the additional wastewater flows</u></p>

Appendix 1					
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12	8.7.4.3 MOD	<p>Servicing and infrastructure</p> <p>a. Whether each allotment has appropriate servicing and connections to water supply, wastewater disposal, stormwater management systems and other services; whether it is necessary to provide or upgrade services or utilities to enable the allotment to be serviced, and whether the design, location, capacity, type and construction of services and infrastructure, including the suitability of the proposed water supply for fire-fighting purposes, and any required infrastructure upgrades, are acceptable to the Council.</p> <p>b. Whether the electricity and telecommunications supply and connection to any new allotment(s) are appropriate and provide adequate capacity, including whether it is appropriate to require additional space for future connections or technology and whether any ducting or easements are required to achieve connection.</p> <p>c. Whether appropriate provision is made for onsite storm water treatment or connection to a catchment based treatment network.</p> <p>d. Outside the Central City, the contribution of proposals towards the development of an integrated naturalised surface water network of soil absorption, sedimentation and detention basins, wet-ponds, swales and/or wetlands to treat and manage surface water and avoid (where practicable) a proliferation of smaller facilities.</p> <p>e. Outside the Central City, the extent to which the construction or erection of utilities for servicing a site incorporate and/or plant appropriate indigenous vegetation.</p> <p>f. Outside the Central City, whether any proposed ponding area will be attractive to birdlife that might pose a birdstrike risk to the operation of Christchurch International Airport Limited.</p>	Support in part	The Ministry requests that specific provision for additional infrastructure, which includes educational facilities, is provided to ensure that population growth and the impact on schools is considered within developments.	<p>Servicing and infrastructure</p> <p>a. Whether each allotment has appropriate servicing and connections to water supply, wastewater disposal, stormwater management systems and other services; whether it is necessary to provide or upgrade services or utilities to enable the allotment to be serviced, and whether the design, location, capacity, type and construction of services and infrastructure, including the suitability of the proposed water supply for fire-fighting purposes, and any required infrastructure upgrades, are acceptable to the Council.</p> <p>b. Whether the electricity and telecommunications supply and connection to any new allotment(s) are appropriate and provide adequate capacity, including whether it is appropriate to require additional space for future connections or technology and whether any ducting or easements are required to achieve connection.</p> <p>c. Whether appropriate provision is made for onsite storm water treatment or connection to a catchment based treatment network.</p> <p>d. Outside the Central City, the contribution of proposals towards the development of an integrated naturalised surface water network of soil absorption, sedimentation and detention basins, wet-ponds, swales and/or wetlands to treat and manage surface water and avoid (where practicable) a proliferation of smaller facilities.</p> <p>e. Outside the Central City, the extent to which the construction or erection of utilities for servicing a site incorporate and/or plant appropriate indigenous vegetation.</p> <p>f. Outside the Central City, whether any proposed ponding area will be attractive to birdlife that might pose a birdstrike risk to the operation of Christchurch International Airport Limited.</p> <p>g. Outside the Central City, where wastewater capacity is close to reaching a limit, whether to reduce the lapsing period of the subdivision consent below five years to enable that capacity to be utilised by others if the development opportunity that is the subject of the consent is not implemented.</p>

Appendix 1					
ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought
		<p>g. Outside the Central City, where wastewater capacity is close to reaching a limit, whether to reduce the lapsing period of the subdivision consent below five years to enable that capacity to be utilised by others if the development opportunity that is the subject of the consent is not implemented.</p> <p>h. The ability for maintenance, inspection and upgrade of utilities and infrastructure occur, including ensuring continued access for the same.</p> <p>i. The extent to which the design will minimise risk or injury and/or property damage from utilities or infrastructure.</p> <p>j. The extent to which potential adverse effects of electricity lines, including visual impacts, are mitigated, for example through the location of building platforms and landscape design.</p> <p>k. The suitability of the proposed water supply for fire-fighting purposes (the Council may obtain a report from the Chief Fire Officer), including the extent of compliance with SNZ PAS:4509:2008 in respect of the health and safety of the community, including neighbouring properties.</p> <p>l. The extent to which conditions are appropriate on a subdivision consent in a Residential New Neighbourhood Future Urban Zone in order to give effect to the development requirements specified in the relevant outline development plan.</p> <p>m. In zones other than the Residential New Neighbourhood Future Urban Zone, the extent to which a development needs to comply with any flexible element of an outline development plan, including for phasing or location of infrastructure; and consideration of the effects of the movement of any elements on other landowners of land located within or adjacent to the outline development plan area, or on the safe, efficient or effective operation of infrastructure.</p>			<p>h. The ability for maintenance, inspection and upgrade of utilities and infrastructure occur, including ensuring continued access for the same.</p> <p>i. The extent to which the design will minimise risk or injury and/or property damage from utilities or infrastructure.</p> <p>j. The extent to which potential adverse effects of electricity lines, including visual impacts, are mitigated, for example through the location of building platforms and landscape design.</p> <p>k. The suitability of the proposed water supply for fire-fighting purposes (the Council may obtain a report from the Chief Fire Officer), including the extent of compliance with SNZ PAS:4509:2008 in respect of the health and safety of the community, including neighbouring properties.</p> <p>l. The extent to which conditions are appropriate on a subdivision consent in a Residential New Neighbourhood Future Urban Zone in order to give effect to the development requirements specified in the relevant outline development plan.</p> <p>m. In zones other than the Residential New Neighbourhood Future Urban Zone, the extent to which a development needs to comply with any flexible element of an outline development plan, including for phasing or location of infrastructure; and consideration of the effects of the movement of any elements on other landowners of land located within or adjacent to the outline development plan area, or on the safe, efficient or effective operation of infrastructure.</p> <p>n. Within the Lyttelton Port Influences Overlay, the imposition of an appropriate, volunteered condition prohibiting noise sensitive activities on the allotments, to be complied with on a continuing basis, for the purpose of incorporation into a consent notice to be issued by the Council.</p> <p>o. Whether wastewater disposal and stormwater management systems recognise the cultural significance of Ngā Wai sites of Ngāi Tahu cultural significance identified in Schedule 9.5.6.4, and do not create additional demand to discharge directly to Ngā Wai.</p>

Appendix 1					
ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought
		<p>n. Within the Lyttelton Port Influences Overlay, the imposition of an appropriate, volunteered condition prohibiting noise sensitive activities on the allotments, to be complied with on a continuing basis, for the purpose of incorporation into a consent notice to be issued by the Council.</p> <p>o. Whether wastewater disposal and stormwater management systems recognise the cultural significance of Ngā Wai sites of Ngāi Tahu cultural significance identified in Schedule 9.5.6.4, and do not create additional demand to discharge directly to Ngā Wai.</p>			<p>p. Whether the development is supported by additional infrastructure as defined by the National Policy Statement for Urban Development (NPS-UD).</p>
Chapter 13 – Specific Purpose Zones – School					
13	13.6.4.1.3 RD5	<p>a. For schools within High Density Residential zones, (within Town Centre and Large Local Centre Intensification Precincts or within Residential Precincts), any building between 14 and 20 metres in height, when the following standards are met:</p> <p>i. The building shall have a maximum height of 20 metres at 10 metres from a road boundary or internal boundary; and</p> <p>ii. The building shall either:</p> <p>a. Not exceed 30m in continuous building length, or</p> <p>b. Provide a recess for every additional 30m of building length or part thereof, with a minimum</p>	Support in part	The Ministry support the intent of this rule however considers there is a drafting error in the wording. The rule refers to schools <u>within</u> High Residential Density zones, however where schools are zoned Specific Purpose School zone they are not within an alternate residential zone, rather adjoin it. In some cases, a school which is zoned Specific Purpose School zone may adjoin two residential	<p>Amend as follows:</p> <p>a. For schools within adjoining the High Density Residential zones, (within Town Centre and Large Local Centre Intensification Precincts or within Residential Precincts), any building between 14 and 20 metres in height, when the following standards are met:</p> <p>i. The building shall have a maximum height of 20 metres at 10 metres from a road boundary or internal boundary; and</p> <p>ii. The building shall either:</p> <p>a. Not exceed 30m in continuous building length, or</p> <p>b. Provide a recess for every additional 30m of building length or part thereof, with a minimum dimension of 4</p>

Appendix 1					
ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/ New Provision	Reason for Submission	Relief Sought
		<p>dimension of 4 metres in length and 2 metres deep, for the full height of the building including the roof.</p> <p>b. i. For schools within the High Density Residential zone (outside of Residential Precincts), standard a. ii. In RD5 also applies; and</p> <p>ii. The maximum height shall be 32 metres at 10 metres from a road or internal boundary.</p>		<p>zones and the current wording would give rise to confusion regarding what rules apply.</p> <p>As such, the Ministry requests an amendment to the wording from 'within' to 'adjoining'</p>	<p>metres in length and 2 metres deep, for the full height of the building including the roof.</p> <p>b. i. For schools within the High Density Residential zone (outside of Residential Precincts), standard a. ii. In RD5 also applies; and</p> <p>ii. The maximum height shall be 32 metres at 10 metres from a road or internal boundary</p>
14	13.6.4.2.2 ii.	<p><u>Height in relation to boundary</u></p> <p>a. No part of any building shall project beyond a building envelope contained by:</p> <p>ii. High Density Residential (both within and outside of Intensification or Residential Precincts):</p> <p>There shall be no recession plane above 14 metres in height if the building is set back 10 metres or more from a boundary with a residential zone.</p>	Support in part	<p>The Ministry support the intent of this rule however considers there is a drafting error in the wording. The rule refers to schools <u>within</u> High Residential Density zones, however where schools are zoned Specific Purpose School zone they are not within an alternate residential zone, rather adjoin it. In some cases, a school which is zoned Specific Purpose zone may adjoin two residential zones and the current wording would give rise to confusion</p>	<p>Amend as follows:</p> <p><u>Height in relation to boundary</u></p> <p>a. No part of any building shall project beyond a building envelope contained by:</p> <p>ii. sites adjoining the High Density Residential (both within and outside of Intensification or Residential Precincts):</p> <p>There shall be no recession plane above 14 metres in height if the building is set back 10 metres or more from a boundary with a residential zone.</p>

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

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

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

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

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

ENDS

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 15/05/2023

First name: Howard **Last name:** Pegram

On behalf of:

Preferred method of contact: Postal

Postal address: 221A Centaurus Road

Suburb: Saint Martins

City: Christchurch

Country: New Zealand

Postcode: 8022

Daytime Phone: 033322535

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

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

Note to person making submission:

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

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

Yes

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

Consultation Document Submissions

Chapter 6 General Rules and Procedures **Points:** 07.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

My submission is that

Detailed submission attached.

Sunlight access.

Attached Documents

File
Howard Pegram PC14 submission

Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

Gender: Male Female Non-binary/another gender

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

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

* Required information

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

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

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

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

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

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

(a) adversely affects the environment, and

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

Yes No

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

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

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

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

I do not wish to speak.

Joint submissions (Please tick this box if you agree)

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

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

Yes, I have attached extra sheets.

No, I have not attached extra sheets.

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

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

Signature Howard Pegram

Date 30 APRIL, 2023.

Have your say

Housing and Business Choice Plan Change 14

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

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

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

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

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

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

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

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

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

Sheet 3 of 9.

Speical Health Warning Note:-

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

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

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

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

Continued ...

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

Speical Heath Warning Note continued:

Sheet 4 of 9

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

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

Enclosed Drawing:

Sheet 5 of 9.

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

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

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

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

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

Continued...

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

Enclosed Drawing note continued:

Sheet 6 of 9.

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

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

Sheet 8 of 9.

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

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

This situation is totally unacceptable and is inhumane too!

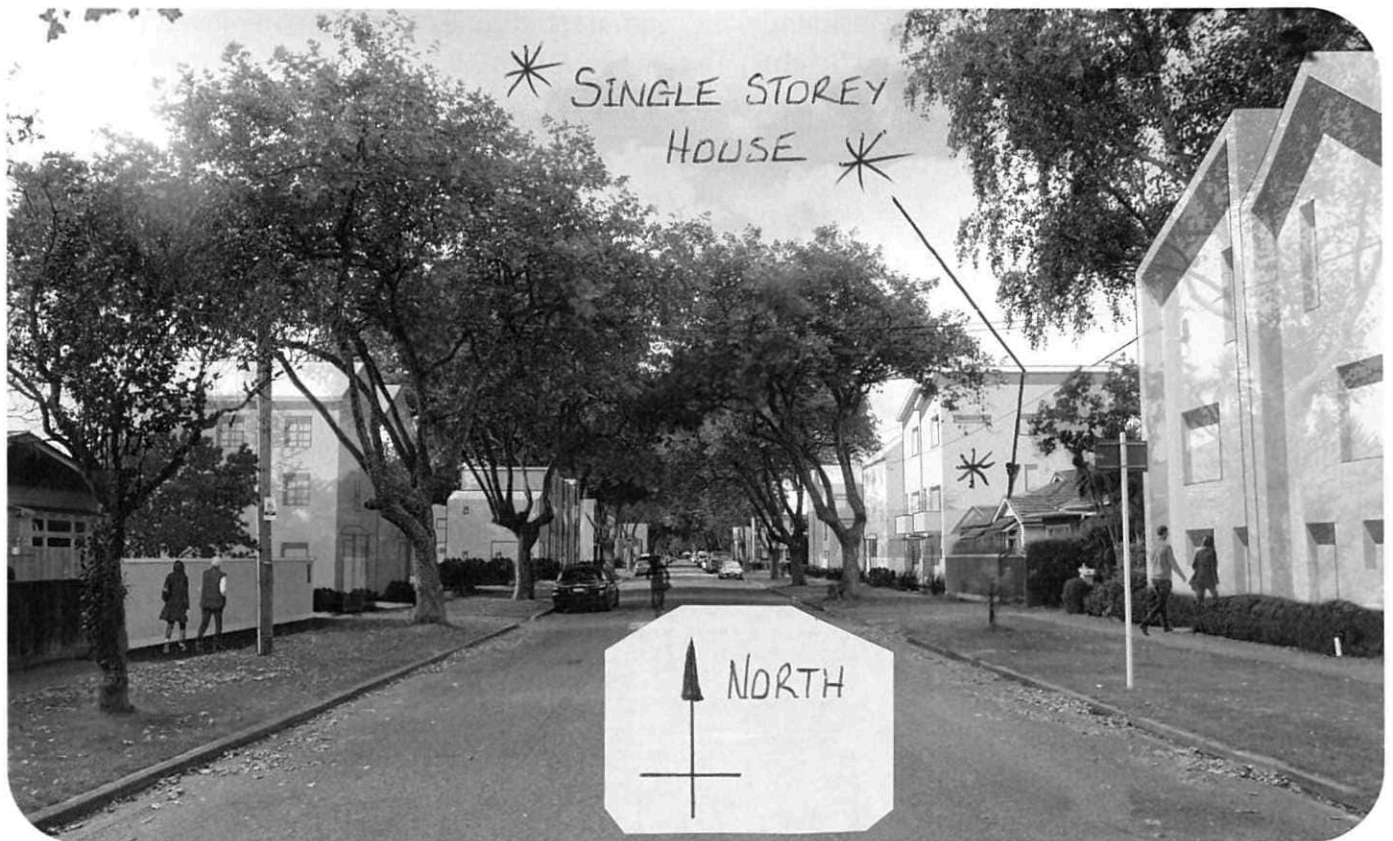
Thank you for reading and considering my notes and submission.

Yours faithfully,
Howard Pegram.

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

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

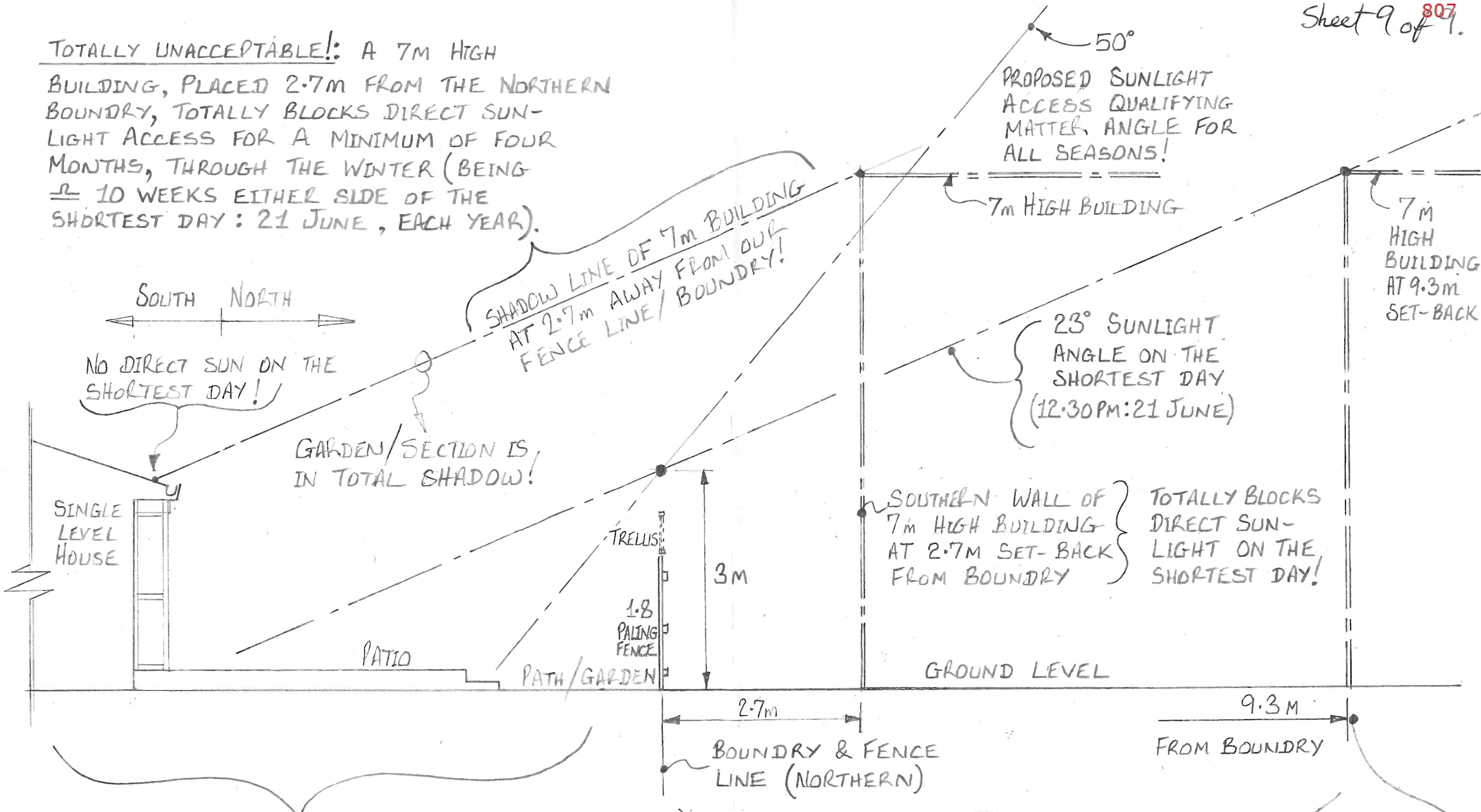
The indicative illustrations (on page 10 of the booklet) are helpful too. In the Medium-Density illustration (attached below), it shows a mix of



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

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

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



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

VACANT LAND AT 67 NAGIO STREET.

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

DRAWING SCALE : 2CM = 1M.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 15/05/2023

First name: Josh **Last name:** Garmonsway

On behalf of:

Preferred method of contact

Postal address: 89 Balrudry Street

Suburb:

City:

Country: New Zealand

Postcode: 8042

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.

Attached Documents

File
Josh

Robson, Gina

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

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

Form Summary

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

Form Summary

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

Chapter 14 - Low Public Transport Accessibility Area Qualifying Matter

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

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

Chapter 14 - Sunlight Access Qualifying Matter

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

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

Chapter 14 - High-Density Residential Zone

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

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

Form Summary

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

Any other comments?

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

Entry ID: 186

Referrer: (no referrer)

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

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Scenic Hotel Group Limited **Last name:** Scenic Hotel Group Limited

Organisation: Scenic Hotel Group Limited

On behalf of:

Preferred method of contact Email

Postal address: PO Box 35

Suburb:

City: Christchurch

Country: New Zealand

Postcode: 8140

Email: anita@townplanning.co.nz

Daytime Phone: 021 568 335

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

Attached Documents

File

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

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

To: **Christchurch District Council**

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

Background

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

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

Introduction

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

Table 1 Legal description and Records of Title

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

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

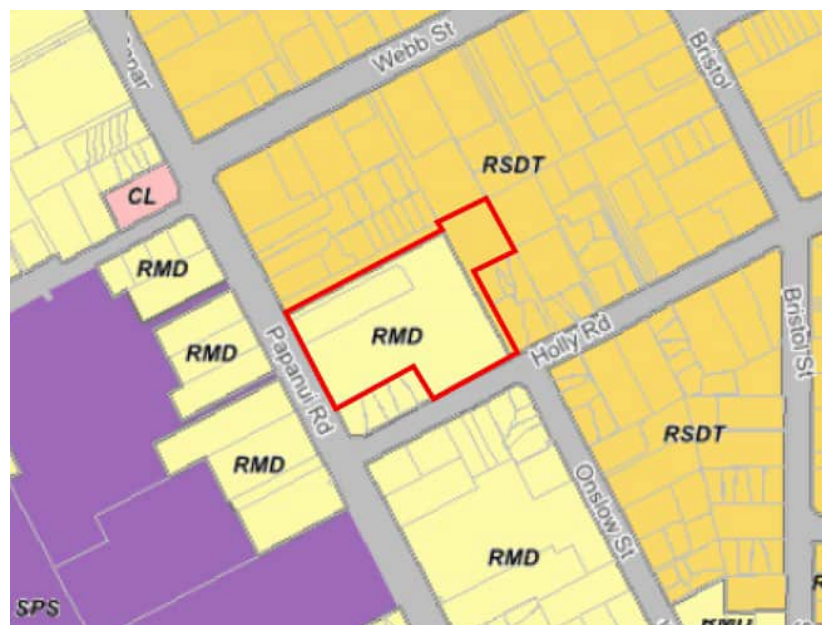


Figure 1 Location of the properties with operative District Plan zoning illustrated (CCC District Plan).

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

Specific provisions of the plan change that this submission relates to

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

Submission

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

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

¹ Source: Council Planning Maps website

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

Relief Sought

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

Other

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

DATED 12 May 2023



pp. _____

Scenic Hotel Group Limited

Address for Service: Town Planning Group
PO Box 35
Christchurch

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

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Regulus Property Investments Limited **Last name:** Regulus Property Investments Limited

Organisation: Regulus Property Investments

Limited

On behalf of:

Preferred method of contact Email

Postal address: PO Box 35

Suburb:

City: Christchurch

Country: New Zealand

Postcode: 8140

Email: anita@townplanning.co.nz

Daytime Phone: 021 568 335

I could not

Gain an advantage in trade competition through this submission

I am not

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

a. adversely affects the environment, and

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

Note to person making submission:

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

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

Yes

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

Additional requirements for hearing:

Attached Documents

File

Plan Change 14 Submission-149 Waimairi Road-FINAL

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

To: **Christchurch District Council**

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

Background

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

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

Introduction

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



Figure 1 Site location (Christchurch Operative District Plan Maps)

Specific provisions of the plan change that this submission relates to

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

Submission

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

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

Relief sought

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

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

Other

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

DATED 12 May 2023



pp. _____

Regulus Property Investments Limited

Address for Service: Town Planning Group
PO Box 35
Christchurch

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

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Luke **Last name:** Hinchey

Organisation: Retirement Villages Association
of New Zealand Inc

On behalf of:

Preferred method of contact Email

Postal address: 15 Customs Street West

Suburb: Auckland Central

City: Auckland

Country: New Zealand

Postcode: 1010

Email: luke.hinchey@chapmantripp.com and
alice.hall@chapmantripp.com

Daytime Phone: +6493572709

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

Consultation Document Submissions

Chapter 2 Abbreviations and Definitions **Points:** 11.1

- Support

- Oppose
 Seek Amendment

I seek the following decision from the Council

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

Please see attached submission on PC14.

My submission is that

Please see attached submission on PC14.

Attached Documents

File
RVA - Submission on Plan Change 14 Christchurch

**Form 5**

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

Clause 6 of Schedule 1, Resource Management Act 1991

To Christchurch City Council (*Council*)

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

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

INTRODUCTION

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

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

² GPS-HUD, page 10.

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

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

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

BACKGROUND

RVA

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

Retirement villages

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

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

A regulated industry

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

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

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

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

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

New Zealand’s ageing population

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

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

⁷ Schedule 4.

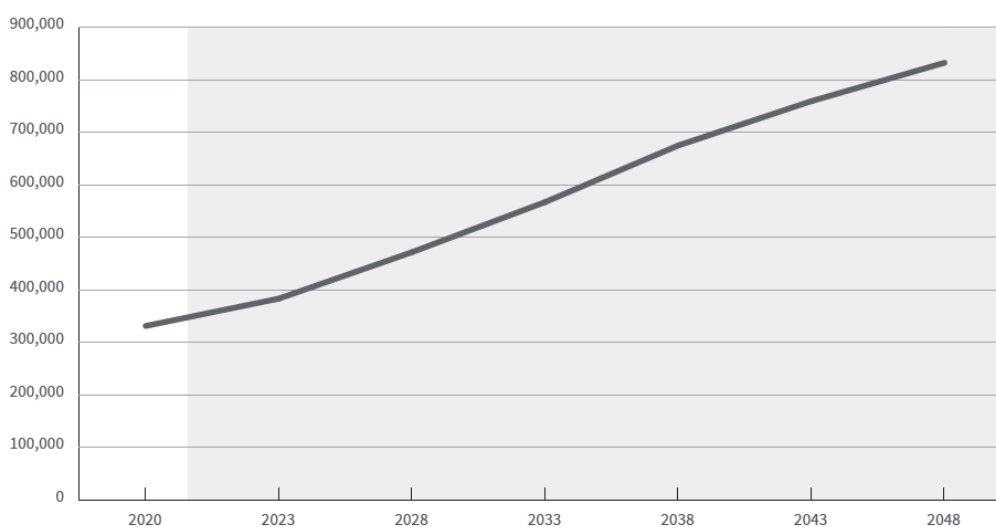
⁸ The Code sets out a residents’ rights to services, information, and consultation, the right to complain, the right to a speedy and efficient process for resolving disputes, the right to use a support person or representative in dealings with the operator or other residents at the village, the right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

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

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

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

Figure 1 75+ years population 2020 - 2048



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

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

¹⁰ Ibid.

¹¹ Statistics New Zealand, Population Projections.

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

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

The retirement housing and care crisis

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

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

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

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

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

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

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

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

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

Suitability of accommodation

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

¹⁷ Ibid, pages 5 and 25.

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

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

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

Mental wellbeing

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

The role of retirement villages

Addressing the retirement housing and care crisis

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

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

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

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

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

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

²³ Ibid, page 15.

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

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

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

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

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

Other benefits of retirement villages

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

WHAT PC14 MUST DELIVER FOR RETIREMENT VILLAGES

Better enable housing and care for the ageing population

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

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

²⁸ Ibid.

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

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

²⁹ RMA, s77G.

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

Recognise that retirement villages are a residential activity

- 69 A key issue with many existing district plans is their failure to explicitly recognise that retirement villages are a residential activity. This issue has resulted in consenting challenges with members of the community, and sometimes even council officers, taking the view that retirement villages are non-residential activities that should only be provided for in non-residential zones or seeking to assess different parts of a village in a different manner (such as a commercial activity).
- 70 Retirement villages are clearly a residential activity³⁰ as they provide permanent homes for the residents that live there. Retirement villages do provide a range of ancillary services. However, those services are provided for residents only and complement the residential function of retirement villages by meeting the particular needs of older residents. The residential nature of retirement villages is reflected in the national planning standard definition, which recognises the key function of villages as a "*residential complex or facilities*" for the provision of "*residential accommodation for people who are retired*".³¹
- 71 This recognition requires that retirement villages as a land use are a permitted activity. In line with the Enabling Housing Act, the RVA considers the construction of retirement villages (being four or more residential units on a site) can be regulated as a restricted discretionary activity, as is currently proposed, but with some refinements.
- 72 The RVA also seeks that the current "retirement village" definition be updated to reflect the National Planning Standard definition. Doing so will provide greater national consistency and allow Council to meet its statutory requirements to include National Planning Standard definitions in its plan.
- Provide for retirement villages in all appropriate zones**
- 73 The RVA members' experience is that older people want to stay in the communities in which they currently live, and have lived for many years, during their retirement. This is called 'ageing in place'. Ageing in place allows residents to remain close to their families, friends, familiar amenities and other support networks. It promotes activities that improve residents' wellbeing, including physical activity, social engagement and intergenerational activity, due to the accessible surrounding destinations in a familiar neighbourhood. Ageing also allows residents to continue to play an integral part in the communities that they helped establish.
- 74 For these reasons, the majority of retirement village residents come from dwellings located in surrounding suburbs.
- 75 It is noted that the Christchurch Replacement District Plan Independent Hearings Panel (chaired by a former High Court judge, with members including another

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

³¹ National Planning Standard, page 62.

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

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

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

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

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

- Provide for change to existing urban environments**
- 80 There are key differences between retirement villages and 'typical' residential dwellings. These differences mean that retirement villages do change the existing urban environments that are dominated by 'typical' dwellings. This change has not been acknowledged properly in planning frameworks leading to a range of consenting challenges.

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

³³ Auckland Unitary Plan Section 32 Report, Part 2.50.

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

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

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

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

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

Recognise the intensification opportunities provided by larger sites

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

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

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

Recognise the unique internal amenity needs of retirement villages

- 93 A key consenting challenge faced by the RVA members is an expectation from council officers that the internal amenity controls used for traditional housing typologies (e.g. outlook, sunlight, privacy, outdoor living spaces, and the like) are appropriate for retirement villages.

- 94 This approach fails to recognise the unique functional and operational needs of retirement villages (discussed above). For example, residents have access to a wide range of communal spaces as well as their individual homes, so their amenity is

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

³⁵ H3.3(8), H4.3(8), H5.3(9).

³⁶ Policy 14.2.4.2(vi).

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

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

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

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

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

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

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

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

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

Provide clear and focused matters of discretion

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

Provide appropriately focused notification rules

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

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

Use the MDRS as a guideline

107 The Enabling Housing Act sets medium density residential standards that guide when residential activities require closer assessment and when limited notification of proposals can be available. The retirement village-specific framework sought by the RVA takes a similar approach (given that retirement villages are a form of development with four or more residential units) with the standards informing matters of discretion and limited notification presumptions.

108 The Enabling Housing Act will result in a level of standardisation that will set expectations for the scale of development across the country. The standards have been deemed to 'cover the ground' in relation to the key matters relevant to residential proposals. With some amendments to reflect the specific nature of retirement villages, the RVA considers the standards also set a relevant baseline for identifying standards relevant for the construction of retirement villages.

109 Furthermore, it is important PC14 does not inadvertently make retirement village developments more difficult to consent, construct and use than standard residential development. Such an outcome would significantly exacerbate the retirement housing and care crisis that is already resulting in poor wellbeing outcomes for older people.

Provide for retirement villages in commercial and mixed use zones

110 The RVA's members generally seek to locate their villages in established, good quality residential areas, as these locations are most suited for residents to 'age in place'. However, due to the lack of suitable sites in existing residential areas and need to respond to the retirement living and care crisis, the RVA's members also operate retirement villages in some commercial and mixed use zones where there is good access to services and amenities (for example, Ryman's village in Northwood).

111 It is important to note that the Enabling Housing Act is not limited to residential zones. It also requires councils to ensure district plans provide for intensification of urban non-residential zones through the Enabling Housing Supply plan changes. As noted, Policy 3 of the NPSUD requires PC14 to enable intensification (through building heights and densities) that respond to the location of centres and rapid transit stops.

112 City centre, metropolitan centre, neighbourhood centre, local centre and town centre zones in particular provide opportunities for retirement villages. These areas serve the surrounding local communities and provide close access for amenities to residents who are often unable to walk long distances. Residents' wellbeing is improved when social engagement and intergenerational activities are easily accessible. Many general business areas are also located between centres and residential areas and are therefore potentially suitable for retirement villages.

113 The RVA notes it has recently agreed some updates to certain commercial zone provisions with the Council in the context of Plan Change 5 (a consent order from

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

RETIREMENT VILLAGE-SPECIFIC FRAMEWORK

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

Adoption of the MDRS

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

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

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

120 The RVA also seeks some more general policies:

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

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

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

Rules to enable retirement villages in the MRZ

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

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

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

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

Tailored matters of discretion for retirement villages

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

123.1 Recognise the positive effects of retirement villages;

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

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

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

Proportionate notification

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

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

Clear, targeted and appropriate development standards

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

Providing for retirement villages in commercial and mixed-use zones

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

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

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

Tree canopy and financial contributions

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

DECISION SOUGHT

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

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

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

John Collyns, Executive Director
12 May 2023

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Provisions	Submission Position	Reason for Submission	Relief Sought
			<p>does not need to be associated with each residential unit <u>or retirement unit</u>.</p> <p>ε. ... [remove remainder of standard..]</p> <p>δ. ...</p> <p>e. ...</p> <p>f. ...</p> <p>...</p>
Medium Density Residential Zone – Built Form Standard 14.5.2.3	Support	The RVA supports Standard 14.5.2.3 as it aligns with the height standard of the MDRS.	<i>Retain Standard 14.5.2.3 as notified.</i>
Medium Density Residential Zone – Built Form Standard 14.5.2.4	Support in part	The RVA supports Standard 14.5.2.4 to the extent it aligns with the building coverage standard of the MDRS, however, amendments are required to clarify the language to make the standard consistent by using defined terms.	<i>Amend Standard 14.5.2.4 as follows:</i> <ol style="list-style-type: none"> a. ... b. <i>For retirement villages, the percentage coverage by buildings <u>building coverage</u> shall be calculated over the net site area of the entire complex or group,</i>

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: James **Last name:** Barbour

On behalf of:

Preferred method of contact: Email

Postal address: PO Box 35

Suburb:

City: Christchurch

Country: New Zealand

Postcode: 8140

Email: anita@townplanning.co.nz

Daytime Phone: 021 568 335

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

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

Attached Documents

File

Plan Change 14 Submission- 28 Blair Ave- FINAL

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

To: **Christchurch District Council**

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

Background

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

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

Introduction

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

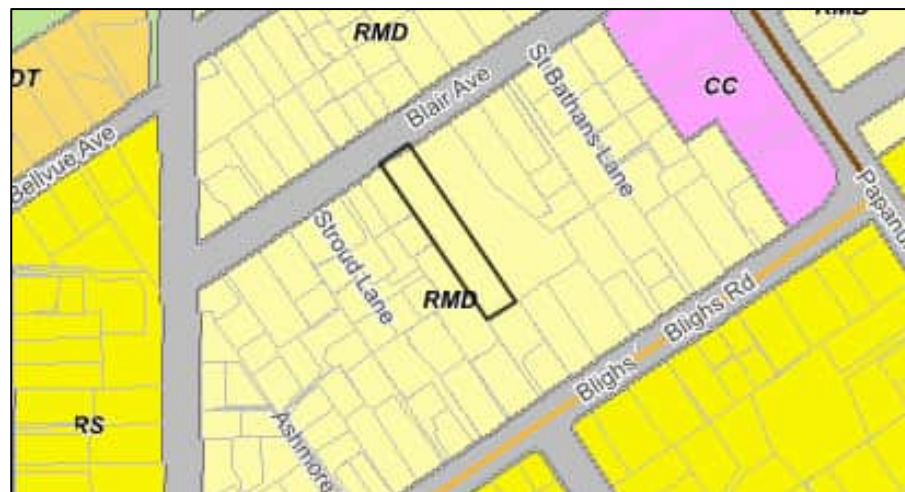


Figure 1 Location of the property within black boundaries, with operative District Plan zoning illustrated (CCC District Plan).

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

Specific provisions of the plan change that this submission relates to

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

Submission

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

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

Relief Sought

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

Other

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

DATED 12 May 2023



pp. _____

James Barbour and Judith Barbour

Address for Service: Town Planning Group
PO Box 2559
Queenstown

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

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Jo **Last name:** Appleyard

Organisation: Carter Group Limited

On behalf of:

Preferred method of contact

Postal address: Level 5, PwC Centre 60

Cashel Street

Suburb:

City:

Country: New Zealand

Postcode: 8140

Daytime Phone: 027 424 3716

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

PC14 Submission - Carter Group Limited 3463-6014-0323

Form 5

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

Clause 6 of Schedule 1, Resource Management Act 1991

To Christchurch City Council

Name of submitter: Carter Group Limited (*Carter Group*)

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

PROPOSED CHANGES TO THE RESIDENTIAL ZONE CHAPTERS

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

3.3.2 Objective - Clarity of language and efficiency

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

i. Minimises:

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

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

C. the requirements for notification and written approval; and

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

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

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

PROPOSED CHANGES TO THE COMMERCIAL ZONE CHAPTER

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

Avonhead mall

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

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

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

QUALIFYING MATTERS

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

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

18.2 Section 770 of the RMA grants Council's the power to impose qualifying matters over urban non-residential zones only to the extent necessary to accommodate a qualifying matter.

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

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

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

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

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

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

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

Heritage items and settings

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



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

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

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

26 Carter Group therefore seeks that:

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

26.2 Associated Heritage Setting 287 be removed from the same.

Proposed residential heritage areas and new rules relating to heritage

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

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

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

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

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

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

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

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

Significant and other trees

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

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

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

The New Regent Street heritage setting

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

Central City Heritage Interface

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

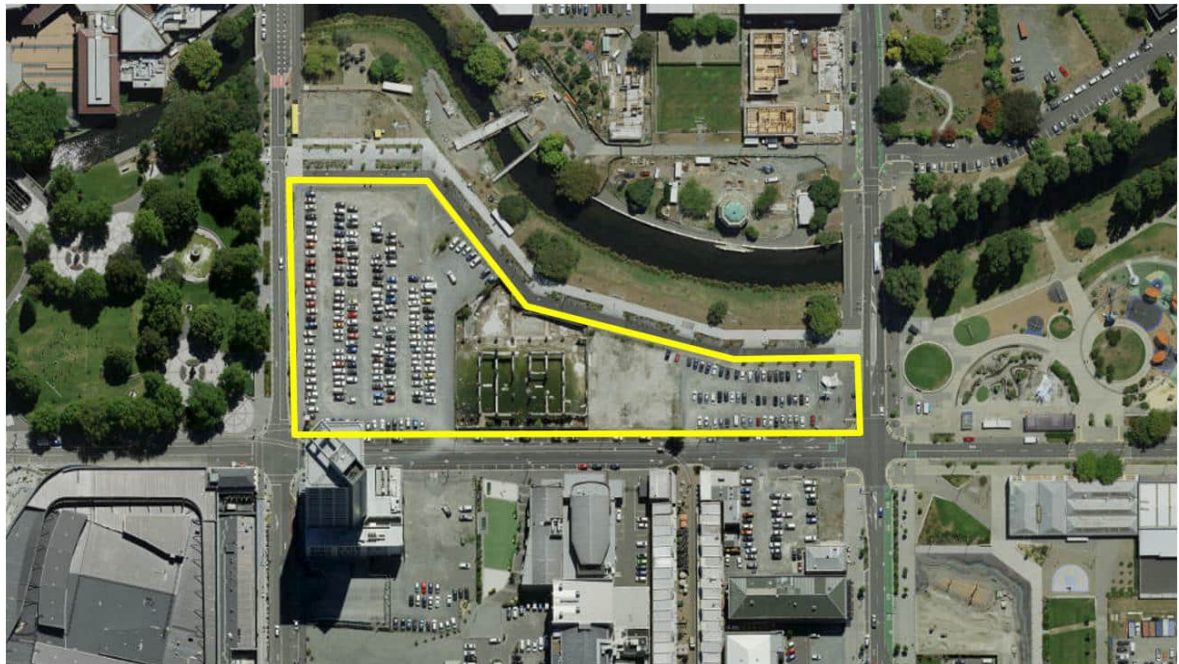


Figure 2: Approximate outline of site shown in yellow

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

Tsunami Management Area

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

Canterbury Regional Policy Statement

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

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

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

The Greater Christchurch Partnership

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

The tsunami evacuation area

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

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

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

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

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

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

[emphasis added]

49.6 Environment Canterbury themselves recognise that:³

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

[emphasis added]

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

The NIWA Report

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

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

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

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

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

FINANCIAL CONTRIBUTIONS POLICY

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

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

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

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

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

THE ZONING OF PARTICULAR SITES

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

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

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



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Partner
12 May 2023

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APPENDIX 1

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

No.	Provision	Position	Submission	Relief Sought
Chapter 14 Residential				

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

No.	Provision	Position	Submission	Relief Sought
			<ul style="list-style-type: none"> <li data-bbox="696 280 1263 379">• The variable height limits for different parts of the city are arbitrary, inconsistent and inequitable. <li data-bbox="696 421 1263 1038">• To the extent that variable height limits are proposed in response to heritage values/features, this incorrectly assumes that building height and high density built form is inherently incompatible with heritage values. Such a conclusion is at odds with the evidence of successful intensive inner city development in international cities alongside heritage features of considerably greater significance. Vibrant central cities (as sought by objectives in chapters 3 and 15) inherently feature heritage items alongside substantial modern buildings, and to rely on heritage features as a basis for limiting built form and height is narrow-minded, conservative and myopic. <li data-bbox="696 1080 1263 1345">• The heritage interfaces (and associated provisions) are generally opposed for the reasons stated in the covering submission. Among other things, it is noted that the heritage provisions in subchapter 9.3 provide for the management of buildings within heritage settings or alterations to heritage items. 	

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

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

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

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

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

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

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

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

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

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

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

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

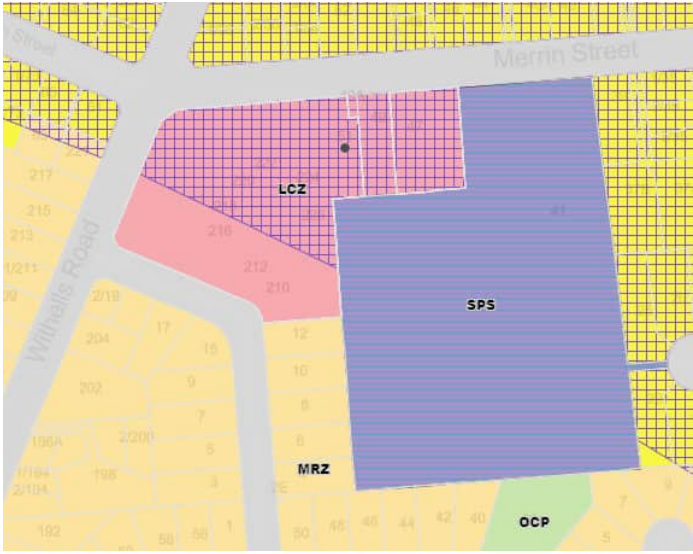
No.	Provision	Position	Submission	Relief Sought
			<p>requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	
6.	<p>Rule 15.13.2.10</p> <p>(CC(SF)MUZ – building tower setbacks)</p>	Oppose	<p>Imposing new, additional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

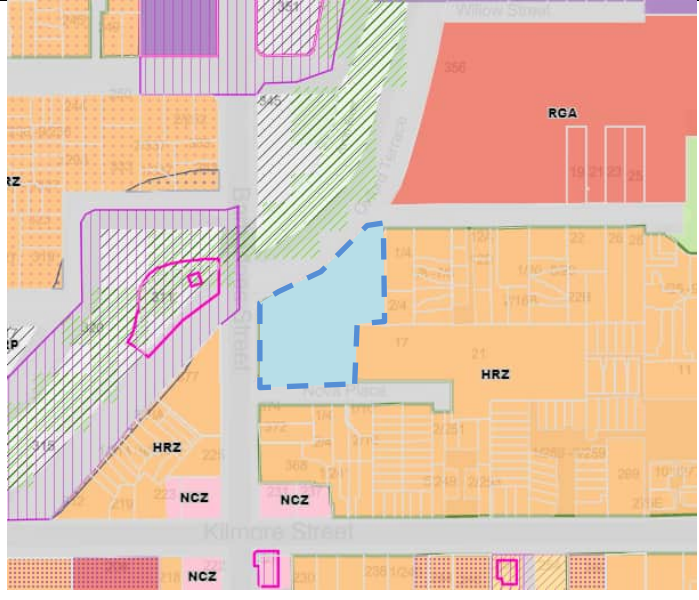
No.	Provision	Position	Submission	Relief Sought
			PC14 and accordingly this rule should be deleted.	
Chapter 15 – Commercial Zones- Matters of Discretion				
1.	Rule 15.14.3.1 (Matters of discretion- building height)	Oppose	<p>The proposed new matters of discretion in clause (b) for applications exceeding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

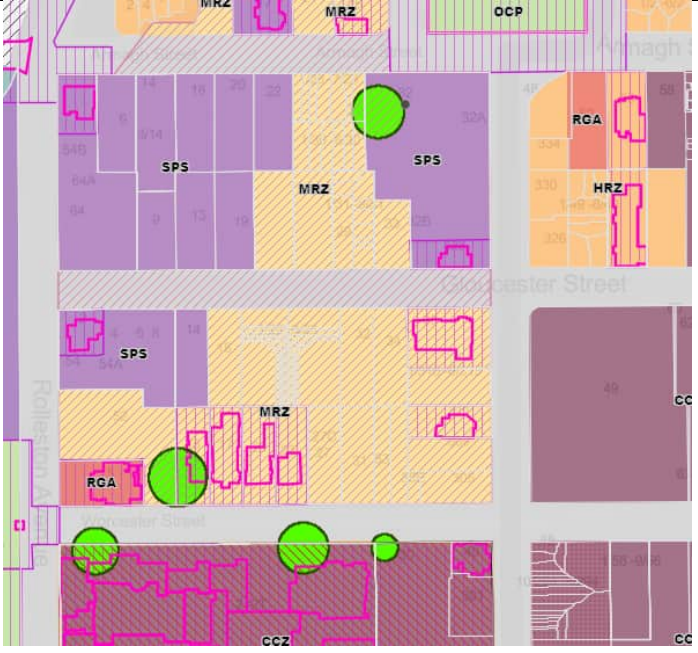
No.	Provision	Position	Submission	Relief Sought
	(Matters of discretion- upper floor setbacks, tower dimension and coverage)		<p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or appropriate for the purposes of promoting intensification.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

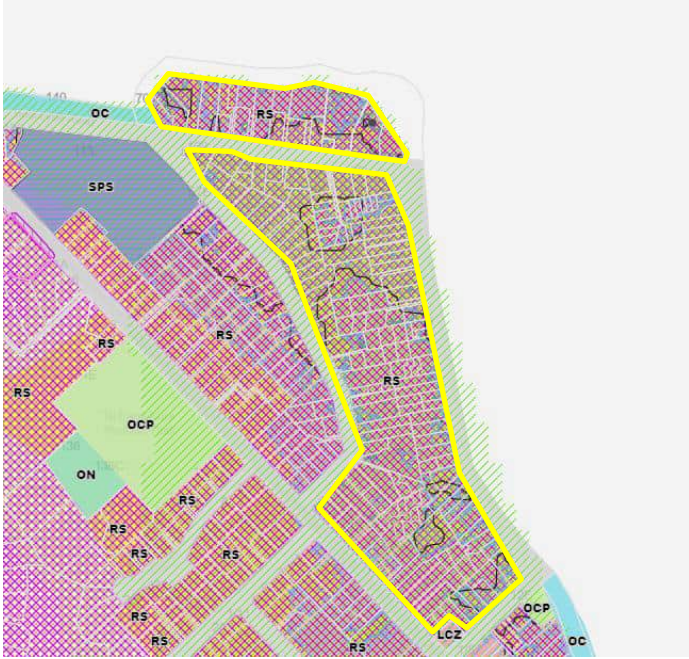
No.	Provision	Position	Submission	Relief Sought
4.	Rule 15.14.3.37 (Matters of discretion- Glazing)	Oppose	<p>The proposed new matters of discretion relate to rules that are otherwise opposed, and as such these should be deleted.</p> <p>These changes undermine the enablement of building height as directed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

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

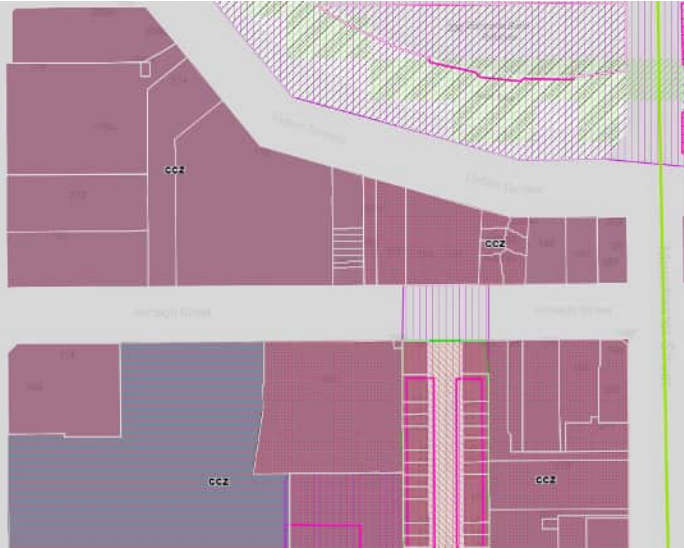
No.	Provision	Position	Submission	Relief Sought
Planning Maps / Rezoning				
1.	Planning maps	Support	For the reasons expressed in the submission above, the submitter supports the LCZ zoning of the properties on the corner of Merrin Street and Withells Road (Avonhead shopping centre). For the avoidance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

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

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

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

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

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

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 11/05/2023

First name: Julia **Last name:** Mallett

On behalf of:

Preferred method of contact Email

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Daytime Phone: 0211730778

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

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

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

Note to person making submission:

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

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

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

Consultation Document Submissions

Chapter 14 Residential **Points:** 15.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

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

My submission is that

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

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

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

2023 - 263 (as of 10.05.23)

2022 - 263

2021 - 288

2020 - 289

2019 - 292

2018 - 324

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

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

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

Te Ara Koropiko West Spreydon School is at the centre of our community and should be valued as such. If we do not safeguard the future of our school, the Board is concerned that not only will this be detrimental to our school, but will also lead to the community losing its special character. **As a Board we are particularly concerned** about the impact this will have on whānau Māori and tamariki Māori, and importance of preserving and enhancing whanaungatanga, and ensuring equitable access to high quality housing and education.

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

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

Attached Documents

File
No records to display.

Robson, Gina

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

Good afternoon,

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

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

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

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

Regards

Julia Mallett

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

julia.mallett@westspreydon.school.nz

0211730778

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Linda **Last name:** Morris

On behalf of:

Preferred method of contact Email

Postal address: 77 Eastern Terrace

Suburb: Beckenham

City: Christchurch

Country: New Zealand

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Email: graeme.linda@wildwater.co.nz

Daytime Phone: 022 1096 925

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

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

Note to person making submission:

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

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

Yes

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

Consultation Document Submissions

Chapter 14 Residential **Points:** 16.1

Support

Oppose

Seek Amendment

I seek the following decision from the Council

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

My submission is that

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

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

Attached Documents

File
No records to display.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

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

On behalf of:

Preferred method of contact: Email

Postal address: PO Box 35

Suburb:

City: Christchurch

Country: New Zealand

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Email: anita@townplanning.co.nz

Daytime Phone: 021 568 335

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

Attached Documents

File

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

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

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

Organisation: Wigram Lodge (2001) Limited

On behalf of:

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

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-152-158 Peterborough and 327-333 Manchester-FINAL

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

To: **Christchurch District Council**

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

Background

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

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

Introduction

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

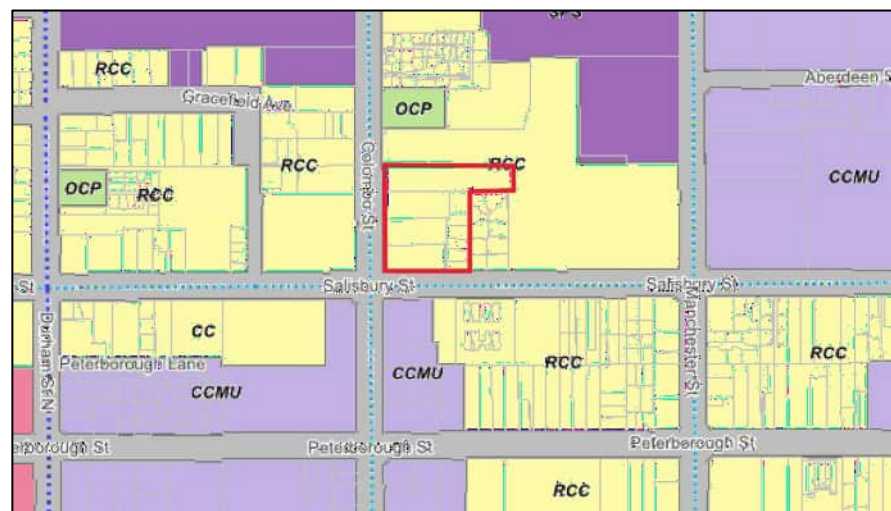


Figure 1 Location of the properties within red boundaries, with operative District Plan zoning illustrated (CCC District Plan).

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

Specific provisions of the plan change that this submission relates to

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

Submission

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

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

Relief sought

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

Other

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

DATED 12 May 2023



pp. _____

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

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

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

Attachment [A]

Legal Descriptions of the Submitters' property relevant to this submission

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

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

To: **Christchurch District Council**

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

Background

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

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

Introduction

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

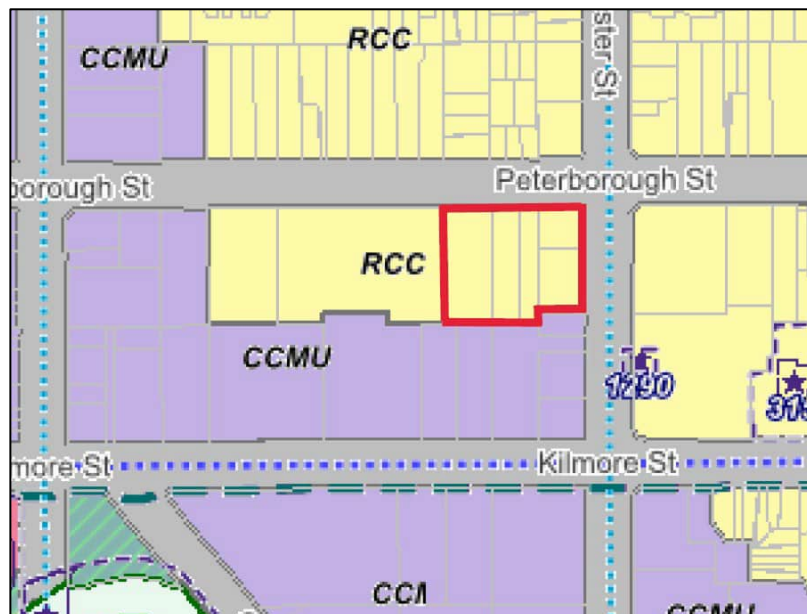


Figure 1 Location of the properties within red boundaries, with zoning illustrated (CCC District Plan).

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

Specific provisions of the plan change that this submission relates to

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

Submission

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

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


Relief sought

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

Other

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

DATED 12 May 2023

pp.  _____

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

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

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

Attachment [A]

Legal Descriptions of the Submitters' property relevant to this submission

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

Robson, Gina

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

Hi Aviva,

Correct for submission on PC14.

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

Submitters Details are:

Elizabeth Harris

Address for service:

PO Box 35
Christchurch
New Zealand 8140

Phone number for service:

0210573762

Agreement:

I could not Gain an advantage in trade competition through this submission.
I am not directly affected by an effect of the subject matter of the submission that :

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

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

Kind Regards,



Sam Kealey – Senior Planner

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

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

Kia ora Sam,

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

Ngā mihi,

Aviva Cui

Engagement Assistant

Communications and Engagement

Pronouns: she/her



03 941-6844 | 027 367 1828



Aviva.cui@ccc.govt.nz



Te Hononga Civic Offices, 53 Hereford Street, Christchurch



PO Box 73016, Christchurch 8154



ccc.govt.nz



From: Sam Kealey <sam@townplanning.co.nz>
Sent: Monday, 15 May 2023 1:07 pm
To: Engagement <engagement@ccc.govt.nz>
Cc: Anita Collie <anita@townplanning.co.nz>
Subject: PC14 Lodgment of Submission missing (2975-23)

Hi There,

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

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

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

Kind Regards,



Sam Kealey – Senior Planner

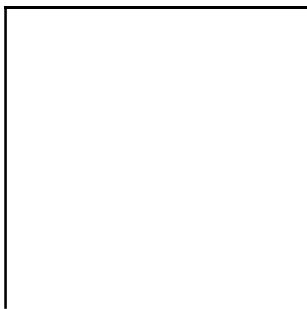
Cell: 021 057 3762 | Email: sam@townplanning.co.nz

Town Planning Group | www.townplanning.co.nz

Offices in Queenstown, Wānaka, Christchurch & Auckland

This electronic email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed. The views expressed in this message are those of the individual sender and may not necessarily reflect the views of the Christchurch City Council.

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



Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Malaghans Investments Limited **Last name:** Malaghans Investments Limited

Organisation: Malaghans Investments Limited

On behalf of:

Preferred method of contact: Email

Postal address: PO Box 35

Suburb:

City: Christchurch

Country: New Zealand

Postcode: 8140

Email: anita@townplanning.co.nz

Daytime Phone: 021 568 335

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

Attached Documents

File

Plan Change 14 Submission - Malaghans Investments- FINAL

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

To: **Christchurch District Council**

Name of Submitter: **Malaghans Investments Limited**

Introduction

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



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

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

Specific provisions of the plan change that this submission relates to

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

Submission

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

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

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

Relief sought

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

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

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

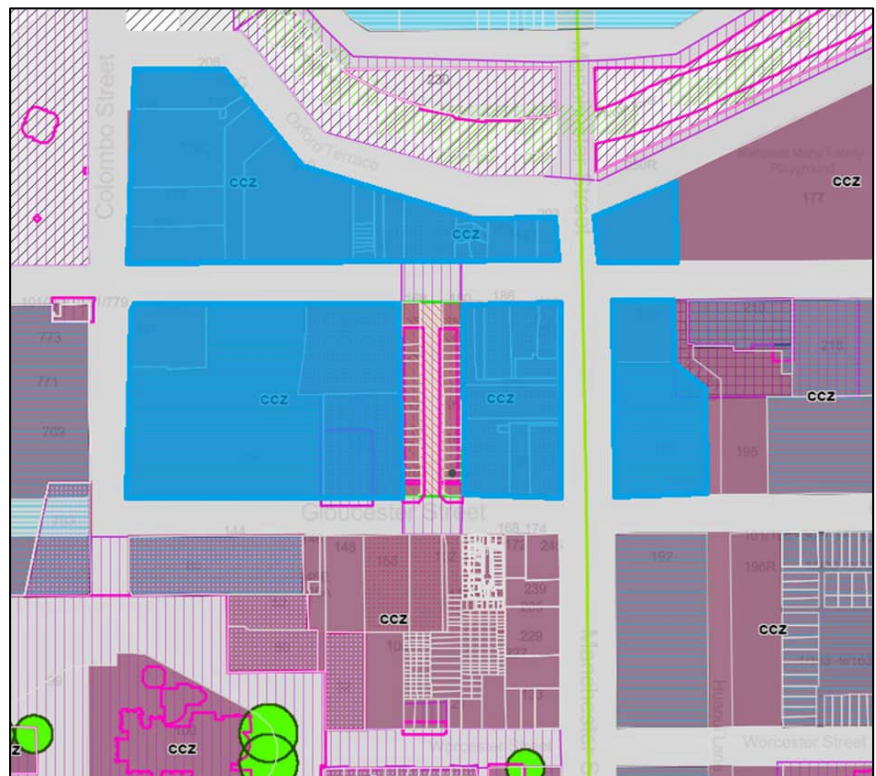



Figure 2: Area to be included in height limit restriction coloured in blue (Plan Change Map CCC).

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

Other

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

DATED 12 May 2023

pp.  _____

Malaghans Investments

Address for Service: Town Planning Group
PO Box 35
Christchurch

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

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Julie **Last name:** Comfort

On behalf of:

Preferred method of contact Email

Postal address: PO Box 679

Suburb:

City: Christchurch

Country: New Zealand

Postcode: 8140

Email: julie.comfort@dls.co.nz

Daytime Phone: 34790793

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

Planning MapsPoints: 19.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

Please see the attached submission

My submission is that

Please see the attached submission

Attached Documents

File
Benrogan Estates Ltd Submission to PC14

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

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

1. Submitter Details

Submitters name: Benrogan Estates Limited

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

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

Phone: 03-379-0793

2. Trade Competition:

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

If Yes to above, then:

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

(a) adversely affects the environment; and

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

3. Hearing options:

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

Yes No

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

Yes No

4. Submission Details

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

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

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

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

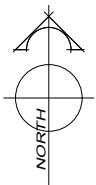
Provision to which my/our submission relates: <i>(Please specify the Objective, Policy, Rule, Rule Requirement, Assessment Matter, Mapping feature or other reference your submission relates to, eg TCZ-R12 Visitor Accommodation)</i>	My position on this provision is: <i>(Select one option)</i>	The reasons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

.....


12 May 2023

Signature of person authorised to sign on behalf of submitter

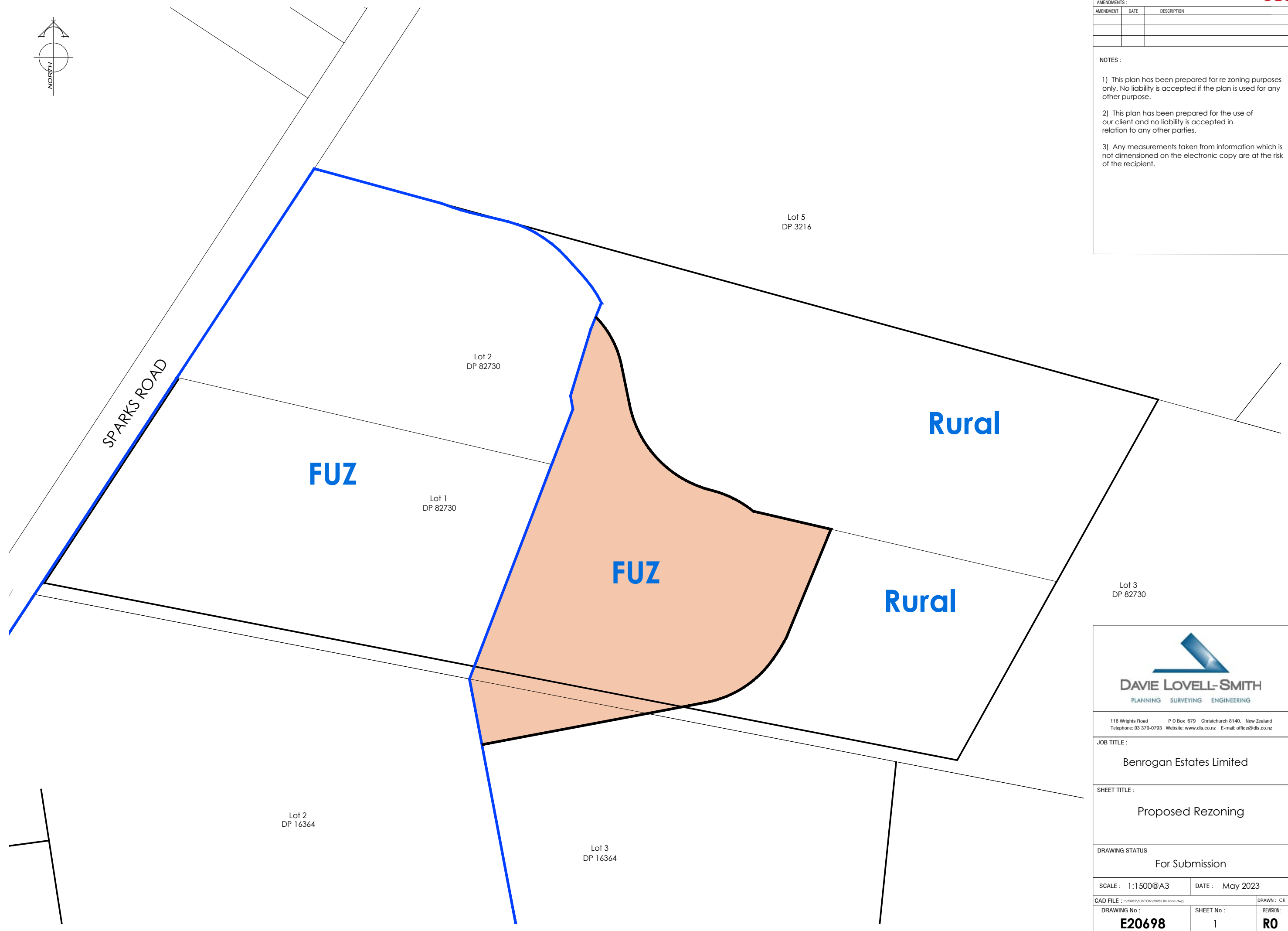
Attachment A – Proposed Rezoning Plan



AMENDMENTS :		
AMENDMENT	DATE	DESCRIPTION

NOTES :

- 1) This plan has been prepared for re zoning purposes only. No liability is accepted if the plan is used for any other purpose.
- 2) This plan has been prepared for the use of our client and no liability is accepted in relation to any other parties.
- 3) Any measurements taken from information which is not dimensioned on the electronic copy are at the risk of the recipient.



DAVIE LOVELL-SMITH
PLANNING SURVEYING ENGINEERING

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

JOB TITLE :
Benrogan Estates Limited

SHEET TITLE :
Proposed Rezoning

DRAWING STATUS
For Submission

SCALE : 1:1500@A3 DATE : May 2023

CAD FILE : J:\2023\SUBCOM\2023 Re Zone.dwg	DRAWN : CR
DRAWING No : E20698	SHEET No : 1
REVISION :	RO

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Julie **Last name:** Comfort

On behalf of:

Preferred method of contact Email

Postal address: PO Box 679

Suburb:

City: Christchurch

Country: New Zealand

Postcode: 8140

Email: julie.comfort@dls.co.nz

Daytime Phone: 3790793

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

Planning MapsPoints: 20.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

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

Please see the attached submission

My submission is that

Please see the attached submission

Attached Documents

File
Knights Stream Estates Ltd Submission to PC14

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

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

1. Submitter Details

Submitters name: **Knights Stream Estates Limited**

Address For Service: c\ - Davie Lovell-Smith Ltd
 PO Box 679, Christchurch 8140

Contact person: julie.comfort@dls.co.nz

Phone: 03-379-0793

2. Trade Competition:

We could gain an advantage in trade competition through this submission: Yes No

If Yes to above, then:

We are directly affected by an effect of the subject matter of the submissions that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition Yes No

3. Hearing options:

Do you wish to be heard in support of your submission? *If you choose yes, you can choose not to speak when the hearing date is advertised.*

Yes No

If others are making a similar submission would you consider presenting a joint case with them at the hearing? *You can change your mind once the hearing has been advertised.*

Yes No

4. Submission Details

Yes, I am enclosing further supporting information to this submission form

Provision to which my/our submission relates: <i>(Please specify the Objective, Policy, Rule, Rule Requirement, Assessment Matter, Mapping feature or other reference your submission relates to, eg TCZ-R12 Visitor Accommodation)</i>	My position on this provision is: <i>(Select one option)</i>	The reasons for my/our submission are: <i>(Please give details, eg I think this should be non-complying because we don't want this to occur in our town centre)</i>	The decision I/we want Council to make: <i>(Please specify if you want the provision to be retained, amended or deleted, eg Amend – change the activity status to non-complying)</i>
Planning Maps	<input checked="" type="checkbox"/> Oppose in part	Lots 30 DP 571567 is a Greenfield development block and as such it is considered appropriate that these sites should be zoned Future Urban Zone.	Rezone Lot 30 DP 571567 to Future Urban Zone.
Rule 6.10A.4.1.1 P2	<input checked="" type="checkbox"/> Oppose in part	<p>It is appropriate for a greenfield subdivision to either provide street trees or pay a financial contribution for it.</p> <p>What is not considered appropriate is for a greenfield subdivision which is creating vacant lots for further development to have to also provide for or pay for the tree canopy cover for the residential units at the time of subdivision. The definition of development site as applied to a subdivision would encompass all the land contained within the subdivision, including roads and reserves. That would mean that the area of land within the roads would be counted twice – once for the 20% development site cover under point (a) and again for the 15% road corridor cover under point (c). These means that 20% cover calculated at the time of the subdivision would be much larger than for the individual residential allotments created. On seeking clarification from Council staff. It was suggested that a consent notice would be placed on the residential lots to require the 20% cover, as per point (a) of this rule. It's unclear whether this 20% would be the calculation of the overall development site as noted above, or for each lot. If it is for each lot, then requiring 20% cover under P2 is not necessary, as the development of each individual is covered by P1.</p>	<p>Amend the rule so that only the 15% street tree canopy requirement is applicable to a vacant lot greenfield subdivision.</p> <p>Delete Activity specific standards – Tree canopy cover clause (a) and (b), an amend clause (d) to only refer to the 15% road corridor cover.</p>
6.10A.4.1.3 RD2	<input checked="" type="checkbox"/> Support in part	In greenfield subdivisions there are a number of situations where reserves are vested to Council with enhancements. For example,	Amend to rule to make it clear that reserves that are vested to Council with

<p>Provision to which my/our submission relates:</p> <p><i>(Please specify the Objective, Policy, Rule, Rule Requirement, Assessment Matter, Mapping feature or other reference your submission relates to, eg TCZ-R12 Visitor Accommodation)</i></p>	<p>My position on this provision is:</p> <p><i>(Select one option)</i></p>	<p>The reasons for my/our submission are:</p> <p><i>(Please give details, eg I think this should be non-complying because we don't want this to occur in our town centre)</i></p>	<p>The decision I/we want Council to make:</p> <p><i>(Please specify if you want the provision to be retained, amended or deleted, eg Amend – change the activity status to non-complying)</i></p>
		<p>enhancing waterways. In these situations, reserve contributions are not attributed to these reserves. We therefore support the approach by Council that these reserves can offset the tree canopy rule requirements. However, we consider that this needs to be more explicit in the rules to ensure this happens</p>	<p>enhancements can offset the tree canopy rules for the development.</p>
<p>8.2.6.2 8.3.3 Standard 6.10A.4.2.2</p>	<p><input checked="" type="checkbox"/> Oppose in part</p>	<p>There is no reasoning given in any of the Section 32 documentation for how the financial contribution of \$2,037.00 per tree has been calculated. Furthermore, it is unclear whether this is GST inclusive or not. The figure does not appear to relate to the Minimum Acceptable Rates provided for bonding under the IDS or for the maintenance period of 2 years.</p> <p>The CCC bond schedule for street trees allows for: For street trees that is \$500 per tree (includes the tree pit), and \$40 per tree per month for maintenance. Total per tree for 2 year bond period of \$1,460.00 all excl GST. With GST included that is only \$1,679.00. Assuming \$2,037 is excluding GST this is 1 tree plus 38.4 months maintenance. If Inc GST its 31.7 months of maintenance.</p>	<p>Make clearer in the plan how the costs have been attributed and whether it is GST inclusive.</p>
<p>Standard 6.10A.4.2.3 8.2.6.3 8.3.7</p>	<p><input checked="" type="checkbox"/> Oppose in part</p>	<p>It is unclear how Council will enforce the tree canopy rules on individual properties & within their own road reserve network. How will compliance be measured? Furthermore, will Council report on the compliance of the tree canopy rules and what projects the financial contributions go towards?</p> <p>Issues could arise where the species planted may be appropriate at the time but due to unforeseen circumstances, the vegetation may die and need to be replaced.</p> <p>Based on previous experiences, when Council needs to cut budgets the first departments this is impacted on are the reserves and maintenance teams and the monitoring and enforcement teams.</p>	

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Activity Standard 8.6.2	<input checked="" type="checkbox"/> Oppose in part	It is unclear whether there is a minimum allotment for the FUZ when there is an existing building. The drafting of the provision as notified removes the reference to 'Nil' for the previous named zoned of RNN. We suggest it is clearer within the standard that there is no minimum allotment size in the FUZ zone around existing buildings.	Amend the standard to make it clear that there is no minimum allotment size in the FUZ zone around existing buildings.

.....


12 May 2023

Signature of person authorised to sign on behalf of submitter

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Athena Enterprises Limited and Josephine Enterprises Limited **Last name:** Athena Enterprises Limited and Josephine Enterprises Limited

Organisation: Athena Enterprises Limited and Josephine Enterprises Limited

On behalf of:

Preferred method of contact Email

Postal address: PO Box 35

Suburb:

City: Christchurch

Country: New Zealand

Postcode: 8140

Email: anita@townplanning.co.nz

Daytime Phone: 021 568 335

I could not
 Gain an advantage in trade competition through this submission
 I am not
 directly affected by an effect of the subject matter of the submission that :
 a. adversely affects the environment, and
 b. does not relate to the trade competition or the effects of trade competitions.

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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

Plan Change 14 Submission- 9A and 9B Sheffield Cres-FINAL

Form 5
Submission on notified proposal for a Plan Change
Clause 6 of Schedule 1, Resource Management Act 1991

To: **Christchurch District Council**

Name of Submitter: **Athena Enterprises Limited and
Josephine Enterprises Limited**

Background

1. The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (**Amendment Act**) requires the Christchurch City Council (**Council**) to include Medium Density Residential Standards (**MDRS**) and to give effect to the National Policy Statement on Urban Development 2020 (**NPS-UD**) in its District Plan. The Council has sought to give effect to this requirement through the notification of Plan Change 14 - Housing and Business Choice (**PC14**) and Plan Change 13 - Heritage (**PC13**).
2. With respect to residential zones, the Amendment Act requires that:
 - (a) every residential zone in an urban environment of a specified territorial authority must give effect to policy 3 of the NPS-UD in that zone; and
 - (b) a territorial authority may create new residential zones or amend existing residential zones.
3. With respect to non-residential zones, the Amendment Act further requires that:
 - (a) the territorial authority must ensure that the provisions in its district plan for each urban non-residential zone within the authority's urban environment give effect to the changes required by policy 3 of the NPS-UD; and
 - (b) a territorial authority may create new urban non-residential zones or amend existing urban non-residential zones.
4. The public notice states that the changes proposed for PC14 are "extensive" and include:
 - (a) increasing height limits in and around the central city, and in suburban centres;
 - (b) changes to rules within commercial zones to ensure high quality urban environments and be more enabling of activities without the need for resource consent;

- (c) medium and high density residential zones with new rules are being introduced across all urban residential areas;
- (d) rezoning of industrial areas near the central city for housing and mixed-use activities;
- (e) introducing qualifying matters to reduce the scale and density of buildings enabled by the MDRS and NPS-UD is reduced; and
- (f) amending objectives, policies, and other provisions throughout the District Plan.

Introduction

5. This is a submission on PC14 made by Athena Enterprises Limited and Josephine Enterprises Limited (**the submitters**). The submitters have interests in the properties at 9, 9A and 9B Sheffield Crescent (**the site**). The properties owned by Athena Enterprises Limited are legally described as Lot 5 DP 62637 as held within the Record of Title CB36D/950, Unit A Deposited Plan 66465 as held within the Record of Title CB39A/366. The property owned by Josephine Enterprises Limited is legally described as Unit B Deposited Plan 66465 as held within the Record of Title CB39A/367.
6. The properties are depicted in **Figure 1** below.

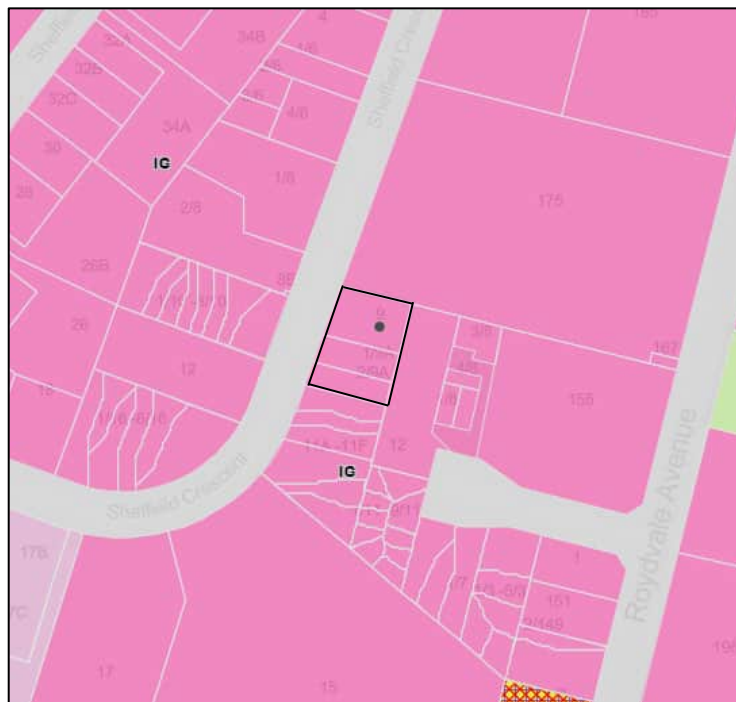


Figure 1 Location of the property within black boundaries, with zoning and overlays illustrated (CCC GIS).

7. The site is located within the Industrial General Zone under the operative District Plan. The site is proposed to remain zoned Industrial General Zone under PC14.

Specific provisions of the plan change that this submission relates to

8. The submitters have an interest in the plan change as a whole and therefore this submission relates to all the provisions and zonings of the plan change. The submitters have a specific interest in all provisions and zoning that relate to the properties referred to above.

Submission

9. The submitters **oppose** the plan change as notified. More specifically:
- (a) the submitter supports the intensification of urban form to provide for additional development capacity, particularly near the city and commercial centres, and supports any provisions or changes to the District Plan that will achieve this outcome;
 - (b) Notably, the submitter considers that amendments are required to existing zones to enable the outcomes sought by PC14 to be realised;
 - (c) The submitter requests that the site is rezoned to an alternative zone that provides for more intense commercial activity (as defined), better giving effect to the NPS-UD than the status quo.
10. Policy 3 of the NPS-UD is of direct relevance, whereby at sub clause (d) it directs that the district plan is to enable building heights and density of urban form commensurate with the level of commercial activity and community services.
11. The submitter's site is developed with commercial buildings, which the submitters lease to several different commercial organisations. The tenancies include office activities, which have been established since the Canterbury Earthquakes and prior to the current version of the Christchurch District Plan. The character of activity on the site is commercial.
12. A commercial zone would more appropriately reflect the character of existing activity on the site. Office tenancies on the site have been long established but are not enabled or protected by the existing Industrial General zoning. The existing zoning does not reflect the high degree of established commercial and office activity on the site and in the surrounding area. The submitters consider that a commercial zoning would more appropriately reflect the existing environment.
13. Rezoning the site to an appropriate commercial zone along with commensurate changes to the District Plan to provide for this submission and give effect to the NPS-UD will:
- (a) achieve the outcomes sought in PC14;
 - (b) contribute to the social and economic well-being of communities and meet the reasonably foreseeable needs of future generations;
 - (c) represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means;

- (d) give effect to the NPS-UD (notably Policy 3) and Canterbury Regional Policy Statement; and
- (e) promote the sustainable management of natural and physical resources, will be consistent with Part 2 of the Resource Management Act 1991 and ultimately achieve its purpose.


Relief Sought

14. The submitter seeks the following relief:
- (a) rezone the Site to an appropriate commercial zone which provides for a wide range of commercial activity (as defined) including offices; or
 - (b) include provisions to enable the range of matters outlined in paragraph 4 above that together assist with ensuring PC14 gives effect to the NPS-UD;
 - (c) any other additional or consequential relief to the District Plan, including but not limited to, the maps, issues, objectives, policies, rules, controls/discretions, assessment criteria and explanations that will give effect to the matters raised in this submission and the relevant planning legislation.

Other

15. The submitters could not gain an advantage in trade competition through this submission.
16. The submitters wish to be heard in support of their submission.
17. If others make similar submissions, the submitter will consider presenting a joint case at any hearing.

DATED 12 May 2023

pp.  _____

Athena Enterprises Limited and Josephine Enterprises Limited

Address for Service: Town Planning Group
PO Box 35
Christchurch 8014

Contact Person: Anita Collie
Cell: 021 568 335
E-mail: anita@townplanning.co.nz

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Emma **Last name:** Lewis

Organisation: Naxos Enterprises Limited and
Trustees MW Limited

On behalf of:

Preferred method of contact Email

Postal address: PO Box 35

Suburb:

City: Christchurch

Country: New Zealand

Postcode: 8140

Email: anita@townplanning.co.nz

Daytime Phone: 021 568 335

I could not
Gain an advantage in trade competition through this submission

I am not
directly affected by an effect of the subject matter of the submission that :
a. adversely affects the environment, and
b. does not relate to the trade competition or the effects of trade competitions.

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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

Plan Change 14 Submission-14 Field Tce-FINAL

Form 5
Submission on notified proposal for a Plan Change
Clause 6 of Schedule 1, Resource Management Act 1991

To: **Christchurch District Council**

Name of Submitter: **Emma Mary Lewis, James William Lewis, Naxos Enterprises Limited, Trustees MW Limited**

Background

1. The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (Amendment Act) requires the Christchurch City Council (**Council**) to include Medium Density Residential Standards (**MDRS**) and to give effect to the National Policy Statement on Urban Development 2020 (**NPS-UD**) in its District Plan. The Council has sought to give effect to this requirement through the notification of Plan Change 14 (PC14 Housing and Business Choice) and Plan Change 13 (PC13 Heritage).
2. With respect to residential zones, the Amendment Act requires that:
 - a. every residential zone in an urban environment of a specified territorial authority must give effect to policy 3 of the NPS-UD in that zone; and
 - b. a territorial authority may create new residential zones or amend existing residential zones.
3. With respect to non-residential zones, the Amendment Act further requires that:
 - (a) the territorial authority must ensure that the provisions in its district plan for each urban non-residential zone within the authority's urban environment give effect to the changes required by policy 3 of the NPS-UD; and
 - (b) a territorial authority may create new urban non-residential zones or amend existing urban non-residential zones.
4. The public notice states that the changes proposed for PC14 are "extensive" and include:
 - a. increasing height limits in and around the central city, and in suburban centres;
 - b. changes to rules within commercial zones to ensure high quality urban environments and be more enabling of activities without the need for resource consent;

- c. medium and high density residential zones with new rules are being introduced across all urban residential areas;
- d. rezoning of industrial areas near the central city for housing and mixed-use activities;
- e. introducing qualifying matters to reduce the scale and density of buildings enabled by the MDRS and NPS-UD is reduced; and
- f. amending objectives, policies, and other provisions throughout the District Plan.

Introduction

- 5. This is a submission on PC14 made by Emma Mary Lewis, James William Lewis, Naxos Enterprises Limited, Trustees MW Limited (**the submitter**). The submitter has interests in the property legally described as Lot 2 DP 12606 as held within Record of Title CB488/131, located at 14 Field Terrace, Upper Riccarton, Christchurch (**the Site**).
- 6. The property is located within the Residential Suburban Zone under the operative District Plan. The site is proposed to be zoned Medium Density Residential under PC14.
- 7. The property is depicted in **Figure 1**.

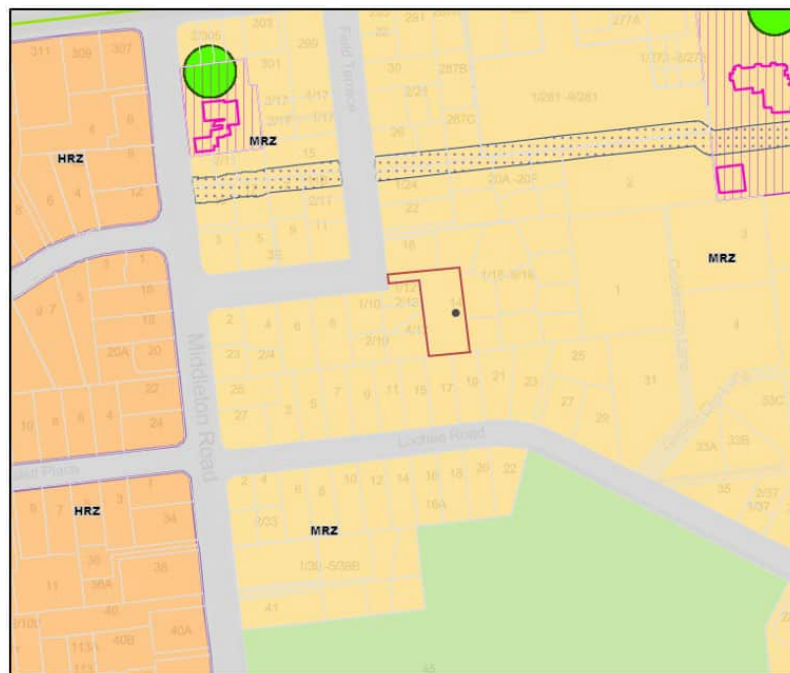


Figure 1 Site location and zoning (CCC GIS Map)

- 8. The property is located on Field Terrace which is a local road. The property has legal access from Field Terrace.

Specific provisions of the plan change that this submission relates to

- 9. The submitter has an interest in the plan change as a whole and therefore this submission relates to all provisions and zonings of the plan change. The submitter has a specific interest in all provisions and zoning that relate to the property referred to above.

Submission

10. The submitter both **supports** and **opposes** the plan change as notified. More specifically:
 - (a) the submitter supports the intensification of urban form to provide for additional development capacity, particularly near the city and commercial centres, and supports any provisions or changes to the District Plan that will achieve this outcome;
 - (b) the submitter opposes any provisions or changes that will adversely affect the outcome in (a); and
 - (c) requests that the submitter's site and properties in the surrounding and wider area (such that any rezoning is contiguous) are rezoned to the high density residential zone to provide for more intense residential activity, better reflecting the site context in the locale and being the most appropriate way to give effect to the NPS-UD.
11. The submitter's site and surrounding locale is ideally suited for a higher density of development, being in a location that exhibits a clear and immediate need for further housing supply in a convenient location to public transportation, and in walking distance to local schools and the Riccarton shopping centre. The site is sandwiched between two areas of high density residential zones and should be rezoned for consistency and continuation along the main trunk road of Riccarton Road.
12. The submitter also considers that the density standards as set out in the Amendment Act best achieve the NPS-UD, and PC14 should be amended to reflect those.
13. Rezoning the site to provide for high density residential development along with commensurate changes to the District Plan to provide for this submission and give effect to the NPS-UD will:
 - (a) enable more people to live in an urban environment where there is a high demand for housing in the area, relative to other areas in the urban environment;
 - (b) contribute to the social and economic well-being of communities and meet the reasonably foreseeable needs of future generations;
 - (c) represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means;
 - (d) give effect to the NPS-UD (notably Policy 3) and Canterbury Regional Policy Statement; and
 - (e) promote the sustainable management of natural and physical resources, will be consistent with Part 2 of the Resource Management Act 1991 and ultimately achieve its purpose.

Relief Sought

14. The Submitter seeks that the NPS-UD is properly and fully given effect to through the provisions and zoning of PC14 through the intensification of

development through enabling plan provisions and an increase in development capacity for residential and business use across the district.

15. The Submitter primarily seeks the following from the Council:
- (a) the submitters site and the surrounding properties are rezoned to High Density Residential or the proposed zone is amended to achieve similar outcomes as the High Density Zone by way of further intensification;
 - (b) reject, refuse, or otherwise decline the Qualifying Matters that do not align with that directed by the Central Government through the Amendment Act.
 - (c) any other additional or consequential relief to the District Plan, including but not limited to, the maps, issues, objectives, policies, rules, controls/discretions, assessment criteria and explanations that will give effect to the matters raised in this submission and the relevant planning legislation.

Other

16. The submitter could not gain an advantage in trade competition through this submission.
17. The submitter wishes to be heard in support of his submission.
18. If others make similar submissions, the submitter will consider presenting a joint case at any hearing.

DATED 12 May 2023

pp.  _____

Emma Mary Lewis, James William Lewis, Naxos Enterprises Limited, Trustees MW Limited

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Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Jo **Last name:** Appleyard

Organisation: The Catholic Diocese of
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On behalf of:

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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:

Attached Documents

File

PC14 Submission - Catholic Diocese 3461-4216-7587

Form 5

**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR
PLAN, CHANGE OR VARIATION**

Clause 6 of Schedule 1, Resource Management Act 1991

To Christchurch City Council

Name of submitter: The Catholic Diocese of Christchurch (*the Diocese*)

- 1 This is a submission on the proposed plan change 14 (*PC14*) to the Christchurch District Plan (*the District Plan*).
- 2 The Diocese could not gain an advantage in trade competition through this submission.
- 3 The Diocese's submission relates to the whole of PC14. The specific relief sought by the Diocese is set out at **Appendix 1** and the key points elaborated on below.
- 4 The Diocese wishes to be heard in support of the submission.
- 5 If others make a similar submission, the Diocese will consider presenting a joint case with them at a hearing.

PROPOSED CHANGES TO THE RESIDENTIAL ZONE CHAPTERS

- 6 By way of general feedback, the Diocese considers that PC14 fails to enable intensification, residential activity and building heights in the manner envisaged by the NPS-UD and Resource Management Act 1991.
- 7 More specifically, to the extent that greater provision for building heights and/or residential activity has been provided for throughout the City by way of the proposed changes, this is countered by the corresponding amendments to policy provisions, rules, activity status, and assessment matters which have the effect of introducing greater time, cost and uncertainty to projects.
- 8 In the Diocese's views, such changes undermine the intensification sought by the RMA and NPS-UD and they are not otherwise necessary or appropriate to promote intensification in a manner consistent with the stated purpose of PC14. Moreover, such changes are inconsistent with strategic directions in Chapter 3, and objective 3.3.2 in particular which requires (with our emphasis):

3.3.2 Objective - Clarity of language and efficiency

a. The District Plan, through its preparation, change, interpretation and implementation:

i. Minimises:

A. transaction costs and reliance on resource consent processes; and

B. the number, extent, and prescriptiveness of development controls and design standards in the rules, in order to encourage innovation and choice; and

C. the requirements for notification and written approval; and

ii. Sets objectives and policies that clearly state the outcomes intended; and

iii. Uses clear, concise language so that the District Plan is easy to understand and use.

- 9 In simple terms, the additional regulatory controls proposed are not enabling.
- 10 In the Diocese's views, greater use should be made of permitted or controlled activity status; and caution should be exercised in the drafting of policies and assessment criteria to ensure such provisions are clear, certain and are ultimately enabling and supportive of intensification.

PROPOSED CHANGES TO THE COMMERCIAL ZONE CHAPTER

- 11 In general terms, the proposed changes to commercial zones fail to 'enable' intensification in the manner envisaged by the NPS-UD, and policy 3 especially. Again, such changes are also inconsistent with strategic objective 3.3.2.
- 12 To the extent that intensification is provided for by PC14 (e.g. increased building heights), this is countered by the corresponding amendments to policy provisions, rules, activity status, and assessment matters which have the effect of 'disenabling' or further constraining development and adding time, cost and uncertainty to projects.
- 13 Such changes undermine the intensification sought by the NPS-UD and they are not otherwise necessary or appropriate to promote intensification in a manner consistent with the stated purpose of PC14.
- 14 In simple terms, the additional regulatory controls proposed are not enabling.
- 15 In the Diocese's views, greater use should be made of permitted or controlled activity status; and caution should be exercised in the drafting of policies and assessment criteria to ensure such provisions are clear, certain and are ultimately enabling and supportive of intensification.

FINANCIAL CONTRIBUTIONS POLICY

- 16 The proposed tree canopy cover and financial contributions provisions are unworkable and unreasonable.
- 17 The provisions are difficult to understand and create considerable uncertainty. For example:

- 17.1 If trees are retained over and above the 20% cover threshold will a financial credit be provided to the applicant?
- 17.2 It is not clear who would be qualified to undertake the assessment of the canopy cover.
- 17.3 The proposed definitions of PC14 introduce the definition of a 'hedge' with specific reference to the tree canopy cover and financial contributions provisions, yet those provisions do not utilise that term.
- 17.4 If a stormwater basin is heavily planted in native shrubs, should this receive a credit as plants (and not just trees) also provide for carbon sequestration?
- 17.5 How will the timing of assessment work in relation to consenting processes? For greenfield subdivisions for example, landscape plans are often not completed until after resource consent is issued.
- 18 The canopy cover provisions would be difficult to enforce. If canopy cover is determined as acceptable at the time of resource consent and 10 years or 15 years later one or some of those trees are cut down, who monitors and enforces that requirement? Does Council have the staff resources to maintain that level of monitoring across wide swathes of the city?
- 19 Councils increasingly seek a reduction in reserve areas within greenfield subdivisions, on the basis of ongoing maintenance costs for the Council. It would be very difficult to achieve a 20% of net site area coverage in most greenfield subdivisions, noting that those reserve areas are also required for other purposes such as playground and open grass for play areas, that are incompatible with extensive tree canopy cover.
- 20 The provisions require 20% of the net site area adjacent to road corridors to contain tree cover. Accommodating tree cover typically necessitates wider road corridors. Wider road corridors reduces land available for housing, in direct conflict with the existing District Plan provisions stipulating a minimum density of 15 hh/ha must be achieved for greenfield subdivision areas, and more generally the NPS-UD.
- 21 The cost implications of not achieving tree cover are considerable and, given the Diocese does not consider the 20% cover is achievable, will add further to development costs that are then passed onto purchasers.
- 22 The implications of this proposed policy are significant from an economic perspective and must be adequately justified by the Council. As it stands, the Diocese do not consider the Council has done this and therefore the proposed financial contributions policy should be deleted in its entirety.

SITE SPECIFIC MATTERS

- 23 The Diocese is considering its options for the location of a new Catholic cathedral to be constructed in Central Christchurch. Currently, the Diocese has three potential sites being considered for this. The Diocese seek a rule be included in PC14 that

would enable the construction of such a cathedral on one of these sites. The proposed wording for this rule is set out in **Appendix 1**.

Armagh Street Site

- 24 The Diocese have interests in the land bounded by Oxford Terrace, Manchester Street, Armagh Street, and Colombo Street as shown below:

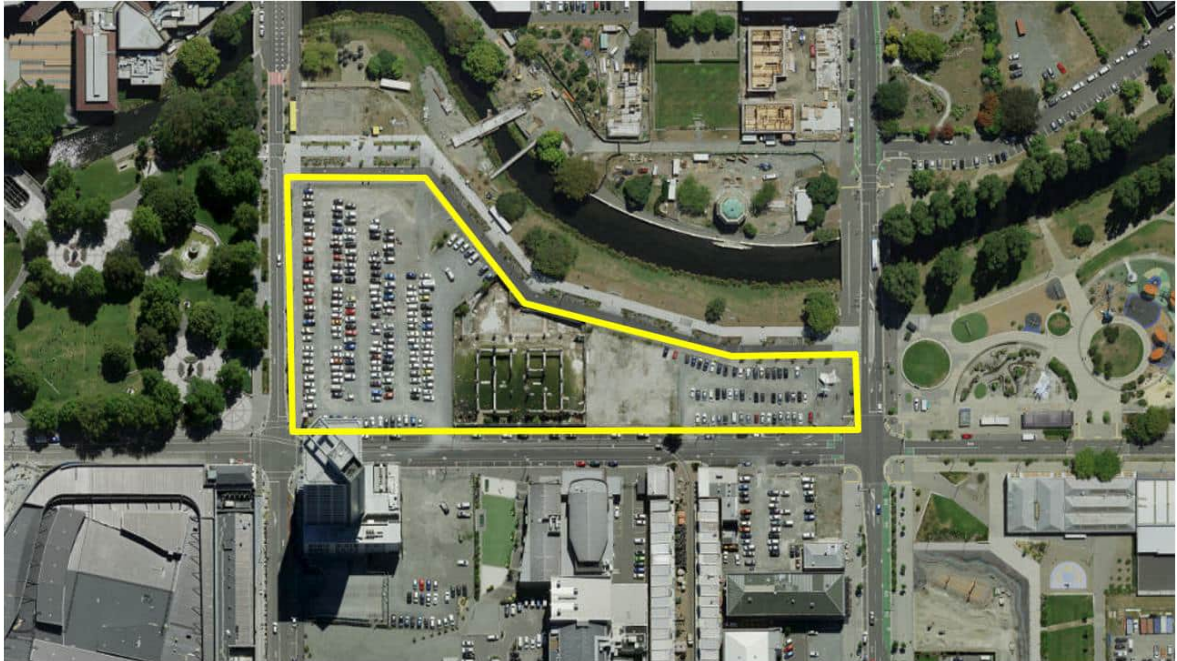


Figure 1: Approximate outline of Armagh Street Site shown in yellow

- 25 This location is one of three potential sites for the construction of a new Catholic Cathedral.
- 26 The Diocese support the zoning of this site as City Centre Zone. However, there are a number of aspects of PC14 that the Diocese oppose in respect of the Armagh Street Site:

The New Regent Street heritage setting

- 26.1 The Diocese oppose the extent of the heritage setting for New Regent Street (being heritage setting 336 associated with heritage item 404 in Appendix 9.3.7.2 schedule).
- 26.2 The Diocese oppose the identification of this heritage setting to the northern most edge of Armagh Street and consider the setting should end at the southern most edge of Armagh Street, being where New Regent Street meets Armagh Street. Among other reasons, the Diocese consider that the modern buildings fronting Armagh Street at either end of New Regent Street or the Armagh Street road reserve have no apparent heritage values that warrant a heritage setting.
- 26.3 There is no basis for why this heritage setting extends as far as it does.

Central City Heritage Interface

- 26.4 Part of this site is subject to the proposed 'Central City Heritage Interface' overlay. This overlay is strongly opposed by the Diocese. The Diocese considers there is no basis or justification for such an overlay over the Armagh Street Site. Among other reasons, the Diocese notes that the site has no identified heritage values and is surrounded by roads, that provide an adequate interface to and separation from other sites in the area, including those which may have heritage value.
- 26.5 It is also unclear why there are no objectives or policies introduced into the Historic Heritage chapter of the plan by PC14 in respect of these heritage interface sites. This gives very little direction to plan users as to their utility and/or relevance.
- 26.6 On this basis, the Diocese therefore seek:
- (a) the heritage interface overlays in general (maps and any associated provisions) are removed from PC14; or
 - (b) the Central City Heritage Interface relating to New Regent Street is removed; or
 - (c) at the very least, the Central City Heritage Interface is removed from the above site.

The Barbadoes Street Site

- 27 The Diocese have interests in the land bounded by Ferry Road, Moorhouse Avenue, and Barbadoes Street as shown below:



Figure 2: Approximate outline of Barbadoes Street Site shown in yellow

- 28 This location is one of three potential sites for the construction of a new Catholic Cathedral.
- 29 The Diocese support the underlying zoning of this site as Central City Mixed Use Zone (CCMUZ). However, the Diocese oppose the following with respect to the Barbadoes Street Site:

Incorrect mapping of heritage item

- 29.1 136 Barbadoes Street previously housed the Cathedral of the Blessed Sacrament (the *Cathedral*), a highly significant heritage item (item number 46), before it was demolished pursuant to a section 38 notice issued by the Canterbury Earthquake Recover Authority.
- 29.2 PC14 proposes to remove the Cathedral from the Schedule of Significant Historic Heritage in Appendix 9.3.7.2 of the District Plan. The Diocese support this change on the basis that the Cathedral has now been demolished and the site no longer contains any heritage items or values.

29.3 However, the Cathedral is still showing as a heritage item in the Council's electronic proposed map¹ for PC14 (as well as PC13). The Diocese consider it is likely that this is an administrative error where the removal of the listing in the plan was not properly reflected in the electronic planning maps.

29.4 Given both PC13 and PC14 proposes to remove the heritage listing for the Cathedral, it is no longer appropriate for any of the planning maps to show a heritage item on the site. The Diocese therefore seek that the heritage listing shown at 136 Barbadoes Street is removed from the electronic planning map.

The Manchester Street Site

30 The Diocese have interests in the land located at 373 and 375 Manchester Street as shown below:



Figure 3: Approximate outline of Manchester Street Site shown in yellow

31 This location is one of three potential sites for the construction of a new Catholic Cathedral.

¹<https://christchurchcity.maps.arcgis.com/apps/webappviewer/index.html?id=ad65227f17a8492aa9191f4c665a3d0a#propertymaps>

- 32 The Diocese oppose the underlying High Density Residential Zone (*HRZ*) and seek that the Manchester Street Site be rezoned CCMUZ. CCMUZ land is located directly opposite the Diocese's site on Manchester Street. Rezoning the Manchester Street Site to CCMUZ will provide for a contiguous enlargement of the current CCMUZ on Manchester Street. There are also other pockets of CCMUZ in the wider vicinity of the Manchester Street Site that are similarly sized and the rezoning would therefore be consistent with the CCMUZ zoning pattern.
- 33 The Diocese wishes to retain the current Specific Purpose (School) zoning that currently sites on the Manchester Street site. The underlying zoning is relevant in the event that the site is redeveloped for other purposes, including for a new Cathedral. A spiritual facility the size of a Cathedral would be a non-complying activity under the HRZ provisions, and for this reason CCMUZ is sought instead.

Signed for and on behalf of the Catholic Diocese of Christchurch by its solicitors and authorised agents Chapman Tripp



Jo Appleyard
Partner
12 May 2023

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APPENDIX 1

No.	Provision	Position	Submission	Relief Sought
Chapter 1 Introduction				
1.	General feedback – 1.3.4.2	Neutral	PC14 proposes explanatory text regarding the potential infrastructure constraints for development that is enabled by the District Plan and PC14. The submitter considers this text is ultimately helpful to readers of the District Plan but is concerned at this possibility eventuating.	Retain as notified

No.	Provision	Position	Submission	Relief Sought
Chapter 2 Abbreviations and definitions				
1.	Definition - Accessory building	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications. For example, attached accessory buildings may require consent where they would otherwise be permitted in other zones (e.g.	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
			attached garages, solar heating devices, etc).	
2.	Definition of 'Alteration'	Oppose	The definition has the effect of meaning that any change, modification or addition to a heritage item, heritage setting or heritage fabric, or a building in a heritage area will constitute an 'alteration' and trigger corresponding rules and consent requirements, irrespective of whether it impacts on heritage fabric. This will create unnecessary, costly and inefficient consent requirements, and provide no benefits in respect of heritage.	Retain status quo.
3.	Definition - Building	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications (e.g. for swimming pools, decks, balconies, etc).	Retain status quo.
4.	Definition - Building Base	Oppose	This definition is opposed to the extent that it relates to the constraint of building heights, in a manner that is inconsistent with the NPS-UD and is not otherwise necessary or appropriate for the purposes of promoting intensification.	Delete

No.	Provision	Position	Submission	Relief Sought
5.	Definition - Building Tower	Oppose	This definition is opposed to the extent that it relates to the constraint of building heights, in a manner that is inconsistent with the NPS-UD and is not otherwise necessary or appropriate for the purposes of promoting intensification.	Delete
6.	Definition - Building Coverage	Oppose in part	The definition refers to 'building footprint' however that term is not coloured/underlined so as to refer to the corresponding definition.	Amend such that the term 'building footprint' is marked with reference to the corresponding definition of this term.
7.	Definition - Building Footprint	Oppose in part	The definition is not clear, insofar that it refers to refers to 'any section of any of those buildings that extends out beyond the ground floor level limits of the building and overhangs the ground'.	Amend to provide greater clarity.
8.	Definition of 'Contributory building'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Regardless, the proposed definition is vague and provides little certainty as to whether buildings would or would not constitute a contributory building.	Delete.
9.	Definition - Coverage	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
			between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.	
10.	Definition of 'Defining building'	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.</p> <p>Regardless, the proposed definition is vague and provides little certainty as to whether buildings would or would not constitute a defining building.</p>	Delete.
11.	Definition of 'Demolition'	Oppose	The amended definition has the effect of meaning that any destruction of a non-substantial part of a building constitutes 'demolition' and triggers corresponding rules and consent requirements. This will create unnecessary, costly and inefficient consent requirements for inconsequential partial demolition work, create conflict with the definition of 'alteration', and provide no benefits in respect of heritage.	Retain status quo.
12.	Definition – Development site	Support	The proposed definition sensibly enables sites to be defined and assessed for the purposes of compliance, notwithstanding that they may not fall within the mandatory definition of 'site' under the National Planning Standards.	Retain as notified.

No.	Provision	Position	Submission	Relief Sought
13.	Definition – Dripline	Oppose	This definition is deleted, evidently, on the basis that it will be replaced by a new definition of ‘Tree protection zone radius’. The dripline definition is preferred on the basis that it is more readily understood.	Retain status quo.
14.	Definition – Fine grain	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete.
15.	Definition – Ground level	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.	Retain status quo.
16.	Definition – Gust Equivalent Mean (GEM)	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete.
17.	Definition – Habitable room	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation insofar that it refers to ‘a similarly occupied room’.	Delete.

No.	Provision	Position	Submission	Relief Sought
18.	Definition – Heat island	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete.
19.	Definition – Hedge	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete.
20.	Definition – Height	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.	Retain status quo.
21.	Definition of 'Heritage setting'	Oppose	The amended definition removes the wording that a setting <i>'together with the associated heritage item, has met the significance threshold'</i> and instead states that <i>'Heritage settings have not been assessed as meeting the significance threshold for scheduling'</i> . The submitter considers that heritage settings that do not meet the significance threshold for scheduling should not be listed, with associated regulatory requirements.	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
22.	Definition of 'Heritage Building Code works'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for insulation and glazing upgrades.	Retain as proposed.
23.	Definition – Human scale	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete
24.	Definition of 'Intrusive building or site'	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.</p> <p>Regardless, the proposed definition is vague and provides little certainty as to whether buildings or sites would or would not be intrusive.</p>	Delete.
25.	Definition of 'Neutral building or site'	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.</p> <p>Regardless, the proposed definition is vague and provides little certainty as to whether buildings or sites would or would not be categorised as neutral.</p>	Delete.
26.	Definition – Outdoor living space	Support	The definition provides greater clarity and certainty than the status quo.	Retain as notified.

No.	Provision	Position	Submission	Relief Sought
27.	Definition – Pedestrian access	Oppose	The definition (insofar as it refers to a 'dedicated pathway') precludes other forms of pedestrian access or shared spaces that adequately serve the same purpose.	Amend definition as follows: A dedicated pathway that provides a Access for pedestrians from the street to a residential unit and to any parking area for that residential unit
28.	Definition – Perimeter block development	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete
29.	Definition of 'Reconstruction'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for additional forms of reconstruction.	Retain as proposed.
30.	Definition of 'Relocation'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. As such, the submitter opposes the definition of relocation insofar that it relates to heritage areas. Further, the submitter opposes the deletion of the exclusions in (a) and (b) that otherwise sensibly exclude temporary relocation or realignment works.	Retain status quo.
31.	Definition of 'Repairs'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for additional forms of repairs.	Retain as proposed.

No.	Provision	Position	Submission	Relief Sought
32.	Definition – Residential unit	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.	Retain status quo.
33.	Definition of 'Restoration'	Supports	The amended definition provides greater clarity and certainty.	Retain as proposed.
34.	Definition – Site	Oppose	<p>PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.</p> <p>As noted above, the submitter supports the definition 'development site' and the use of this term in relevant rules.</p>	Retain status quo.
35.	Definition – Tree	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete or alternatively amend to specify a potential height of at least 3m.

No.	Provision	Position	Submission	Relief Sought
			Furthermore, the definition is unreasonably restrictive insofar that it specifies a minimum potential height of 5m.	
36.	Definition – Tree canopy cover	Oppose	The definition is very broad and relies on tree cover achieving expected growth over a 20 year time frame. It is unclear how the Council intends to cover the cost of enforcement over a 20+ year time frame for all new developments.	Delete
37.	Definition – Tree protection zone radius	Oppose	The definition is complex and is open to conflicting interpretation. The definition of 'dripline' is preferred.	Delete

No.	Provision	Position	Submission	Relief Sought
Chapter 3 Strategic Directions				
1.	Clause 3.1(v) Introduction	Support	The additional text appropriately recognises the need to <i>'Facilitate an increase in the supply of housing, and provide for a wide range of housing types and locations, to give effect to the [relevant statutory] provisions enabling development...'</i>	Retain as notified.

No.	Provision	Position	Submission	Relief Sought
2.	Objective 3.3.2	Support	The objective is appropriate to ensure the effective and efficient preparation, change, interpretation and implementation of the District Plan.	Retain as notified.
3.	Objective 3.3.7	Oppose	The proposed wording in clauses (a)(i)-(iv) of this objective seeks to define a 'well-functioning urban environment' in a way that does not necessarily reflect, and risks narrowly framing, policy 1 of the NPS-UD. Whilst some aspects of these clauses are appropriate, others are not.	<p>Amend by deleting the text following the words 'into the future' as follows:</p> <p><i>3.3.7 Objective – Well-functioning urban environment</i></p> <p><i>a. A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; including by recognising and providing for;</i></p> <p><i>i. Within commercial and residential zones</i></p> <p>...</p> <p><i>iv. The benefits of urban environments that support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.</i></p>
4.	Objective 3.3.8(viii)	Oppose	The proposed wording in clauses (viii) is not consistent with the requirements of NPS-UD policy 1. As worded, the proposed policy may require outcomes that are not practicable and are not required by NPS-UD policy 1.	<p>Amend as follows:</p> <p><i>viii. Has good Improves overall accessibility <u>for all and connectivity (including through opportunities for walking, cycling and public transport)</u> for people <u>between housing, jobs, community services, natural spaces, and open spaces including by way of public or active transport, transport (including opportunities</u></i></p>

No.	Provision	Position	Submission	Relief Sought
				<i>for walking, cycling and public transport) and services; and</i>
5.	Objective 3.3.10(ii)(E)	Oppose	<p>Consistent with its submissions on sub chapter 6.10A, the submitter considers the provisions relating to tree canopy cover and financial contributions in their entirety are unworkable and onerous.</p> <p>The submitter further notes, that if the Council are wanting to enhance and grow the City's biodiversity and amenity this should also go hand in hand with Council agreeing to accept larger and more frequent recreational reserve areas. Over the past 5 – 7 years Council have pushed back against numerous developer proposals to increase reserve areas which would assist in meeting these proposed objectives.</p>	Delete.

No.	Provision	Position	Submission	Relief Sought
Chapter 6 General Rules & Procedures, Sub Chapter 6.1A Qualifying Matters				
1.	6.1A.1, Table 1 Qualifying Matters	Oppose	Whilst the rationale for qualifying matters expressed in 6.1A.1(a) and (b) is acknowledged, a number of the matters identified in Table 1 are not warranted,	Delete or otherwise amend Table 1 and the extent of Qualifying Matters in a manner consistent with the relief sought by the submitter on other provisions in PC14.

No.	Provision	Position	Submission	Relief Sought
			<p>accounting for the relevant matters in sections 77I or 77O.</p> <p>Among other reasons, a number of qualifying matters are considered to be less enabling of development to more than the extent necessary to accommodate the identified qualifying matters; and/or such matters have not been adequately evaluated and justified accounting for the costs imposed and the limitations on development capacity that is otherwise sought by the NPS-UD.</p> <p>The submitter is particularly concerned with qualifying matters relating to:</p> <p>(a) Heritage areas, items and their settings – noting the operative District Plan provisions relating to heritage adequately provide for such matters.</p> <p>(b) Natural hazards – noting operative District Plan provisions and the submission points above regarding proposed amendments to chapter 5.</p> <p>(c) Residential zones</p> <p>(d) Commercial zones</p>	

No.	Provision	Position	Submission	Relief Sought
Chapter 6 General Rules & Procedures, Sub Chapter 6.10A Tree Canopy Cover and Financial Contributions				
1.	General/all	Oppose	The provisions in their entirety concerning tree canopy cover and financial contributions (including related definitions and amendments to strategic objectives) are unworkable and onerous.	Delete all of the financial contributions draft provisions in their entirety.
2.	6.10A.1	Oppose	The provision begs the question: If trees are retained over and above the 20% cover threshold will a financial credit be provided to the applicant?	
3.	6.10A.1c	Oppose	<p>Greenfield subdivision does not generally cause the loss of tree canopy cover, there is generally a net gain in canopy cover as such subdivision is typically over open paddocks.</p> <p>Furthermore, Council itself has been responsible for a reduced canopy cover through the adoption of policies of density, road widths, off-sets from infrastructure, reduction in reserves to vest, all based around maintenance obligations and council budgets.</p>	
4.	6.10A.1d	Oppose	<p>There is currently no "Urban Forest Plan" setting out the Council target. Therefore, how is anyone expected to know if this is even realistic?</p> <p>This section also refers to financial contributions to cover the cost of tree pits construction within road corridors. This should exclude Greenfield sites where developers are already required as part of their</p>	

No.	Provision	Position	Submission	Relief Sought
			subdivision consent to include street trees within new road corridors.	
5.	Objective 6.10A.2.1	Oppose	<p>For the reasons expressed in the submission points above, the objective is generally opposed.</p> <p>Otherwise, the objective fails to account for the particular characteristics of residential activity, its location or other contextual matters that may make this objective unachievable or inappropriate. For example, residential activities within multi-level apartment buildings in the core of the Central City could not practicably '[maintain] <i>existing trees and/or</i> [plant] <i>new trees as part of the development</i>', as required by the objective.</p>	
6.	Policy 6.10A.2.1.1	Oppose	For the same reasons expressed in regards Objective 6.10A.2.1 and otherwise noting the practical difficulties of monitoring and enforcing the tree canopy percentages over time, this policy is opposed.	
7.	Policy 6.10A.2.1.2	Oppose	<p>For the same reasons expressed in regards to the submission points above, the policy is opposed.</p> <p>Among other things, the maintenance of required tree canopy is impractical to monitor and enforce and requiring financial contributions from those who do not meet the requirements but not from those who may provide the canopy and subsequently remove it. This policy is inequitable and unworkable.</p>	

No.	Provision	Position	Submission	Relief Sought
8.	Policy 6.10A.2.1.3	Oppose	<p>The requirements for tree planting (in terms of location, soil volume, etc) are unnecessarily and unreasonably prescriptive and remove property owners' reasonable freedom and choice to landscape their properties as they choose. Moreover, such requirements are difficult to monitor and enforce on an ongoing basis (e.g. as new owners or tenants choose to re-landscape) and are unnecessary accounting for the control or discretion in regards to these matters where trees are expressly required through resource consent processes.</p> <p>Consent notices in respect of tree planting are an unreasonable and onerous requirement, and are considered impracticable for enforcing residential landscaping which is commonly and regularly altered to reflect changing needs and preferences over time. Consent notices are likely to be overlooked or ignored, or impose costly and inefficient regulatory processes to retrospectively address landscaping works in breach of consent notices.</p> <p>Policies relating to trees in road reserve are unnecessary, noting that such trees can be adequately managed by Council in its capacity as road controlling authority.</p>	
9.	6.10A.3	Oppose	<p>The provisions in this section are generally opposed. Further, clause (c) is considered unclear, insofar as providing 'guidance' on tree species and other 'requirements' and whether these external documents will essentially be imposed as rules.</p>	

No.	Provision	Position	Submission	Relief Sought
10.	6.10A.4	Oppose	The rules are opposed in their entirety for the reasons expressed above.	
11.	6.10A.4(a)	Oppose	The explanatory note setting out the application of the rules is arbitrary, unclear and open to interpretation. Among other concerns, it requires a judgement of whether subdivision or development is 'able to contain a ground floor residential unit' irrespective of whether that is proposed, commercially viable, or otherwise.	
12.	6.10.A.4.1	Oppose	<p>The rules are opposed in their entirety for the reasons expressed above and noting they are arbitrary, unclear and open to interpretation.</p> <p>Among other concerns, the rules apply to 'any residential development except for extensions or accessory buildings...', which might capture non-built improvements (as residential development), such as hard or soft landscaping works, internal alterations, first floor additions, etc.</p>	
13.	6.10.A.4.2	Oppose	<p>The rules are opposed in their entirety for the reasons expressed above and noting they are arbitrary, unclear and open to interpretation and debate. Aside from the monetary costs imposed by the rule, the administration of the rule imposes significant costs insofar as it requires an independent registered valuation.</p> <p>The rules are clearly in conflict with strategic objective 3.3.2.</p>	

No.	Provision	Position	Submission	Relief Sought
14.	6.10.A.4.2.3	Oppose	Consent notices in respect of tree planting are an unreasonable and onerous requirement, and are considered impracticable for enforcing residential landscaping which is commonly and regularly altered to reflect changing needs and preferences over time. Consent notices are likely to be overlooked or ignored, or impose costly and inefficient regulatory processes to retrospectively address landscaping works in breach of consent notices.	

No.	Provision	Position	Submission	Relief Sought
Chapter 7 Transport				
1.	General/all	Oppose	The proposed provisions in their entirety concerning transport are onerous and unnecessary and are not necessary for the purposes of implementing the NPS-UD or the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.	Delete the proposed provisions to the Transport Chapter in their entirety.
2.	Policy 7.2.1.2 (xi) High trip generating activities	Oppose	Requiring the reduction of greenhouse gas emissions from vehicular trips associated with all high trip generating activities is not necessary, practicable or appropriate. Requirements for cycle parking and end of trip facilities, removal of minimum parking	

No.	Provision	Position	Submission	Relief Sought
			requirements, and non-statutory measures such as improved walking/cycling/PT facilities otherwise adequately reduce greenhouse gas emissions from vehicular trips.	
3.	Policy 7.2.1.9 Pedestrian Access	Oppose	The requirements of the policy are onerous, subjective and otherwise unnecessary accounting for the existing provisions in the plan concerning pedestrian access and urban design matters. The submitter is also concerned that requiring all pedestrian access to be of a width and grade suitable for all users, may not be appropriate or practicable in all cases.	
4.	Rule 7.4.3.7(b) Access Design	Oppose	For the reasons expressed in regards policy 7.2.1.9, the requirements for pedestrian access in this rule are opposed.	
5.	Rule 7.4.3.7(d) Access Design	Oppose	The requirement for either an audio and visual warning device or visibility splay for all sites on the same side of the road as a major cycle route in all zones, irrespective of the nature of the activity or its vehicle generation is unnecessary and onerous.	

No.	Provision	Position	Submission	Relief Sought
6.	Rule 7.4.3.8 Vehicle Crossings And Rule 7.4.3.13 Co-location of Vehicle Crossings	Oppose	The requirements in 7.4.3.13 (as referred to in rule 7.4.3.8) are unnecessary, onerous and impractical. Among other concerns, the submitter notes that the rule creates a 'first in first served' situation for vehicle crossings which in greenfield residential areas may be problematic where adjoining sites are designed and / or obtain building consent, resource consents and / or vehicle crossing permits at a similar time with no knowledge of adjacent crossing positions.	
7.	Rule 7.4.4.18(a)(v ii) and advice note vii in Table 1 Assessment matters for high trip generators	Oppose	For the reasons expressed in regards Policy 7.2.1.2 (xi) above, this assessment matter is opposed. Aside from those reasons, the submitter also considers it impractical from a commercial, monitoring and enforcement perspective to require <i>'measures to be implemented and maintained over the lifetime of the activity'</i> .	
8.	Rule 7.4.4.27 Assessment matters for pedestrian access	Oppose	For the reasons expressed in regards Policy 7.2.1.9 and Rule 7.4.3.7(b) above, this assessment matter is opposed.	

No.	Provision	Position	Submission	Relief Sought
9.	Rule 7.4.4.28 Assessment matters for vehicle crossing co location	Oppose	For the reasons expressed in regards Rule 7.4.3.8 above, this assessment matter is opposed.	
10.	Table 7.5.2.1 – Minimum numbers of cycle parks required	Oppose	Increased requirements for cycle parking for social housing and residential units are opposed on the basis that the requirements are prescriptive and inflexible, and any additional cycle parking needs are best determined by the developer accounting for the needs of future residents, or informally provided as required. The proposed amendments will add unnecessary development costs, or onerous consenting requirements and will likely reduce development capacity.	
11.	Table 7.5.3.1 – Minimum numbers of loading spaces required	Oppose	Requirements for on-site loading for residential activities are opposed on the basis that the requirements are prescriptive and inflexible, and any loading needs are best determined by the developer accounting for the needs of future residents, or informally provided as required (including through on-street loading facilities). Requiring on-site loading (where car parking is not otherwise required and loading is not	

No.	Provision	Position	Submission	Relief Sought
			<p>presently required) will reduce development capacity and/or significantly increase the costs of development, accounting for the corresponding requirements for on-site access (and other requirements, such as on site turning, vehicle crossing constraints, etc) to facilitate on site loading. Informal loading, or temporary or permanent loading on-street is more effective, efficient and appropriate.</p> <p>The proposed amendments will otherwise add unnecessary development costs, or onerous consenting requirements.</p>	
12.	Appendix 7.5.7 Access design and gradient	Oppose	The amended requirements for access are unnecessary and will result in unreasonable development costs, reduced development capacity, and/or onerous consenting requirements.	

No.	Provision	Position	Submission	Relief Sought
Chapter 8 Subdivision, Development and Earthworks				
1.	8.1 Introduction	Oppose in part	To the extent that additional wording is proposed that specifically refers to 'development' a definition or further clarification of what this term relates to is necessary. In the absence of such	Delete, or provide a definition or explanation of the term 'development'.

No.	Provision	Position	Submission	Relief Sought
			clarification, the term is unclear and open to interpretation	
2.	8.2.2.2 Policy Allotments	Support	The amendments are pragmatic and support the provision of increased development capacity or alternative forms of housing supply and associated changes in tenure.	Retain.
3.	Policy 8.2.2.7 Urban density	Support	The amendments are pragmatic and support the provision of increased development capacity, whilst sensibly recognising constraints to achievement of minimum yields and other development constraints.	Retain.
4.	Objective 8.2.3 Infrastructure and transport	Support	The objective sensibly provides for engineering solutions that do not affect the 'existing' capacity of the wastewater system, without prescriptively limiting what those solutions may entail.	Retain.
5.	Policy 8.2.3.1 Infrastructure constraints	Oppose in part	To the extent that additional wording is proposed that specifically refers to 'development' a definition or further clarification of what this term relates to is necessary. In the absence of such clarification, the term is unclear and open to interpretation	Delete, or provide a definition or explanation of the term 'development'.
6.	Policy 8.2.3.2 Availability of infrastructure	Oppose in part	To the extent that additional wording is proposed that specifically refers to 'development' a definition or further	Delete, or provide a definition or explanation of the term 'development'.

No.	Provision	Position	Submission	Relief Sought
			<p>clarification of what this term relates to is necessary. In the absence of such clarification, the term is unclear and open to interpretation.</p> <p>Clause (g) is otherwise supported for the same reasons expressed in respect of objective 8.2.3 above.</p>	
7.	Objective 8.2.6 and policies 8.2.6.1-8.2.6.3 Urban tree canopy cover	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete
8.	Rule 8.3.1 (e) and (f) Urban tree canopy cover	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete
9.	Rule 8.3.3 (b) financial contributions	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete
10.	Rule 8.3.7 consent notice	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete

No.	Provision	Position	Submission	Relief Sought
11.	Rule 8.4.1.1 Notification	Support	The amended notification requirements are supported, accounting for the directions in the EHS Act.	Retain as notified.
12.	Rule 8.5	Support	The provisions are generally supported, to the extent that they are consistent with the submitters other submission points.	Retain as notified.
13.	Rule 8.6.1 Table 1 – Minimum net site areas - residential	Oppose in part	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Further, the proposed 450m2 minimum net site area is opposed on the basis that it conflicts with the objectives in the NPS-UD and District Plan to provide for the most intensive and efficient scale and form of development within Central City areas.	Delete.
14.	Rule 8.6.1 Tables 2 – 5 Minimum net site areas – other zones	Support	The amendments proposed to Tables 2-5 are supported.	Retain the changes as proposed to Rule 8.6.1 Tables 2 – 5.
15.	Rule 8.7.12 Tree canopy assessment matters	Oppose	For the reasons expressed in further detail in the submitter’s submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete.

No.	Provision	Position	Submission	Relief Sought
16.	8.9 Rules- Earthworks	Support	The amended provisions in rule 8.9 are generally appropriate.	Retain as notified.

No.	Provision	Position	Submission	Relief Sought
Chapter 9 Natural and Cultural Heritage, Sub Chapter 9.3 Historic Heritage				
1.	Policy 9.3.2.2.2 Identification, assessment and scheduling of heritage areas	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.	Delete.
2.	Policy 9.3.2.2.3 - Management of scheduled historic heritage	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. The amendments to clause (b) of this policy are also opposed. The operative wording within this policy sensibly recognises that Significant (Group 2) heritage items are potentially capable of accommodating a greater degree of change than Highly Significant (Group 1) heritage items.	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
3.	Policy 9.3.2.2.5 Ongoing use of scheduled historic heritage	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to this policy are opposed.	Retain status quo.
4.	Policy 9.3.2.2.8- Demolition of scheduled historic heritage	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to clause (a) of this policy are opposed.</p> <p>In addition, the changes to clause (a)(ii) are opposed insofar that they introduce a new 'test' for evaluating the demolition of historic heritage that presents an unreasonable and inappropriate threshold that materially changes and undermines the policy. By way of example, the proposed wording may preclude the demolition of heritage items that are significantly (physically) compromised, on the basis of one or more (non-physical) heritage values (e.g. historical/social or cultural/spiritual value) remaining.</p>	Retain status quo.
5.	Rule 9.3.3 How to interpret and	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the	Delete all references to heritage areas.

No.	Provision	Position	Submission	Relief Sought
	apply the rules		changes to this rule, insofar that they relate to heritage areas are opposed.	
6.	9.3.4 Rules- Historic heritage	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, changes to this rule, insofar as they relate to heritage areas are opposed.	Delete all references to heritage areas within rule 9.3.4, including (and in particular) rules RD6-RD8.
7.	Matters of discretion 9.3.6.1(a)	Oppose	The submitter opposes the deletion of clause (a), given that damage incurred as a result of the Canterbury earthquakes of 2010 and 2011 including the costs of repair and reconstruction, remains a relevant matter for consideration.	Retain status quo for 9.3.6.1(a).
8.	Matters of discretion 9.3.6.1(p)	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters under clause (p) are opposed.	Delete proposed 9.3.6.1(p).
9.	Matters of discretion 9.3.6.4	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters in rule 9.3.6.4 are opposed.	Delete proposed rule 9.3.6.4.

No.	Provision	Position	Submission	Relief Sought
10.	Matters of discretion 9.3.6.5	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters in rule 9.3.6.5 are opposed.	Delete proposed rule 9.3.6.5.
11.	Matters of discretion 9.3.6.6	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters in rule 9.3.6.6 are opposed.	Delete proposed rule 9.3.6.6.
12.	Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items	Oppose	For the reasons stated in the covering submission, the listing of the item and setting at 32 Armagh Street (and 325 Montreal Street) is inappropriate. Accordingly, this listing should be deleted.	Delete Heritage Item 390 and Heritage Setting 287 regarding 32 Armagh Street from Appendix 9.3.7.2.
13.	Appendix 9.3.7.3 Schedule of Significant Historic Heritage Areas	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to this schedule are opposed.	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
14.	Appendix 9.3.7.4 Heritage item and heritage setting exemptions	Oppose	The exemptions provided in Appendix 9.3.7.4 are an important tool for incentivising the adaptive reuse and ongoing protection of heritage items. As such, the amendments proposed to this appendix which reduce the extent of exemptions is inconsistent with the Plan's objectives in relation to heritage and section 6 of the Act.	Retain the status quo.
15.	Appendix 9.3.7.7 – Residential Heritage Areas - Aerial Maps	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Appendix 9.3.7.7 should be deleted.	Delete.
16.	Appendix 9.3.7.8 – Residential Heritage Areas – Site Contributions Maps	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Appendix 9.3.7.8 should be deleted.	Delete.
17.	Appendix 9.3.7.9 – Residential Heritage Areas – Interface Sites and	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Appendix 9.3.7.9 should be deleted.	Delete.

No.	Provision	Position	Submission	Relief Sought
	Character Area Overlay Maps			

No.	Provision	Position	Submission	Relief Sought
Chapter 13.6 SP School				
1.	Policy 13.6.2.1.2 Effects on neighbourhoods	Support	The amended wording of this policy heading better reflects the provisions in the NPS-UD and is supported.	Adopt.
2.	13.6.4.1.3 Restricted discretionary activities	Support	The amended wording within the table (insofar as it refers to 'Effects on...') better reflects the provisions in the NPS-UD and is supported.	Adopt.
3.	13.6.4.1.3 RD5	Support in part	The proposed rule is generally supported, however restricted discretionary status is not 'enabling' and accounting for the development intensity envisaged by the NPS-UD in high density residential areas, the submitter considers controlled activity status for this provision is more appropriate.	Amend rule 13.6.4.1.3 RD5, such that it is a controlled activity standard.

No.	Provision	Position	Submission	Relief Sought
4.	13.6.4.2.1 Maximum site coverage	Oppose in part	The submitter opposes the amendments to the rule, to the extent that it will impose greater constraints on building site coverage than the status quo. This will limit development capacity in a manner that is inconsistent with the NPS-UD.	Retain the status quo, insofar that the amendments propose greater constraints on building site coverage than the status quo.
5.	13.6.4.2.2 Height in relation to boundary	Oppose in part	The submitter opposes the amendments to the rule, to the extent that it will impose greater constraints on building height in relation to boundaries than the status quo. This will limit development capacity in a manner that is inconsistent with the NPS-UD.	Retain the status quo, insofar that the amendments propose greater constraints on building height in relation to boundaries than the status quo.
6.	13.6.4.2.3 Minimum building setback from road boundaries	Oppose in part	The submitter opposes the amendments to the rule, to the extent that it will impose greater building setbacks from road boundaries than the status quo. This will limit development capacity in a manner that is inconsistent with the NPS-UD.	Retain the status quo, insofar that the amendments propose greater building setbacks from road boundaries than the status quo.
7.	13.6.4.2.4 Minimum building setback from internal boundaries and maximum	Oppose in part	The submitter opposes the amendments to the rule, to the extent that it will impose greater building setbacks from internal boundaries and/or constraints on building length, relative to the status quo. This will limit development capacity in a manner that is inconsistent with the NPS-UD.	Retain the status quo, insofar that the amendments propose greater building setbacks from internal boundaries and/or constraints on building length, relative to the status quo.

No.	Provision	Position	Submission	Relief Sought
	building length			
8.	13.6.4.2.5 Maximum building height	Support	The amendments better enable development capacity and are supported.	Adopt.
9.	13.6.4.2.6 Landscaping	Oppose	The submitter opposes this new rule, noting it will limit development capacity in a manner that is inconsistent with the NPS-UD.	Delete.
10.	13.6.5.1 Effects on the neighbourhood	Oppose	The submitter opposes the proposed amendments to the assessment matter, noting it will impose additional constraints on and uncertainty for developments, and in doing so will limit development capacity in a manner that is inconsistent with the NPS-UD.	Delete.
11.	Appendix 13.6.6.2 State Integrated Schools	Support in part	<p>The Diocese seek that the alternative zoning of their integrated school sites appropriately reflects the likely future use of the land by the Diocese, whilst also accounting for the surrounding environment.</p> <p>The identification of alternative zones in the Appendix is generally supported, however the Diocese seeks the following amendments:</p>	<p>Amend Appendix 13.6.6.2 State Integrated Schools, so that the alternative zone for:</p> <ul style="list-style-type: none"> • St Mary's School at Manchester Street is 'CCMUZ'; and • St Teresa's on Puriri Street is 'HRZ' <p>Otherwise, retain the wording in the Appendix, insofar as it relates to the alternative zoning of all other state integrated schools.</p>

No.	Provision	Position	Submission	Relief Sought
			<ul style="list-style-type: none"> St Mary's school in Manchester Street is identified in this appendix with an underlying zoning of HRZ. This is opposed, and CCMUZ is sought as the underlying zone to better provide for spiritual activities on the site and align with the CCMUZ on the opposite side of Manchester Street. St Teresa's on Puriri Street, Riccarton is identified with an underlying MRZ. However, given the site's position adjacent to Riccarton Road, proximity to the Riccarton KAC, and the extent of the HRZ nearby, an underlying zoning of HRZ is considered more appropriate. 	

No.	Provision	Position	Submission	Relief Sought
Chapter 14 Residential				
Objectives & Policies				
1.	Objective 14.2.1	Support	The amendments to the objective are appropriate and better reflect the provisions of the NPS-UD.	Adopt.

No.	Provision	Position	Submission	Relief Sought
2.	Policy 14.2.1.1	Support	The amendments to the policy are appropriate and better reflect the provisions of the NPS-UD. They otherwise appropriately remove unnecessarily prescriptive references to minimum densities for different zones.	Adopt.
3.	Policy 14.2.1.2	Support	The deletion of the policy is supported.	Adopt
4.	Policy 14.2.1.2	Support	The deletion of the policy is supported, accounting for the changes proposed in response to the NPS-UD and Amendment Act.	Adopt
5.	Policy 14.2.1.3	Support	The deletion of the policy is supported, accounting for the changes proposed in response to the NPS-UD and Amendment Act.	Adopt
6.	Policy 14.2.3.6	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt
7.	Policy 14.2.3.7	Oppose	The proposed policy is opposed, insofar as it states that increased buildings heights should 'only' be provided for where the matters listed in i-v. of the policy are achieved. Such requirements are not	Delete.

No.	Provision	Position	Submission	Relief Sought
			required by or consistent with the NPS-UD and Amendment Act.	
8.	Objective 14.2.5	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
9.	Policy 14.2.5.1	Oppose	The proposed policy is opposed, insofar as it stipulates site layout and building design requirements that are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.	Delete.
10.	Policy 14.2.5.2	Support	The proposed amendments to the policy are supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
11.	Policy 14.2.5.3	Oppose	The proposed policy is opposed, insofar as it stipulates site layout and building and landscaping design requirements that are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.	Delete.
12.	Policy 14.2.5.4	Oppose	The proposed policy is opposed, insofar as it stipulates on site waste and recycling requirements that are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.	Delete.

No.	Provision	Position	Submission	Relief Sought
13.	Policy 14.2.5.5	Oppose	<p>The proposed policy is opposed, insofar as it stipulates wind management requirements that are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.</p> <p>The submitter is particularly concerned at the cost and practical implications of providing assessments in accordance with this policy, noting the highly specialised expertise required (with associated cost, availability and time implications).</p> <p>The submitter is also concerned at the potentially subjective nature of aspects of the policy.</p>	Delete.
14.	Policy 14.2.5.6	Support	The proposed amendments to the policy are supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
15.	Objective 14.2.6	Support	The proposed objective is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
16.	Policy 14.2.6.2	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.

No.	Provision	Position	Submission	Relief Sought
17.	Objective 14.2.7	Support	The proposed objective is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
18.	Policy 14.2.7.1	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
19.	Policy 14.2.7.2	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
20.	Policy 14.2.7.3	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
21.	Policy 14.2.7.4	Support in part	The proposed policy is generally supported, accounting for the directives within the NPS-UD and Amendment Act. However, the submitter is concerned as to the potentially inappropriate constraints on development resulting from the words 'and restrict development to solely within...'	Amend to delete the words ',and restrict development to solely within,'.
22.	Policy 14.2.7.5	Support	The proposed policy is generally supported, accounting for the directives within the NPS-UD and Amendment Act. However, the submitter is concerned as to the potentially inappropriate constraints on development	Amend to delete the words ',and restrict development to solely within,'.

No.	Provision	Position	Submission	Relief Sought
			resulting from the words 'and restrict development to solely within...'	
23.	Policy 14.2.7.6	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
24.	Objective 14.2.8	Support	The proposed objective is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
Rules Introduction				
1.	14.3 (f)	Oppose	For the reasons set out in their submission on sub chapter 6.1A, the submitter opposes the extent of qualifying matters listed and seeks that this rule be amended in a manner consistent with the relief sought on that chapter.	Delete, in a manner consistent with the submission on chapter 6.1A.
RS and RSDT Zones				
1.	Rule 14.5.3.1.3 Area-specific restricted discretionary activities	Oppose.	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 14.5.3.1.3 should be deleted.	Delete.
2.	Rule 14.4.2.2 Tree and	Oppose	The proposed amendments incorporating tree planting rules are opposed for the	Delete.

No.	Provision	Position	Submission	Relief Sought
	garden planting		reasons expressed in regards Chapter 6.10A.	
RMD Zones				
1.	Rule 14.5	Oppose	<p>The submitter generally opposes any/all amendments to the RMD zone provisions, to the extent that these conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.</p> <p>In the submitter's view, such requirements are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.</p> <p>Specific provisions of concern are further noted in the submission points below.</p>	Delete all new or amended provisions, to the extent that they conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.
2.	Rule 14.5.2 Built form standards	Oppose	<p>Proposed new built form standards or amendments to existing standards are opposed to the extent that they conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.</p> <p>Specific amendments requiring deletion include:</p>	Delete all new or amended provisions, to the extent that they conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.

No.	Provision	Position	Submission	Relief Sought
			<p>Rule 14.5.2.2 (c)-(e) – landscaping & tree canopy</p> <p>Rule 14.5.2.9 - fences</p> <p>Rule 14.5.2.12 – ground floor habitable room</p> <p>Rule 14.5.2.13 – service, storage & waste spaces</p> <p>Rule 14.5.2.15 – garaging and carport location</p> <p>Rule 14.5.2.17 – location of mechanical ventilation</p> <p>Rule 14.5.2.18 – City Spine Transport corridor</p>	
3.	Rule 14.5.2.4 (c) Site coverage	Support	The exemption for eaves and roof overhangs is supported.	Adopt.
4.	Rule 14.5.3.1.3 Area-specific restricted discretionary	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 14.5.3.1.3 RD15 should be deleted.	Delete.

No.	Provision	Position	Submission	Relief Sought
	activities RD15			
5.	Rule 14.5.3.2 Area-specific built form standards	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 14.5.3.2 should be deleted, insofar that this concerns heritage areas. This includes:</p> <p>Rule 14.5.3.2.3 Building Height</p> <p>Rule 14.5.3.2.7 Residential units per site</p> <p>14.5.3.2.8 Setbacks</p> <p>14.5.3.2.9 Building coverage</p> <p>14.5.3.2.10 Outdoor living space per unit</p>	<p>Delete the following rules, insofar that they refer to Heritage areas:</p> <p>Rule 14.5.3.2.3 Building Height</p> <p>Rule 14.5.3.2.7 Residential units per site</p> <p>14.5.3.2.8 Setbacks</p> <p>14.5.3.2.9 Building coverage</p> <p>14.5.3.2.10 Outdoor living space per unit</p>
High Density Residential Zone Provisions				
1.	Rule 14.6	Oppose	<p>The submitter generally opposes any/all amendments to the High Density Residential zone provisions, to the extent that these conflict with or are less enabling than the mandatory MDRS, the directives in NPS-UD policy 3, and/or impose additional constraints relative to the status quo.</p> <p>In the submitter's view, such requirements are not otherwise required by, or are</p>	<p>Delete all new or amended provisions, to the extent that they conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.</p>

No.	Provision	Position	Submission	Relief Sought
			<p>inconsistent with, the NPS-UD and Amendment Act.</p> <p>Specific provisions of concern are further noted in the submission points below.</p>	
2.	Rule 14.6.1.3	Oppose	<p>Rules 14.6.1.3 RD6-RD23 entail requirements that are onerous, inefficient and ineffective and which will limit development capacity. Such requirements are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.</p> <p>A number of these standards are complex or unclear and do not accord with the requirements of objective 3.3.2.</p> <p>As restricted discretionary activities, these standards are not enabling of development, as required by the Amendment Act. If such standards are found to be appropriate, they should be imposed as controlled activity standards.</p>	Delete, to the extent that the proposed amendments conflict with or are less enabling than the mandatory MDRS.
3.	Rule 14.6.2.1 Building height	Oppose, in part	Whilst provision for increased building height is supported, a 14m building height is inadequate for a high density residential zone within the central city, where Policy 3 (c) of the NPS-UD directs that development of up to six stories is to be 'enabled'.	Amend, so as to provide for a 23m maximum building height.

No.	Provision	Position	Submission	Relief Sought
			In order to 'enable' development of up to six stories a height limit of 23m as a permitted activity is required for this zone.	
4.	Rule 14.6.2.2 height in relation to boundary And Appendix 14.16.2	Oppose	<p>The submitter opposes the height in relation to boundary QM and submits that only the angles and heights that must be included from Schedule 3A, Part 2, Density Standards (12) Height in Relation to Boundary of the Housing Supply Act be included in the District Plan.</p> <p>The QM/ appendix compromises the enablement of development and does not reduce regulatory constraints and increase housing supply as required through the Amendment Act and the NPS-UD.</p>	Amend Rule 14.6.2.2 and Appendix 14.16.2, to align with Schedule 3A, Part 2, Density Standards (12) Height in Relation to Boundary of the Amendment Act.
5.	Rule 14.6.2.5 Building separation	Oppose	The requirements of this rule are not required by and are inconsistent with, the NPS-UD and Amendment Act.	Delete.
6.	Rule 14.6.2.6 Fencing and screening	Oppose	The requirements of this rule are not required by and are inconsistent with, the NPS-UD and Amendment Act.	Delete.
7.	Rule 14.6.2.7 Landscaping and tree canopy cover	Oppose	The requirements of this rule are not required by and are inconsistent with, the NPS-UD and Amendment Act. The requirements will limit development capacity	Delete.

No.	Provision	Position	Submission	Relief Sought
			and are otherwise opposed for the reasons expressed in the submission on chapter 6.10A.	
8.	14.6.2.12 Building Coverage	Oppose	<p>50% site coverage is not appropriate in the HRZ Zone given that there are currently no building coverage limitations in the Residential Central City Zone. This rule is more restrictive than the current operative provisions. There should be no site coverage limit in the HRZ.</p> <p>The rule compromises the extent to which planning provisions enable development and does not reduce regulatory constraints and increase housing supply as required through the Amendment Act and the NPS-UD.</p>	Delete.
9.	<p>Rule 14.15.3(a) impacts on neighbouring property</p> <p>Matters of control and discretion</p>	Oppose	<p>The submitter considers that Clause 14.15.3 (a) need simplifying and amending to ensure it appropriately addresses the rules to which it relates. The rule is headed 'impacts on neighbouring properties' yet many of the matters do not relate to effects on neighbouring properties. The long list of matters is not in accordance with the enabling provisions of the NPS-UD.</p> <p>The extent of discretion compromises the extent to which planning provisions enable development and does not reduce regulatory constraints and increase housing supply as</p>	<p>Amend rule 14.15.3(a) as follows:</p> <p><i>a. Whether the increased height, or reduced setbacks, or recession plane intrusion would result in buildings that do not compromise the amenity of adjacent properties planned urban built character. taking into account. The following matters of discretion apply...</i></p> <p>[i.e. delete the balance of clause (a)]</p>

No.	Provision	Position	Submission	Relief Sought
			required through the Amendment Act and the NPS-UD.	

No.	Provision	Position	Submission	Relief Sought
Chapter 15 Commercial				
Chapter 15 objectives & policies:				
1.	General feedback re policies	Oppose	PC14 fails to include policy provisions that explicitly implement the NPS-UD directives in Policy 3 in regards to building height and provide clear expectations in regards to the heights of buildings, particularly in the central city.	Insert a new and explicit policy in regards to anticipated building heights, consistent with NPS-UD policy 3.
2.	Policy 15.2.2.1 (Role of Centres)	Support with amendment	<p>Amendments anticipating 'high' rather than 'medium' density housing in and around town centre and local centre zones are generally supported.</p> <p>In respect of Table 15.1, Avonhead Mall is identified as a 'small' Local Centre, which has corresponding implications in respect of development potential. In respect of building height especially, such centres are constrained to 12m building height which is equivalent to the height permitted in surrounding residential zones and limits the</p>	Amend Table 15.1 to reclassify Avonhead as a Local Centre (<u>large</u>), rather than Local Centre (small).

No.	Provision	Position	Submission	Relief Sought
			<p>potential/practical intensification of this commercially zoned land resource.</p> <p>Given the extent of intensification provided for in the surrounding residential catchment (and likely increase in population as a consequence) and the absence of other commercial centres and activity in this catchment, a corresponding level of intensification at Avonhead mall is appropriate.</p> <p>Such intensification could occur without escalating the status of Avonhead in the commercial centres hierarchy (to a TCZ) by reclassifying the centre as a Local Centre (large).</p>	
3.	Objective 15.2.3 (Office parks & mixed use areas)	Support	The wording of this provision is generally supported.	Adopt.
4.	Policy 15.2.3.2 (Mixed use areas)	Support	The wording of this provision is generally supported.	Adopt.

No.	Provision	Position	Submission	Relief Sought
5.	Objective 15.2.4 (urban form, scale & design outcomes)	Support with amendment	<p>With the exception of clauses (a)(iv) and (vi) the wording is supported.</p> <p>In respect of clause (a)(iv) and (vi) the requirement for individual developments to 'manage adverse effects... that contribute to climate change' and 'support a reduction in greenhouse gas emissions' is uncertain and difficult to apply/administer for individual applications.</p> <p>Whilst such objectives are commendable, they should be directed at broader patterns of development rather than individual applications.</p>	<p>Amend clause (a)(iv) and (vi) as follows:</p> <p><i>iv. manages adverse effects (including reverse sensitivity effects) on the site and surrounding environment, including effects that contribute to climate change; and</i></p> <p><i>... vi. Promotes a zoning and development framework that supports a reduction in greenhouse gas emissions.</i></p>
6.	Policy 15.2.4.1 (Scale & form of development)	Oppose in part	<p>The proposed amendments to clause (a) of this policy introduce wording that is unclear, subjective and inappropriate. Clause (a) also seeks to constrain building heights and form within the central city in a manner that is inconsistent with the NPS-UD and the Amendment Act.</p> <p>Clause (b) of the policy is supported.</p>	<p>Delete the amendments to clause (a) of the policy.</p> <p>Adopt the amendments to clause (b) of the policy.</p>
7.	Policy 15.2.4.2 (Design of new development)	Oppose in part	<p>Clause (a) of this policy 'requires' new development to meet the various requirements listed in sub-clauses (i)-(x). Accordingly, it is important that those requirements are appropriately framed in terms of the outcomes sought, the certainty</p>	<p>Amend clause (a) of the policy as follows:</p> <p><i>a. Require new development to be well-designed and laid out by:</i></p> <p>...</p>

No.	Provision	Position	Submission	Relief Sought
			<p>they provide and the extent to which they support the purpose of PC14 to 'enable a greater scale and density of residential and business development in urban areas'.</p> <p>Against this context, the proposed amendments to this policy are opposed on the basis that they are uncertain, unreasonable, and/or do not support the purpose of PC14.</p> <p>Proposed amendments to the balance of the policy are supported.</p>	<p><i>viii. achieving a visually <u>appealing attractive</u> setting when viewed from the street and other public spaces, <u>that embodies a human scale and fine grain</u>, while managing effects on adjoining environments;</i></p> <p>[delete proposed clauses x-xv.]</p> <p>Retain the balance of the policy and amendments as proposed.</p>
8.	Policy 15.2.5.1 (Cathedrals in the Central City)	Oppose in part	Amend the policy to include reference to all three potential new cathedral sites as set out in the covering submission. Noting that part of the Barbadoes Street Site is already included in this Policy.	Amend Policy 15.2.5.1 to provide for a new catholic cathedral at one of the three sites identified in the covering submission.
9.	Policy 15.2.6.3 (Amenity)	Oppose in part	The proposed wording in clause (a)(ii) is opposed, insofar that this relates to constraints on built form which limit development capacity in a manner that is inconsistent with the NPS-UD and Amendment Act.	Delete the proposed amendments in clause (a)(ii).
10.	Policy 15.2.6.4	Oppose in part	Whilst <i>some</i> of the proposed additions to this policy concern matters that may be relevant considerations for new residential developments (e.g. as assessment matters),	Delete the proposed amendments in clauses (a)(vi)-(viii).

No.	Provision	Position	Submission	Relief Sought
	(Residential intensification)		<p><i>requiring</i> such matters within the policy potentially escalates their importance and may impose a 'policy barrier' to applications where the provision these requirements is not appropriate, necessary, or practicable.</p> <p>And, as set out in other submission points, a number of these matters are considered unnecessary and inappropriate, for the purposes of promoting intensification.</p> <p>Accordingly, the proposed additions to the sub-clauses within the policy should be deleted.</p>	
11.	Policy 15.2.6.5 (Pedestrian focus)	Oppose	<p>As set out in other submission points, controls on wind generation are opposed due to the difficulties of evaluating such effects with certainty and the practical limitations on obtaining such assessments. Moreover, changes to wind generation and the pedestrian environment are a necessary tradeoff contemplated by the NPS-UD, insofar as it directs maximum intensification of central city environments.</p> <p>The proposed amendment is otherwise unnecessary and inappropriate, for the purposes of promoting intensification.</p> <p>Accordingly, the proposed addition to the policy should be deleted.</p>	Delete.

No.	Provision	Position	Submission	Relief Sought
12.	Policy 15.2.7.1 (Diversity of activities)	Support	The policy is an enabling policy encouraging a diversity of activities and the amendments are supported.	Adopt.
13.	Policy 15.2.8.1 (Usability & adaptability)	Oppose	<p>The proposed addition of subclauses (a)(iv)-(vi) is opposed on the basis that such requirements do not reflect the operational and functional requirements of activities and buildings within the CCMUZ.</p> <p>If such requirements are intended to apply only to new residential developments, then the policy should be drafted to make this explicit (as is the case with policy 15.2.8.2 or clause vi. for example).</p>	<p>Delete subclauses (a)(iv)-(vi) of the policy as follows:</p> <p><i>a. Encourage a built form where the usability and adaptability of sites and buildings are enhanced by:</i></p> <p><i>iv. providing dedicated pedestrian access for each activity within a development, directly accessed from the street or other publicly accessible space;</i></p> <p><i>v. providing sufficient setbacks and glazing at the street frontage; and</i></p> <p><i>vi. where residential activity is located at the ground floor, ensuring the design of development contributes to the activation of the street and other public spaces.</i></p>
14.	Policy 15.2.8.2 (Amenity & effects)	Support with amendment	<p>With the exception of subclauses (a)(iv) and (vi) and the addition of the word 'including' in the prefacing text, the policy is generally supported.</p> <p>Subclause (a)(v) is opposed on the basis that: 'locating outdoor service space and car parking away from street frontages and entrances to buildings' may not always be</p>	Delete subclauses (a)(v) and (viii) of the policy.

No.	Provision	Position	Submission	Relief Sought
			<p>practicable or desirable and may establish a policy barrier to activities in such cases.</p> <p>Subclause (a)(viii) is opposed on the basis that urban design assessments impose unnecessary time, cost, and uncertainty for developments and built form standards provide a preferable method for managing development and providing certainty to all parties.</p> <p>The proposed amendments are otherwise unnecessary and inappropriate, for the purposes of promoting intensification.</p> <p>Accordingly, the proposed additions to the policy should be deleted.</p>	

Chapter 15 – Commercial Central City Zone Provisions:				
1.	Rule 15.11.1.1 P13 (CCZ residential activity)	Oppose	Proposed changes to clauses (e) and (f) regarding minimum outdoor living space requirements and new clauses (h) and (i) regarding outlook space are opposed. Such rules amount to greater regulatory constraint on residential development and are therefore not enabling of intensification. Accordingly, such changes should be deleted.	Delete.
2.	Rule 15.5.1.3 RD1 (LCZ- RDA consent requirements)	Oppose	For the reasons set out above in respect of Rule P21, the amendments to rule RD1 (which specify a requirement for consent for a breach of the proposed additional rules in P21) are also opposed. As stated above, such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty. Accordingly, these amendments should be deleted.	Retain the status quo in respect of Rule 15.5.1.3 RD1.
3.	Rule 15.5.2.2	Support	The proposed amendments to this rule support the purpose of PC14 in respect of intensification and are supported.	Retain the amendments as proposed.

	(LCZ- Building height)			
4.	Rule 15.5.2.5 (LCZ- Height in relation to boundary)	Support	The proposed amendments to this rule support the purpose of PC14 in respect of intensification and are supported.	Retain the amendments as proposed.
Chapter 15 – Commercial Central City Zone Provisions:				
1.	Rule 15.11.1.1 P13 (CCZ residential activity)	Oppose	Proposed changes to clauses (e) and (f) regarding minimum outdoor living space requirements and new clauses (h) and (i) regarding outlook space are opposed. Such rules amount to greater regulatory constraint on residential development and are therefore not enabling of intensification. Accordingly, such changes should be deleted.	Delete.
2.	Rule 15.11.1.2 C1 Controlled activities	Oppose in part	The submitter supports certification as a method and considers its application should not be limited to buildings 28m or less in height, or those compliant with rules 15.11.2.3 (sunlight and outlook for the street) or 15.11.2.12 (road wall height), given that such buildings will trigger restricted discretionary activity status in respect of those rules and provide Council with discretion to consider the corresponding	Amend Rule 15.11.1.2 C1 as follows: <i>a. Any new building, external alteration to any existing building, or the use of any part of a site not occupied by a building, for an activity listed in Rule 15.101.1.1 P1 to P17, which is:</i> <i>i. within the Central City Core area <u>28m or less in height; and</u></i> <i>ii. <u>visible from a publicly owned and accessible space; and</u></i>

			assessment matters. To the extent that the urban design outcomes are otherwise achieved, this can still be assessed and certified by an independent urban design expert.	<p><i>iii. meets the following built form standards:</i></p> <p><i><u>A. Rule 15.11.2.3 Sunlight and outlook for the street; and/or</u></i></p> <p><i><u>B. Rule 15.11.2.12 Maximum road wall height;</u></i></p> <p><i>iv. iii. is certified by a qualified expert on a Council approved list as meeting each of the urban design provisions/ outcomes...</i></p>
3.	<p>Rule 15.11.1.3 RD5</p> <p>(CCZ- RDA consent requirement)</p>	Oppose	<p>For the reasons set out below in respect of the corresponding built form standards that are proposed, the amendments to rule RD5 are also opposed, noting these specify a requirement for consent for a breach of the following new rules:</p> <ul style="list-style-type: none"> A. Maximum building height B. Upper floor setbacks C. Tower dimension, site coverage and separation D. Wind <p>As stated below, such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	<p>Retain the status quo in respect of Rule 15.11.1.3 RD5.</p>

4.	Rule 15.11.1.3 RD11 (CCZ- RDA consent requirement)	Oppose	For the reasons set out below in further detail in respect of the building height built form standard (Rule 15.11.2.11 Building Height), this rule is opposed and should be deleted.	Delete.
5.	Rule 15.11.1.4 D1 (CCZ- DA consent requirement)	Oppose	Retaining discretionary status for a breach of building height and road wall height is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted. Building height and road wall height should be provided for as a permitted activity noting the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1).	Delete Rule 15.11.1.4 D1 in its entirety.
6.	Rule 15.11.2.3 Sunlight and outlook for the street	Support	The proposed amendments to this rule support the purpose of PC14 in respect of intensification and are supported.	Adopt.
7.	Rule 15.11.2.9 Sunlight and outlook at the boundary with a	Support	The proposed amendments to this rule support the purpose of PC14 in respect of intensification and are supported.	Adopt.

	residential zone			
8.	Rule 15.11.2.11 Building Height	Oppose	<p>The height limits in this rule are opposed in their entirety by the submitter.</p> <p>Among other reasons:</p> <ul style="list-style-type: none"> • The rules are fundamentally inconsistent with the requirements in policy 3 of the NPS-UD to '<i>enable... building heights and density of built form to realise as much development capacity as possible, to maximise benefits of intensification</i>'. Policy 3 was drafted specifically for New Zealand's Tier 1 cities – all of which feature heritage sites and buildings – indicating such built form is envisaged alongside these features. • The variable height limits for different parts of the city are arbitrary, inconsistent and inequitable. • To the extent that variable height limits are proposed in response to heritage values/features, this incorrectly assumes that building height and high density built form is inherently incompatible with heritage values. Such a conclusion is at odds with the evidence of successful intensive inner city development in international cities alongside heritage 	Delete rule 15.11.2.11 in its entirety.

			<p>features of considerably greater significance. Vibrant central cities (as sought by objectives in chapters 3 and 15) inherently feature heritage items alongside substantial modern buildings, and to rely on heritage features as a basis for limiting built form and height is narrow-minded, conservative and myopic.</p> <ul style="list-style-type: none"> • The heritage interfaces (and associated provisions) are generally opposed for the reasons stated in the covering submission. Among other things, it is noted that the heritage provisions in subchapter 9.3 provide for the management of buildings within heritage settings or alterations to heritage items. Accordingly, there is no need to separately constrain building height alongside or within heritage settings. • The height limits fail to adequately account for planned development currently progressing in parts of the City Centre Zone where lower heights are proposed. This includes the Catholic Cathedral Precinct (which includes the sites with road boundaries on the north side of Armagh Street at 129, 131, 133, 137 and 143 Armagh Street) and the Cathedral Square Height Precinct, where significant development proposals 	
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			<p>currently being planned entail buildings of a greater height than the proposed rules permit.</p> <ul style="list-style-type: none"> The design of tall buildings is otherwise managed by way of the control/discretion afforded by the urban design rule (C1 and RD1). <p>Accounting for the points above and given that the proposed constraints on building heights are not necessary or appropriate for the purposes of promoting intensification, they should be deleted, such that no maximum height limit applies throughout the City Centre Zone.</p>	
9.	<p>Rule 15.11.2.12</p> <p>(CCZ – road wall height)</p>	Oppose	<p>Retaining a maximum road wall height rule is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.</p> <p>Road wall heights should be unconstrained and provided for as a permitted activity noting the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1).</p>	Delete Rule 15.11.2.12 in its entirety.
10.	<p>Rule 15.11.2.14</p> <p>(CCZ – building)</p>	Oppose	<p>Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of</p>	Delete Rule 15.11.2.14 in its entirety.

	tower setbacks)		<p>PC14 and accordingly this rule should be deleted.</p> <p>To the extent that such matters warrant consideration through a consenting framework, the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1) is considered sufficient to address this matter.</p>	
11.	<p>Rule 15.11.2.15</p> <p>(CCZ – max tower dimension and upper floor site coverage)</p>	Oppose	<p>Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.</p> <p>To the extent that such matters warrant consideration through a consenting framework, the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1) is considered sufficient to address this matter.</p>	Delete Rule 15.11.2.15 in its entirety.
12.	<p>Rule 15.11.2.16</p> <p>(CCZ – building tower separation)</p>	Oppose	<p>Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.</p>	Delete Rule 15.11.2.16 in its entirety.

			To the extent that such matters warrant consideration through a consenting framework, the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1) is considered sufficient to address this matter.	
13.	Rule 15.11.2.17 (CCZ – Wind)	Oppose	<p>Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.</p> <p>As set out in other submission points, controls on wind generation are opposed due to the difficulties of evaluating such effects with certainty and the practical limitations on obtaining such assessments. Moreover, changes to wind generation and the pedestrian environment are a necessary tradeoff contemplated by the NPS-UD, insofar as it directs maximum intensification of central city environments.</p> <p>The proposed rule is otherwise unnecessary and inappropriate for the purposes of promoting intensification and should be deleted.</p>	Delete Rule 15.11.2.17 in its entirety.
Chapter 15 – Commercial Central City Mixed Use Zone Provisions:				

1.	Rule 15.12.1.1 P16 (CCMUZ residential activity)	Oppose	<p>The proposed amendments introduce additional design standards (re: street setback, glazing and outlook space requirements).</p> <p>Such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	Retain the status quo in respect of Rule 15.12.1.1 P16.
2.	Rule 15.12.1.2 C1 (CCMUZ - Catholic Cathedral)	Support, with amendment	<p>Amend the rule to include reference to both the Barbadoes Street Site and the Manchester Street Site, noting that part of the Barbadoes Street Site is already included in this Rule.</p> <p>The rule enables flexibility of the built form, appropriate for the potential redevelopment of one of these sites to establish a new Catholic Cathedral.</p>	Amend Rule 15.12.1.2 C1 to include the whole of the Barbadoes Street Site, and the Manchester Street Site.
3.	Rule 15.12.1.3 RD2 (CCMUZ-RDA consent requirement)	Oppose	The changes proposed to this rule are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.	Retain the status quo in respect of Rule 15.12.1.3 RD5.

			Accordingly, these amendments should be deleted.	
4.	Rule 15.12.1.3 RD4 (CCMUZ- RDA consent requirement)	Oppose	This new rule and its requirement for consent for residential developments within the CCMUZ is not necessary or appropriate for the purposes of promoting intensification and will impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty. Accordingly, these amendments should be deleted.	Delete.
5.	Rule 15.12.1.3 RD5 (CCMUZ- RDA consent requirement)	Oppose	This new rule and its requirement for consent for buildings exceeding 17m height within the CCMUZ is not necessary or appropriate for the purposes of promoting intensification and will impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty. Accordingly, these amendments should be deleted.	Delete.
6.	Rule 15.12.1.3 RD6 (CCMUZ- RDA consent requirement)	Oppose	This new rule and its requirement for consent is not necessary or appropriate for the purposes of promoting intensification and will impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.	Delete.

			Accordingly, these amendments should be deleted.	
7.	Advice note (at the end of 15.12.1.3)	Oppose	The advice note concerns residential heritage areas. For reasons stated in submissions specifically on residential heritage areas, this advice note is opposed.	Delete.
8.	Rule 15.12.2.1 (CCMUZ – Landscaping & trees)	Oppose in part	Proposed clause (a)(iv) increases landscaping requirements from 5% of the site area to 10%. This change is not necessary or appropriate for the purposes of promoting intensification and will in fact be counter to intensification by diminishing the area of the site available for built form/development. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty. Accordingly, this amendment should be deleted.	Retain the status quo in clause (a)(iv) – i.e. 5% rather than 10% site landscaping.
9.	Rule 15.12.2.2 (CCMUZ – building height)	Oppose	The variable building heights and maximum building base heights are inadequate and inappropriate for a commercial zone within the central city, accounting for Policy 3(a) and Policy 3 (c) of the NPS-UD directs that development of up to six stories is to be 'enabled' as a minimum.	Amend as follows: 15.12.2.2 Maximum building height <i><u>a. The maximum height of any building shall be 32 metres.</u></i> <i><u>b. The maximum height of any building shall be in accordance with the height specified Unless identified on the Central City Maximum Building Height</u></i>

			Accounting for this, the submitter seeks that the rule provide for a permitted maximum building height of at least 32m.	<p>planning map the maximum height of any building shall be 32 metres.</p> <p>b. The maximum height of any building base shall be 17 metres.</p> <p>b. Any application arising from this rule shall not be limited or publicly notified</p>
10.	<p>Rule 15.12.2.9</p> <p>(CCMUZ – Minimum number of floors)</p>	Oppose	<p>A prescriptive requirement for a minimum number of floors is opposed on the basis that this is not 'enabling' of development or responsive to the functional or operational needs of activities and commercial/market imperatives determining their optimal location.</p> <p>Accordingly, the proposed new rule requirement for a minimum of 3 floors is opposed.</p> <p>This change is not necessary or appropriate for the purposes of enabling intensification and will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Delete Rule 15.12.2.9 in its entirety.
11.	<p>Rule 15.12.2.10</p>	Oppose	<p>Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the</p>	Delete Rule 15.12.2.10 in its entirety.

	(CCMUZ – building setbacks)		realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	
12.	Rule 15.12.2.11 (CCMUZ – building tower coverage)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	Delete Rule 15.12.2.11 in its entirety.
13.	Rule 15.12.2.12 (CCMUZ – glazing)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	Delete Rule 15.12.2.12 in its entirety.
Chapter 15 – Commercial Central City (South Frame) Mixed Use Zone Provisions:				
1.	Rule 15.13.1.1 P3 (CC(SF)MUZ commercial services & offices)	Support in part	Given the central location of that part of this zone which is outside the Health and Innovation Precincts and that intensification of such land is likely to be realised by way of office development, the limitations in clause (a)(ii) of this rule limiting the total quantum of office activity are considered	Delete activity standard (a) from Rule 15.13.1.1 P3, as follows: <i>a. Outside the Health Precinct and/or the Innovation Precinct:</i> <i>i. Where office activities or commercial services are proposed on a site, individual tenancies shall not exceed 450m² of GLFA; and</i>

			<p>inappropriate and counter to the purpose of PC14.</p> <p>Retention of clause (a)(i) of the rule would ensure that any demand for large floor plate offices or larger office tenants is satisfied within the CCB zone.</p> <p>Enabling smaller office tenancies to establish within the CC(SF)MUZ would support, and not otherwise compromise, the intended role of the CCB zone.</p> <p>Noting the above, clause (a)(ii) of this rule should be deleted.</p>	<p>ii. The total area used for office activities and/or commercial services shall not exceed 450m² of GLFA per site, or 450m² of GLFA per 500m² of land area; whichever is greater. This limit may be exceeded where office activities and/or commercial services form part of a mixed-use development comprising residential activities, in which case the office activities and commercial services collectively shall not exceed 50% of the GLFA of the overall development.</p>
2.	<p>Rule 15.13.1.1 P13</p> <p>(CC(SF)MUZ residential activity)</p>	Oppose	<p>The proposed amendments now require 20m² (rather than 10m²) of outdoor living space for residential units with a ground floor habitable space and otherwise introduce additional design standards (re: glazing and outlook space requirements).</p> <p>Such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	<p>Retain the status quo in respect of Rule 15.13.1.1 P13.</p>

3.	Rule 15.13.1.3 RD5 (CCMUZ-RDA consent requirement)	Oppose	<p>For the reasons set out below in respect of the corresponding built form standards that are proposed, the amendments to rule RD2 are also opposed, noting these specify a requirement for consent for a breach of the following new rules:</p> <ul style="list-style-type: none"> A. Maximum building height B. Minimum number of floors C. Upper floor setbacks, tower dimension and site coverage D. Glazing <p>As stated below, such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	Delete proposed new clauses (j)-(m) in Rule 15.13.1.3 RD5.
4.	Rule 15.13.2.1 (CC(SF)MUZ – height)	Oppose	<p>The variable building heights and maximum building base heights are inadequate and inappropriate for a commercial zone within the central city, accounting for Policy 3(a) and Policy 3 (c) of the NPS-UD directs that development of up to six stories is to be 'enabled' as a minimum.</p>	<p>Delete rule 15.13.2.1 as proposed and replace with the following:</p> <p><i>15.13.2.1 Building height</i></p> <p><i><u>a. The maximum height of any building shall be 32 metres.</u></i></p>

			Accounting for this, the submitter seeks that the rule provide for a permitted maximum building height of at least 32m.	<i><u>b. Any application arising from this rule shall not be limited or publicly notified.</u></i>
5.	Rule 15.13.2.8 (CC(SF)MUZ – minimum number of floors)	Oppose	<p>The requirement for a minimum of 3, rather than 2 floors does not reflect the functional or operational requirements of many permitted activities that are expected to establish with the zone.</p> <p>This change is not otherwise necessary or appropriate for the purposes of promoting intensification and will in fact be counter to intensification by limiting more efficient forms of development based on a 3m ground floor height. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Retain the status quo in respect of Rule 15.13.2.10.
6.	Rule 15.13.2.10 (CC(SF)MUZ – building tower setbacks)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	Delete Rule 15.12.2.10 in its entirety.
7.	Rule 15.13.2.11	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may	Delete Rule 15.12.2.11 in its entirety.

	(CC(SF)MUZ – building tower site coverage)		not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	
8.	Rule 15.13.2.12 (CC(SF)MUZ – glazing)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	Delete Rule 15.12.2.12 in its entirety.
Chapter 15 – Commercial Zones- Matters of Discretion				
1.	Rule 15.14.3.1 (Matters of discretion- building height)	Oppose	<p>The proposed new matters of discretion in clause (b) for applications exceeding the permitted maximum building height are:</p> <ul style="list-style-type: none"> a. Unnecessary, insofar that they introduce matters that are otherwise within the scope of the operative matters . b. Unclear and uncertain. c. Excessively broad in scope. <p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or appropriate for the purposes of promoting</p>	Retain the status quo in respect of Rule 15.14.3.1 (and delete the proposed assessment matters in clause (b) in their entirety).

			<p>intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	
2.	<p>Rule 15.14.3.35</p> <p>(Matters of discretion- upper floor setbacks, tower dimension and coverage)</p>	Oppose	<p>The proposed new matters of discretion relate to rules that are otherwise opposed, and as such these should be deleted.</p> <p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or appropriate for the purposes of promoting intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Delete Rule 15.14.3.35 in its entirety.
3.	<p>Rule 15.14.3.36</p> <p>(Matters of discretion- Tower Roof Modulation)</p>	Oppose	<p>The proposed new matters of discretion in this rule are unnecessary, insofar that they introduce matters that are otherwise within the scope of the operative matters in Rule 15.14.3.1 clause (a).</p> <p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or appropriate for the purposes of promoting intensification. The rule change will also</p>	Delete Rule 15.14.3.36 in its entirety.


			<p>impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	
4.	<p>Rule 15.14.3.37</p> <p>(Matters of discretion- Glazing)</p>	Oppose	<p>The proposed new matters of discretion relate to rules that are otherwise opposed, and as such these should be deleted.</p> <p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or appropriate for the purposes of promoting intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Delete Rule 15.14.3.37 in its entirety.
5.	<p>Rule 15.14.3.38</p> <p>(Matters of discretion- outlook space)</p>	Oppose	<p>These changes are not necessary or appropriate for the purposes of promoting intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Delete Rule 15.14.3.38 in its entirety.


6.	Rule 15.14.3.39 (Matters of discretion-Wind	Oppose	<p>The proposed new matters of discretion relate to rules that are otherwise opposed, and as such these should be deleted.</p> <p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or appropriate for the purposes of promoting intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Delete Rule 15.14.3.39 in its entirety.
7.	Rule 15.14.5.2 (Matters of discretion-Buildings at 136 Barbadoes Street)	Support in part	Amend rule title as necessary given the above submission point.	Retain as notified, noting some consequential amendments might be required to the rule title given other submission points sought.
8.	Chapter 15 City Centre Zone Controlled Activities	Oppose in part	As the Armagh Street Site is a potential site for a new Catholic cathedral, flexibility is sought on this site similar to Rule 15.12.1.2 C1 in the CCMUZ.	Insert an equivalent Rule 15.12.1.2 C1 in the City Centre Zone, for the Armagh Street Site.


9.	Chapter 15 City Centre Zone Matters of Control	Oppose in part	As the Armagh Street Site is a potential site for a new Catholic Diocese cathedral, flexibility is sought on this site similar to Rule 15.14.5.2 in the CCMUZ.	Insert an equivalent section 15.14.5.2 in the City Centre Zone, for buildings at the Armagh Street Site.
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No.	Provision	Position	Submission	Relief Sought
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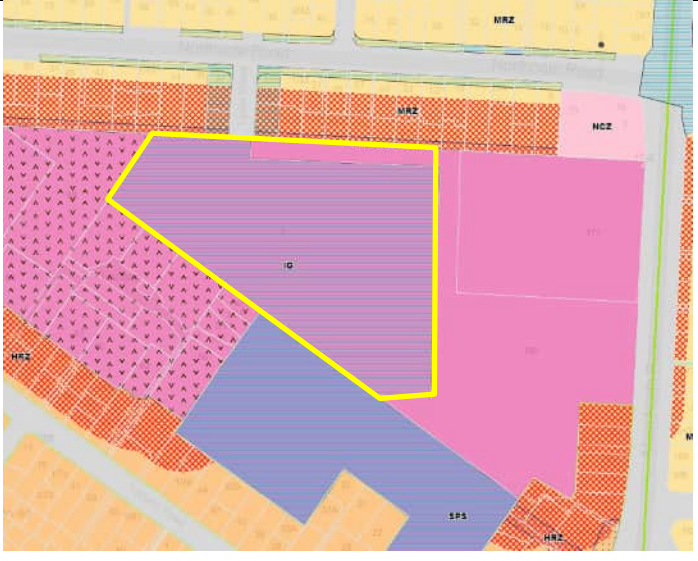
Planning Maps / Rezoning

1.	Planning maps	Support	<p>The zoning of the land at 136 Barbadoes Street is supported.</p> <p>However, given PC13 proposes to remove the heritage listing for the Cathedral, it is no longer appropriate for any of the planning maps to show a heritage item on the site. The Diocese therefore seek that the heritage listing shown at 136 Barbadoes Street is removed from the electronic planning map.</p>	<p>Retain the SPS and CCMUZ zoning of the land at 136 Barbadoes Street (identified below), but delete the heritage listing/outline from the planning maps.</p> 
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No.	Provision	Position	Submission	Relief Sought
2.	Planning maps	Support	The zoning of the land at 373-375 Manchester Street is supported.	<p>Retain the SPS zoning of the land at 373-375 Manchester Street (identified below.</p> 
3.	Planning maps	Support in part	<p>For the reasons expressed in the submission above, the submitter supports the zoning of the land bounded by Oxford Terrace, Manchester Street, Armagh Street, and Colombo Street, but opposes a number of overlays applying to the land or adjacent land.</p> <p>Specifically, the submitter:</p> <ol style="list-style-type: none"> a. Opposes the extent of the heritage setting for New Regent Street (being 	<p>Amend the planning maps applying to the land bounded by Oxford Terrace, Manchester Street, Armagh Street, and Colombo Street, as follows::</p> <ol style="list-style-type: none"> a. Delete the extent of the heritage setting for New Regent Street (being heritage setting 336 associated with heritage item 404 in Appendix 9.3.7.2 schedule), so that it ends at the southern most edge of Armagh Street, being where New Regent Street meets Armagh Street.

No.	Provision	Position	Submission	Relief Sought
			<p>heritage setting 336 associated with heritage item 404 in Appendix 9.3.7.2 schedule) and considers the setting should end at the southern most edge of Armagh Street, being where New Regent Street meets Armagh Street.</p> <p>b. Opposes the Central City Heritage Interface overlay, where this applies to the to the site.</p>	<p>b. Delete the Central City Heritage Interface overlay.</p> 
4.	Planning maps	Support in part	<p>The Diocese has interests in land adjoining Our Lady of the Assumption school in Sparks Road, Hoon Hay. That school is subject to SPS zoning, but the adjacent land is zoned MRZ which limits the scope to establish school-related activity over these sites. Accounting for this, the Diocese seeks SPS zoning of the land.</p>	<p>Amend the planning maps by rezoning the land identified below as SPS (with a consequential change to Appendix 13.6.6.2 made, to identify an underlying zoning of MRZ):</p>

No.	Provision	Position	Submission	Relief Sought
				
5.	Planning maps	Support in part	<p>The Diocese has interests in land in and adjoining Lydia Street, Redwood. The majority of this land is being developed for the new Marian School campus, in accordance with a designation that applies to the land.</p> <p>However, the land remains subject to an IG zone under PC14, with this zoning reflecting the former use of the land. Due to the IG zoning, an Industrial Interface qualifying matter applies to the adjacent residential land on Lydia Street and Northcote Road.</p> <p>The Diocese consider that a Brownfield Precinct overlay should be applied to the land to recognise the attributes of the land</p>	<p>Amend the planning maps to identify a Brownfield Precinct overlay, over the IG zoned school site; and delete the Industrial Interface overlay for those properties with frontage to Northcote Road or Lydia Street.</p>

No.	Provision	Position	Submission	Relief Sought
			<p>and that any use of surplus school land may be appropriate for residential development.</p> <p>The Diocese also questions the appropriateness of the Industrial Interface overlay applying to those sites along Lydia Street and Northcote Road, given that they will be adjoining a school and supermarket (both under development) rather than industrial activities which the interface overlay is intended to address.</p>	

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 16/05/2023

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Organisation: Carter Group Limited

On behalf of:

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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:

Attached Documents

File

PC13 Submission - Carter Group Limited 3443-8088-7587

Form 5

**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR
PLAN, CHANGE OR VARIATION**

Clause 6 of Schedule 1, Resource Management Act 1991

To Christchurch City Council

Name of submitter: Carter Group Property Limited (*Carter Group*)

- 1 This is a submission on the proposed Heritage Plan Change 13 (*PC13*) to the Christchurch District Plan (the *District Plan*).
- 2 Carter Group could not gain an advantage in trade competition through this submission.
- 3 Carter Group's submission relates to the whole of PC13. The specific relief sought by Carter Group is set out at **Appendix 1** and elaborated on below.
- 4 Carter Group wishes to be heard in support of the submission.
- 5 If others make a similar submission, Carter Group will consider presenting a joint case with them at a hearing.

STRATEGIC OBJECTIVES

- 6 Carter Group generally opposes PC13 to the extent that it is inconsistent with Strategic Objectives 3.3.1 and 3.3.2 of the District Plan. Carter Group seek that the provisions of PC13 are made consistent with those Strategic Objectives.

CARTER GROUP SITES WITH HERITAGE INTERESTS

- 7 Carter Group owns land at 32 Armagh Street, known as the former Girls High Site (the *Site*). That land is partly covered by a heritage setting (heritage setting number 287) and includes a heritage item (the 'Blue Cottage' – heritage item number 390). The extent of the Site, and the heritage setting and item are shown below:



Figure 1: Site shown in yellow, approximate location of heritage setting shown in orange, and item location indicated by a red cross.

- 8 The District Plan statement of significance for the building notes, among other things, its historical significance as a c.1875 colonial cottage and its architectural significance due to the 'authenticity of its exterior and retention of some of its original interior detailing'. However, the building is in a poor state of repair with evident damage to its exterior and, as noted in the statement of significance, has had original architectural features removed over time. The heritage setting for the building is of no apparent significance in its own right – constituting a gravelled car park.
- 9 Accounting for these attributes, the building and setting are considered to be of little to no heritage value.
- 10 The scope of PC13 is broad and presents a timely opportunity to review the extent of the schedule of heritage items. Such a review is especially relevant in instances where additional information on individual items has become available following the

District Plan Review. The provision of such information is integral to the need to carefully weigh costs and benefits of any proposed regulation (such as scheduling) under s 32 RMA.

11 For the reasons described above, the Blue Cottage's heritage status is considerably diminished and can no longer be considered significant. This building and its setting should no longer be included on the Schedule.

12 Carter Group therefore seeks that:

12.1 The Blue Cottage (Heritage Item 390) be removed from the Schedule of Significant Historic Heritage in Appendix 9.3.7.2 of the District Plan; and

12.2 Associated Heritage Setting 287 be removed from the same.

The proposed residential heritage areas

13 PC13 introduces 11 new heritage areas into the District Plan, with associated objectives, policies and rules.

14 Carter Group hold significant concerns over the introduction of these heritage areas in general. The Site is located in the "Inner City West HA6" residential heritage area. As is clear from the figure above, the majority of the Site (and we would argue a large proportion of the heritage area itself) holds no heritage values whatsoever. It is therefore perplexing why these areas have been identified in this new overlay.

15 Carter Group further note that the Heritage Report and Site Record Forms for 'HA6 Inner City West' prepared by Dr Ann McEwan (Appendix 12 to the section 32 report) records the 32 Armagh Street as a vacant lot with its contribution to the heritage area being 'intrusive'. The Blue Cottage is recorded as being located on 325 Montreal Street with its contribution to the heritage area being 'defining'. However, the proposed contributions map (proposed Appendix 9.3.7.8) identifies the whole site, including the vacant lot on 32 Armagh Street, as having a 'defining' contribution. This is wrong and inconsistent with the report prepared by Dr Ann McEwan.

16 Carter Group also question the identified contribution of other sites within the "Inner City West HA6" residential heritage area, as the basis for then justifying the identification of a residential heritage area. By way of example, the YMCA Christchurch site occupies a substantial area and is assessed as making a 'defining' contribution to the proposed "Inner City West HA6" residential heritage area, despite featuring modern and partially-constructed multi-level commercial buildings of no apparent heritage merit. Other sites within the heritage area are also of questionable merit in terms of their contribution.

- 17 Carter Group are concerned about these errors, and the risk that errors such as these might be systemic throughout PC13. Given the strict regulations on development PC13 proposes, it is essential to ensure the provisions are accurate and justified. The heritage listings and corresponding rules within the District Plan currently recognise and provide for the protection of historic heritage from inappropriate subdivision, use and development.
- 18 A number of the proposed heritage areas overlap with character areas already identified in the District Plan. It is not entirely clear why both of these overlays are required to protect historic heritage. The addition of a residential heritage area overlay will add unnecessary complexity and duplication in the interpretation of the District Plan.
- 19 Carter Group note that through the hearings on the proposed Christchurch District Plan, the Independent Hearings Panel determined that there was no basis to retain rules controlling development on sites adjacent to heritage items or settings in order to satisfy section 6(f) of the RMA. For the same reasons, it follows that the proposed provisions for Residential Heritage Areas, and the related 'Interface Sites' is not warranted.
- 20 The Site's identification within a heritage area is strongly opposed by the Carter Group, who seek that:
- 20.1 the heritage areas in general (maps and associated provisions) are removed from PC13; or
 - 20.2 the proposed "Inner City West HA6" residential heritage area is removed from PC13; or
 - 20.3 at the very least, the Site be removed from the proposed "Inner City West HA6" residential heritage area.

The New Regent Street heritage setting

- 21 Carter Group oppose the extent of the heritage setting for New Regent Street (being heritage setting 336 associated with heritage item 404 in Appendix 9.3.7.2 schedule).
- 22 Carter Group oppose the identification of this heritage setting to the northern most edge of Armagh Street and consider the setting should end at the southern most edge of Armagh Street, being where New Regent Street meets Armagh Street. Among other reasons, Carter Group consider that the modern buildings fronting Armagh Street at either end of New Regent Street or the Armagh Street road reserve have no apparent heritage values that warrant a heritage setting.

23 There is no basis for why this heritage setting extends as far as it does.

Central City Heritage Interface

24 Carter Group have interests in the land bounded by Oxford Terrace, Manchester Street, Armagh Street, and Colombo Street as shown below:



Figure 2: Approximate outline of site in yellow

25 Part of this site is subject to the proposed 'Central City Heritage Interface' overlay. This overlay is strongly opposed by the Carter Group. Carter Group considers there is no basis or justification for such an overlay over the Site. Among other reasons, Carter Group notes that the site has no identified heritage values and is surrounded by roads, that provide an adequate interface to and separation from other sites in the area, including those which may have heritage value.

26 It is also unclear why there are no objectives or policies introduced by PC13 in respect of these heritage interface sites. This gives very little direction to plan users as to their utility and/or relevance.

27 On this basis, Carter Group therefore seek:

27.1 the heritage interface overlays in general (maps and any associated provisions) are removed from PC13; or

27.2 the Central City Heritage Interface relating to New Regent Street is removed;
or

27.3 at the very least, the Central City Heritage Interface is removed from the
above site.

Signed for and on behalf of Carter Group Limited by its solicitors and authorised agents
Chapman Tripp



Jo Appleyard
Partner
12 May 2023

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APPENDIX 1

No.	Provision	Position	Submission	Relief Sought
1	Definition of 'Alteration'	Oppose	The definition has the effect of meaning that any change, modification or addition to a heritage item, heritage setting or heritage fabric, or a building in a heritage area will constitute an 'alteration' and trigger corresponding rules and consent requirements, irrespective of whether it impacts on heritage fabric. This will create unnecessary, costly and inefficient consent requirements, and provide no benefits in respective of heritage.	Retain status quo.
2	Definition of 'Contributory building'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Regardless, the proposed definition is vague and provides little certainty as to whether buildings would or would not constitute a contributory building.	Delete.
3	Definition of 'Defining building'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Regardless, the proposed definition is vague and provides little certainty as to whether buildings would or would not constitute a defining building.	Delete.

No.	Provision	Position	Submission	Relief Sought
4	Definition of 'Demolition'	Oppose	The amended definition has the effect of meaning that any destruction of a non-substantial part of a building constitutes 'demolition' and triggers corresponding rules and consent requirements. This will create unnecessary, costly and inefficient consent requirements for inconsequential partial demolition work, create conflict with the definition of 'alteration', and provide no benefits in respect of heritage.	Retain status quo.
5	Definition of 'Heritage setting'	Oppose	The amended definition removes the wording that a setting <i>'together with the associated heritage item, has met the significance threshold'</i> and instead states that <i>'Heritage settings have not been assessed as meeting the significance threshold for scheduling'</i> . The submitter considers that heritage settings that do not meet the significance threshold for scheduling should not be listed, with associated regulatory requirements.	Retain status quo.
6	Definition of 'Heritage Building Code works'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for insulation and glazing upgrades.	Retain as proposed.
7	Definition of 'Intrusive building or site'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.	Delete.

No.	Provision	Position	Submission	Relief Sought
			Regardless, the proposed definition is vague and provides little certainty as to whether buildings or sites would or would not be intrusive.	
8	Definition of 'Neutral building or site'	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.</p> <p>Regardless, the proposed definition is vague and provides little certainty as to whether buildings or sites would or would not be categorised as neutral.</p>	Delete.
9	Definition of 'Reconstruction'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for additional forms of reconstruction.	Retain as proposed.
10	Definition of 'Relocation'	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. As such, the submitter opposes the definition of relocation insofar that it relates to heritage areas.</p> <p>Further, the submitter opposes the deletion of the exclusions in (a) and (b) that otherwise sensibly exclude temporary relocation or realignment works.</p>	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
11	Definition of 'Repairs'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for additional forms of repairs.	Retain as proposed.
12	Definition of 'Restoration'	Supports	The amended definition provides greater clarity and certainty.	Retain as proposed.
13	8.6.1 Minimum net site area	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Further, the proposed 450m ² minimum net site area is opposed on the basis that it conflicts with the objectives in the NPS-UD and District Plan to provide for the most intensive and efficient scale and form of development within Central City areas.	Delete.
14	8.9 Rules-Earthworks	Support	The amended provisions in rule 8.9 are generally appropriate.	Retain as proposed.
15	Policy 9.3.2.2.2 Identification, assessment and scheduling of heritage areas	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.	Delete.

No.	Provision	Position	Submission	Relief Sought
16	Policy 9.3.2.2.3 - Management of scheduled historic heritage	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.</p> <p>The amendments to clause (b) of this policy are also opposed. The operative wording within this policy sensibly recognises that Significant (Group 2) heritage items are potentially capable of accommodating a greater degree of change than Highly Significant (Group 1) heritage items.</p>	Retain status quo.
17	Policy 9.3.2.2.5 Ongoing use of scheduled historic heritage	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to this policy are opposed.	Retain status quo.
18	Policy 9.3.2.2.8- Demolition of scheduled historic heritage	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to clause (a) of this policy are opposed.</p> <p>In addition, the changes to clause (a)(ii) are opposed insofar that they introduce a new 'test' for evaluating the demolition of historic heritage that presents an unreasonable and inappropriate threshold that materially changes and undermines the policy. By way of example, the proposed wording may preclude the demolition of heritage items that are</p>	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
			significantly (physically) compromised, on the basis of one or more (non-physical) heritage values (e.g. historical/social or cultural/spiritual value) remaining.	
19	Rule 9.3.3 How to interpret and apply the rules	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to this rule, insofar that they relate to heritage areas are opposed.	Delete all references to heritage areas.
20	9.3.4 Rules- Historic heritage	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, changes to this rule, insofar as they relate to heritage areas are opposed.	Delete all references to heritage areas within rule 9.3.4, including (and in particular) rules RD6-RD8.
21	Matters of discretion 9.3.6.1(a)	Oppose	The submitter opposes the deletion of clause (a), given that damage incurred as a result of the Canterbury earthquakes of 2010 and 2011 including the costs of repair and reconstruction, remains a relevant matter for consideration.	Retain status quo for 9.3.6.1(a).
22	Matters of discretion 9.3.6.1(p)	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters under clause (p) are opposed.	Delete proposed 9.3.6.1(p).

No.	Provision	Position	Submission	Relief Sought
23	Matters of discretion 9.3.6.4	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters in rule 9.3.6.4 are opposed.	Delete proposed rule 9.3.6.4.
24	Matters of discretion 9.3.6.5	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters in rule 9.3.6.5 are opposed.	Delete proposed rule 9.3.6.5.
25	Matters of discretion 9.3.6.6	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters in rule 9.3.6.6 are opposed.	Delete proposed rule 9.3.6.6.
26	Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items	Oppose	For the reasons stated in the covering submission, the listing of the item and setting at 32 Armagh Street (and 325 Montreal Street) is inappropriate. Accordingly, this listing should be deleted.	Delete Heritage Item 390 and Heritage Setting 287 regarding 32 Armagh Street from Appendix 9.3.7.2.
27	Appendix 9.3.7.3	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
	Schedule of Significant Historic Heritage Areas		covering submission. Accordingly, the changes to this schedule are opposed.	
28	Appendix 9.3.7.4 Heritage item and heritage setting exemptions	Oppose	The exemptions provided in Appendix 9.3.7.4 are an important tool for incentivising the adaptive reuse and ongoing protection of heritage items. As such, the amendments proposed to this appendix which reduce the extent of exemptions is inconsistent with the Plan's objectives in relation to heritage and section 6 of the Act.	Retain the status quo.
29	Appendix 9.3.7.7 – Residential Heritage Areas - Aerial Maps	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Appendix 9.3.7.7 should be deleted.	Delete.
30	Appendix 9.3.7.8 – Residential Heritage Areas – Site Contributions Maps	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Appendix 9.3.7.8 should be deleted.	Delete.
31	Appendix 9.3.7.9 – Residential	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the	Delete.

No.	Provision	Position	Submission	Relief Sought
	Heritage Areas – Interface Sites and Character Area Overlay Maps		covering submission. Accordingly, Appendix 9.3.7.9 should be deleted.	
32	Rule 14.5.3.1.3 Area-specific restricted discretionary activities	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 14.5.3.1.3 should be deleted.	Delete.
33	Rule 14.5.3.2 Area-specific built form standards	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 14.5.3.2 should be deleted.	Delete.
34	Rule 15.11.1.3 Restricted discretionary activities	Oppose	<p>It is assumed that the reference to the “Central City Heritage Qualifying Matter and Precinct” is a reference to the ‘Central City Heritage Interface’ overlay shown on the planning maps, although this is not clear.</p> <p>The heritage interfaces (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 15.11.1.3 should be deleted.</p>	Delete.

No.	Provision	Position	Submission	Relief Sought
35	Rule 15.11.2.11 Building Height	Oppose	<p>It is assumed that the reference to the "Central City Heritage Qualifying Matter and Precinct" is a reference to the 'Central City Heritage Interface' overlay shown on the planning maps, although this is not clear.</p> <p>The heritage interfaces (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 15.11.2.11 should be deleted.</p>	Delete

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Jo **Last name:** Appleyard

Organisation: Church Property Trustess

On behalf of:

Preferred method of contact Email

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Suburb:

City:

Country: New Zealand

Postcode: 8140

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Daytime Phone:

I could not

Gain an advantage in trade competition through this submission

I am not

directly affected by an effect of the subject matter of the submission that :

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

PC14 Submission - Church Property Trustees 3457-4784-5667

**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR
PLAN, CHANGE OR VARIATION**

Clause 6 of Schedule 1, Resource Management Act 1991

To Christchurch City Council

Name of submitter: Church Property Trustees (CPT)

- 1 This is a submission on the proposed Plan Change 14 (PC14) to the Christchurch District Plan (the *District Plan*).
- 2 CPT could not gain an advantage in trade competition through this submission.
- 3 CPT's submission relates to the whole of PC14. The specific relief sought by CPT is set out at **Appendix 1** and elaborated on below.
- 4 CPT wishes to be heard in support of the submission.
- 5 If others make a similar submission, CPT will consider presenting a joint case with them at a hearing.

The St James Church

- 6 CPT owns land at 65 Riccarton Road (the *Site*), this is held on behalf of the Anglican Diocese of Christchurch (the *Diocese*). The Site houses the St James Church (the *Church*). The Church is listed as a 'Highly Significant' heritage item (heritage item number 465), within a heritage setting (heritage setting number 220) in the District Plan:

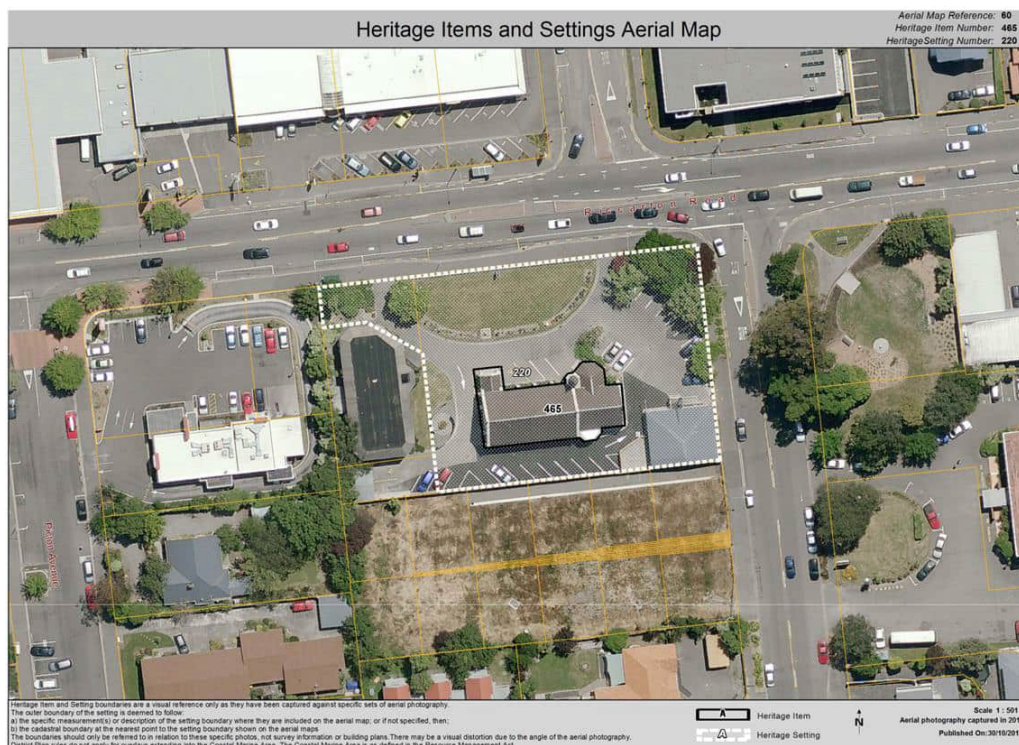


Figure 1: The heritage item and setting on the Site, Heritage Items and Settings Aerial Map, Appendix 9.3.7.7 Christchurch District Plan.

- 7 The Church was badly damaged during the Canterbury earthquakes and was listed as an Earthquake Prone Building having an NBS of less than 20% on 27 May 2019. The Church is currently in an extremely poor state of repair, and lacks the structural integrity required for its safe usage.
- 8 The Diocese continues to respond to changing demographics in the way it operates and the infrastructure required. In Christchurch this has included re-focussing the centres of operation for some parishes as a critical aspect of its core activities.
- 9 Notably, the Riccarton parish merged with the Spreydon parish a number of years ago. The Diocese therefore has no use for the Church, the Site itself is redundant and surplus to the Diocese's uses.
- 10 CPT hold a wide range of heritage assets throughout the City on behalf of the Diocese. It is one of the largest (if not the largest) private heritage owners in the South Island. Almost all of its heritage assets have been restored to better than pre-earthquake levels.
- 11 CPT have investigated in depth the feasibility of reinstating the Church, however, none of the options are economically viable for the Diocese. The Diocese has also investigated the sale of the Site to developers who might otherwise wish to reinstate the Church themselves. CPT's resounding feedback from these market enquiries was that purchasers were reluctant to take on the risk of an extremely low NBS building, and the uncertainty around future use and potential cost of repair.
- 12 CPT consider that the Church would be appropriate to demolish, having regard to the matters listed in Policy 9.3.2.2.8 which provides (as amended by PC14):

9.3.2.2.8 Policy – Demolition of scheduled historic heritage of heritage items

a. When considering the appropriateness of the demolition of a heritage item scheduled in Appendix 9.3.7.2 or a defining building or contributory building in a heritage area scheduled in Appendix 9.3.7.3, have regard to the following matters:

i. whether there is a threat to life and/or property for which interim protection measures would not remove that threat;

ii. whether the extent of the work required to retain and/or repair the heritage item or building is of such a scale that the heritage values and integrity of the heritage item or building would be significantly compromised, and the heritage item would no longer meet the criteria for scheduling in Policy 9.3.2.2.1.

iii. whether the costs to retain the heritage item or building (particularly as a result of damage) would be unreasonable;

iv. the ability to retain the overall heritage values and significance of the heritage item or building through a reduced degree of demolition; and

v. the level of significance of the heritage item.

- 13 CPT consider that the Church's heritage status is considerably diminished given its current state of disrepair and it no longer meets the criteria for listing. CPT therefore seeks that:

- 13.1 The Church's heritage item (heritage item number 465) and heritage setting (heritage setting number 220) be removed from the Schedule of Significant Historic Heritage in Appendix 9.3.7.2 of the District Plan.

Signed for and on behalf of Church Property Trustees by its solicitors and authorised agents Chapman Tripp



Jo Appleyard
Partner
12 May 2023

Address for service of submitter:

Church Property Trustees
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PO Box 2510
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Email address: Jo.Appleyard@chapmantripp.com / Lucy.Forrester@chapmantripp.com

APPENDIX 1

No.	Provision	Position	Submission	Relief Sought
1	Definition of 'Alteration'	Oppose	The definition has the effect of meaning that any change, modification or addition to a heritage item, heritage setting or heritage fabric, or a building in a heritage area will constitute an 'alteration' and trigger corresponding rules and consent requirements, irrespective of whether it impacts on heritage fabric. This will create unnecessary, costly and inefficient consent requirements, and provide no benefits in respective of heritage.	Retain status quo.
2	Definition of 'Demolition'	Oppose	The amended definition has the effect of meaning that any destruction of a non-substantial part of a building constitutes 'demolition' and triggers corresponding rules and consent requirements. This will create unnecessary, costly and inefficient consent requirements for inconsequential partial demolition work, create conflict with the definition of 'alteration', and provide no benefits in respective of heritage.	Retain status quo.
3	Definition of 'Heritage setting'	Oppose	The amended definition removes the wording that a setting <i>'together with the associated heritage item, has met the significance threshold'</i> and instead states that <i>'Heritage settings have not been assessed as meeting the significance threshold for scheduling'</i> . The submitter considers that heritage settings that	Retain status quo.

			do not meet the significance threshold for scheduling should not be listed, with associated regulatory requirements.	
4	Policy 9.3.2.2.8- Demolition of scheduled historic heritage	Oppose	The changes to clause (a)(ii) are opposed insofar that they introduce a new 'test' for evaluating the demolition of historic heritage that presents an unreasonable and inappropriate threshold that materially changes and undermines the policy. By way of example, the proposed wording may preclude the demolition of heritage items that are significantly (physically) compromised, on the basis of one or more (non-physical) heritage values (e.g. historical/social or cultural/spiritual value) remaining.	Retain status quo.
5	Matters of discretion 9.3.6.1(a)	Oppose	The submitter opposes the deletion of clause (a), given that damage incurred as a result of the Canterbury earthquakes of 2010 and 2011 including the costs of repair and reconstruction, remains a relevant matter for consideration.	Retain status quo for 9.3.6.1(a).
6	Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items	Oppose	For the reasons stated in the covering submission, the listing of the item and setting at 65 Riccarton Road is inappropriate. Accordingly, this listing should be deleted.	Delete Heritage Item 465 and Heritage Setting 220 regarding 65 Riccarton Road from Appendix 9.3.7.2.
7	Appendix 9.3.7.4	Oppose	The exemptions provided in Appendix 9.3.7.4 are an important tool for incentivising the	Retain the status quo.

	Heritage item and heritage setting exemptions		adaptive reuse and ongoing protection of heritage items. As such, the amendments proposed to this appendix which reduce the extent of exemptions is inconsistent with the Plan's objectives in relation to heritage and section 6 of the Act.	
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Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023
First name: Jo **Last name:** Appleyard
Organisation: LMM Investments 2012 Limited

On behalf of:

Preferred method of contact Email

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Cashel Street

Suburb:

City:

Country: New Zealand

Postcode: 8140

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Daytime Phone:

I could not
 Gain an advantage in trade competition through this submission
 I am not
 directly affected by an effect of the subject matter of the submission that :
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 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.

Attached Documents

File

PC14 Submission - LMM Investments 2012 Ltd 3450-3487-1331

Form 5

**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR
PLAN, CHANGE OR VARIATION**

Clause 6 of Schedule 1, Resource Management Act 1991

To Christchurch City Council

Name of submitter: LMM Investments 2012 Limited (*LMM*)

- 1 This is a submission on the proposed plan change 14 (*PC14*) to the Christchurch District Plan (the *District Plan*).
- 2 LMM could not gain an advantage in trade competition through this submission.
- 3 LMM's submission relates to the whole of PC14.
- 4 LMM wishes to be heard in support of the submission.
- 5 If others make a similar submission, LMM will consider presenting a joint case with them at a hearing.

The Site

- 6 LMM have interests in the Whisper Creek Golf Resort land zoned Specific Purpose (Golf Resort) Zone in the Christchurch District Plan. LMM's intention is to develop the land for residential development, which would include elements of recreation, the naturalisation of waterways, and wetland restoration.
- 7 While not strictly a 'residential zone' (as defined by the National Planning Standards), there is no doubt that the Specific Purpose (Golf Resort) Zone for the land is predominantly 'urban' in nature and provides for some degree of residential activity.
- 8 LMM consider that the site is appropriate for rezoning to Medium Density Residential Zone (*MDRZ*) including an appropriate ODP and associated amendments to the policy and rule framework to give effect to the relief sought.

Tsunami Management Area

- 9 LMM opposes the introduction of the Tsunami Management Area (*TMA*) as notified in PC14 as a qualifying matter and seeks that these provisions be deleted in their entirety.
- 10 Firstly, LMM considers that the TMA as notified is legally wrong, and falls outside of the scope of what is allowed under the RMA to be included in an intensification planning instrument like PC14:
 - 10.1 Section 77I of the RMA only grants Council's the power to impose qualifying matters over 'relevant residential zones'. The TMA has been notified as applying over a whole range of commercial, industrial, open space, and rural zones.

- 10.2 A recent Environment Court¹ case has considered the issue of qualifying matters and found that these must only relate to making the intensified density standards themselves less enabling. It is not a mechanism that enables further constraint to the status quo. Such an amendment to the District Plan would be ultra vires. This is directly relevant to the TMA being proposed as a qualifying matter, which effectively proposes to make a range of status quo provisions less enabling of development (and not just the MDRZ).
- 11 It is also LMM's position that the extent of the overlay is excessive and not appropriately commensurate with risk. The TMA appears to be based off a 2019 report by NIWA (the *NIWA Report*) 1 in 500 year tsunami event with 1.06m² sea level rise by 2120. This modelled scenario is too conservative in light of the serious development restrictions the overlay places on private property.
- 12 LMM are not aware of any other tier 1 local authority using a 1:500 year tsunami risk as a qualifying matter. The modelled scenario is inconsistent with the standard coastal risk approaches throughout the country:

Canterbury Regional Policy Statement

- 12.1 In the Canterbury Regional Policy Statement (*CRPS*) 'high hazard areas' (albeit they do not relate to tsunamis but rather coastal inundation and erosion) at (1) also refers to a 1:500 year event for flooding (being the equivalent of 0.2%AEP) where depths are greater than one metre.
- 12.2 From our review of the NIWA Report, it appears the TMA notified includes all areas where inundation might occur from the tsunami scenario, where that is greater than 0m. In other words, land has been included in the TMA where depth will be far less than one metre in a 1:500 year event. It is difficult to see how the TMA is being justified in these areas.
- 12.3 Given the purpose of the TMA is to mitigate risk to life of people in the event of a tsunami, consideration should have been given to at which point that risk materialises. It is not appropriate to simply take the area from the NIWA report and convert this into an overlay without analysing the appropriateness of its extent any further.

The Greater Christchurch Partnership

- 12.4 The proposed TMA is larger than the Tsunami Inundation area identified by the Greater Christchurch Partnership as part of its consultation on the Greater Christchurch Spatial Plan (the *draft Spatial Plan*). The draft Spatial Plan maps include a map showing the Canterbury Coastal Natural Hazards. It is not clear why the TMA has not been mapped in a manner consistent with this map.

¹ *Waikanae Land Company Limited v Heritage New Zealand Pouhere Taonga* [2023] NZEnvC 56.

² We note that the section 32 report incorrectly records this as being 1.6m at [6.16.2].

The tsunami evacuation area

12.5 The TMA is also similar to the Canterbury Tsunami Evacuation Zones. The commentary to these zones is as follows:

"Tsunami evacuation zones are areas that we recommend people evacuate from as a precaution after they feel a long or strong earthquake, or in an official tsunami advisory or warning. They encompass many different possible tsunami scenarios.

The area that would be flooded in any particular tsunami depends on many factors, including:

- *the size of the earthquake*
- *precisely how the earthquake fault moved*
- *the direction the tsunami is coming from*
- *the tide level when the largest waves arrive.*

Every tsunami will be different and we can never say for sure exactly which areas within a zone will be flooded. There is no one tsunami that would flood an entire zone.

We consider many different tsunami scenario models when drawing the tsunami evacuation zones. The inland boundary of the zones is based on several 'worst-case' scenarios – very rare tsunamis that we might expect once every 2500 years.

[emphasis added]

12.6 Environment Canterbury themselves recognise that:³

"... the tsunami evacuation zones are not appropriate for property-specific land use planning. Land use planning considers the sustainability of development in an area as well as life safety and wellbeing issues, whereas tsunami evacuation zones are fundamentally about life safety. For this reason, as explained above, the zones are generally conservative, and the yellow zone in particular represents an extreme event that we would only expect in the order of every 2500 years, which is beyond most land use planning time frames."

[emphasis added]

12.7 This further demonstrates the inappropriately conservative nature of the TMA.

The NIWA Report

12.8 The NIWA Report on which the TMA is based also recognises that the maps are highly conservative and caveats many of its own findings:

³ Review of tsunami evacuation zones for Christchurch City, Report No. R19/125, prepared by Helen Jack dated November 2019.

"Maps of the inundation extents should not be used at scales finer than 1:25,000. The overview maps are intended as a guide only and should not be used for interpreting inundation."

- 12.9 It is further noted the report was prepared with the intention of informing the Land drainage recovery program, and not specifically for the purposes of being applied as a qualifying matter to restrict development.
- 13 The costs of imposing such strict restrictions on development over such a conservative area significantly outweighs the benefits of reducing the risk of harm to people. Risk and development constraints need to be proportionate and appropriate.
- 14 LMM seeks that the TMA, and related provisions, be deleted in their entirety.
- 15 In the alternative, if the TMA is retained there needs to be:
- 15.1 more focussed site-by-site assessments that reflect site specific considerations and mitigation; and
- 15.2 a clear policy pathway for on-site mitigation.
- Financial contribution policy**
- 16 The proposed tree canopy cover and financial contributions provisions are unworkable and unreasonable.
- 17 The provisions are difficult to understand and create considerable uncertainty. For example:
- 17.1 If trees are retained over and above the 20% cover threshold will a financial credit be provided to the applicant?
- 17.2 It is not clear who would be qualified to undertake the assessment of the canopy cover.
- 17.3 The proposed definitions of PC14 introduce the definition of a 'hedge' with specific reference to the tree canopy cover and financial contributions provisions, yet those provisions do not utilise that term.
- 17.4 If a stormwater basin is heavily planted in native shrubs, should this receive a credit as plants (and not just trees) also provide for carbon sequestration?
- 17.5 How will the timing of assessment work in relation to consenting processes? For greenfield subdivisions for example, landscape plans are often not completed until after resource consent is issued.
- 18 The canopy cover provisions would be difficult to enforce. If canopy cover is determined as acceptable at the time of resource consent and 10 years or 15 years later one or some of those trees are cut down, who monitors and enforces that

requirement? Does Council have the staff resources to maintain that level of monitoring across wide swathes of the city?

- 19 Councils increasingly seek a reduction in reserve areas within greenfield subdivisions, on the basis of ongoing maintenance costs for the Council. It would be very difficult to achieve a 20% of net site area coverage in most greenfield subdivisions, noting that those reserve areas are also required for other purposes such as playground and open grass for play areas, that are incompatible with extensive tree canopy cover.
- 20 The provisions require 20% of the net site area adjacent to road corridors to contain tree cover. Accommodating tree cover typically necessitates wider road corridors. Wider road corridors reduces land available for housing, in direct conflict with the existing District Plan provisions stipulating a minimum density of 15 hh/ha must be achieved for greenfield subdivision areas, and more generally the NPS-UD.
- 21 The cost implications of not achieving tree cover are considerable and, given LMM does not consider the 20% cover is achievable, will add further to development costs that are then passed onto purchasers.
- 22 The implications of this proposed policy are significant from an economic perspective and must be adequately justified by the Council. As it stands, LMM do not consider the Council has done this and therefore the proposed financial contributions policy should be deleted in its entirety.

Signed for and on behalf of LMM Investments 2012 Limited by its solicitors and authorised agents Chapman Tripp



Jo Appleyard
Partner
12 May 2023

Address for service of submitter:

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Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: MGZ Investments Limited **Last name:** MGZ Investments Limited

Organisation: MGZ Investments Limited

On behalf of:

Preferred method of contact: Email

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City: Christchurch

Country: New Zealand

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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

Plan Change 14 Submission-65 Parkstone Avenue-FINAL

Form 5
Submission on notified proposal for a Plan Change
Clause 6 of Schedule 1, Resource Management Act 1991

To: **Christchurch District Council**

Name of Submitter: **MGZ Investments Limited**

Background

1. The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (**Amendment Act**) requires the Christchurch City Council (**Council**) to include Medium Density Residential Standards (**MDRS**) and to give effect to the National Policy Statement on Urban Development 2020 (**NPS-UD**) in its District Plan. The Council has sought to give effect to this requirement through the notification of Plan Change 14 - Housing and Business Choice (**PC14**) and Plan Change 13 - Heritage (**PC13**).
2. With respect to residential zones, the Amendment Act requires that:
 - (a) every residential zone in an urban environment of a specified territorial authority must give effect to policy 3 of the NPS-UD in that zone; and
 - (b) a territorial authority may create new residential zones or amend existing residential zones.
3. With respect to non-residential zones, the Amendment Act further requires that:
 - (a) the territorial authority must ensure that the provisions in its district plan for each urban non-residential zone within the authority's urban environment give effect to the changes required by policy 3 of the NPS-UD; and
 - (b) a territorial authority may create new urban non-residential zones or amend existing urban non-residential zones.
4. The public notice states that the changes proposed for PC14 are "extensive" and include:
 - (a) increasing height limits in and around the central city, and in suburban centres;
 - (b) changes to rules within commercial zones to ensure high quality urban environments and be more enabling of activities without the need for resource consent;
 - (c) medium and high density residential zones with new rules are being introduced across all urban residential areas;

- (d) rezoning of industrial areas near the central city for housing and mixed-use activities;
- (e) introducing qualifying matters to reduce the scale and density of buildings enabled by the MDRS and NPS-UD is reduced; and
- (f) amending objectives, policies, and other provisions throughout the District Plan.

Introduction

5. This is a submission on PC14 made by MGZ Investments Limited (**the submitter**). The submitter has interests in the property legally described as Lot 36 Deposited Plan 27979 as held within the Record of Title CB10A/1265, located at 65 Parkstone Avenue in Ilam, Christchurch (**the site**).
6. The property is depicted in **Figure 1** below.



Figure 1 Location of the property within black boundaries, with zoning illustrated (CCC District Plan – PC14 Maps).

7. The property is located on Parkstone Avenue which is a collector road. The property has legal access from Parkstone Avenue.
8. The property is located within the Residential Suburban Zone under the operative District Plan. The site is proposed to be zoned as Medium Density Residential Zone under PC14.

Specific provisions of the plan change that this submission relates to

9. The submitter has an interest in the plan change as a whole and therefore this submission relates to all provisions and zonings of the plan change. The submitter has a specific interest in all provisions and zoning that relate to the properties referred to above.

Submission

10. The submitter both **supports** and **opposes** the plan change as notified. More specifically:
 - (a) the submitter supports the intensification of urban form to provide for additional development capacity, particularly near the city and commercial centres, and supports any provisions or changes to the District Plan that will achieve this outcome; and
 - (b) the submitter opposes any provisions or changes that will adversely affect the outcome in (a);
 - (c) the submitter requests that the site and surrounding properties are rezoned to High Density Residential, better reflecting the site context in an area of high housing demand and better giving effect to the NPS-UD.
11. Policy 3 of the NPS-UD is of direct relevance, whereby at sub clause (d) it directs that the district plan is to enable building heights and density of urban form commensurate with the level of commercial activity and community services.
12. The submitter's site and surrounding locale is ideally suited for a higher density of development, being in a location that exhibits a clear and immediate need for further housing supply in a convenient location to public transportation.
13. The Submitter also considers that the density standards as set out in the Amendment Act best achieve the NPS-UD, and PC14 should be amended to reflect those.
14. Rezoning the site to provide for high density residential development along with commensurate changes to the District Plan to provide for this submission and give effect to the NPS-UD will:
 - (a) enable more people to live in an urban environment where there is a high demand for housing in the area, relative to other areas in the urban environment;
 - (b) contribute to the social and economic well-being of communities and meet the reasonably foreseeable needs of future generations;
 - (c) represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means;
 - (d) give effect to the NPS-UD (notably Policy 3) and Canterbury Regional Policy Statement; and
 - (e) promote the sustainable management of natural and physical resources, will be consistent with Part 2 of the Resource Management Act 1991 and ultimately achieve its purpose.

Relief Sought

15. The submitter seeks that the NPS-UD is properly and fully given effect to through the provisions and zoning of PC14 through the intensification of development through enabling plan provisions and an increase in development capacity for residential and business use across the district.
16. The Submitter primarily seeks the following from the Council:
- (a) the submitters site and the surrounding area be rezoned to High Density Residential; or
 - (b) the proposed Medium Density Zone is further enabled to provide a higher density of development;
 - (c) reject, refuse, or otherwise decline the Qualifying Matters that do not align with that directed by the Central Government through the Amendment Act.
 - (d) any other additional or consequential relief to the District Plan, including but not limited to, the maps, issues, objectives, policies, rules, controls/discretions, assessment criteria and explanations that will give effect to the matters raised in this submission and the relevant planning legislation.

Other

17. The submitter could not gain an advantage in trade competition through this submission.
18. The submitter wishes to be heard in support of this submission.
19. If others make similar submissions, the submitter will consider presenting a joint case at any hearing.

DATED 12 May 2023



pp. _____

MGZ Investments Limited

Address for Service: Town Planning Group
 PO Box 35
 Christchurch 8014

Contact Person: Anita Collie
Cell: 021 568 335
E-mail: anita@townplanning.co.nz

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Michelle **Last name:** Grinlinton-Hancock

Organisation: Kiwi Rail

On behalf of:

Preferred method of contact Email

Postal address: PO Box 593

Suburb:

City:

Country: New Zealand

Postcode: 6140

Email: Michelle.Grinlinton-Hancock@kiwirail.co.nz

Daytime Phone: 027 246 4427

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

KiwiRail Submission

12 May 2023

To: Christchurch City Council (**Council**)

Subject: Submission on Plan Change 14 to the Christchurch District Plan (**Plan Change 14**)

Scope and nature of submission

1. KiwiRail welcomes the opportunity to provide feedback on Plan Change 14 to enable intensification of housing in urban areas as required under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (**Amendment Act**).
2. This submission relates to the following provisions of Plan Change 14:
 - (a) identification of the NZ Rail Network as a qualifying matter;
 - (b) setbacks from the rail corridor and the inclusion of appropriate matters of discretion; and
 - (c) inclusion of vibration provisions.
3. KiwiRail could not gain an advantage in trade competition through this submission.

KiwiRail's operations

4. KiwiRail is the State-Owned Enterprise responsible for the construction, maintenance and operation of New Zealand's rail network. KiwiRail is also a Requiring Authority that holds railway purpose designations in District Plans throughout New Zealand.
5. KiwiRail's national railway network (which comprises of 3,700km of track, over 200 locomotives, 18,100 hectares of land and 1,350 modern and heritage buildings)¹ is a nationally and regionally significant infrastructure asset. The rail network is critical to the safe and efficient movement of freight and passengers throughout New Zealand, and forms an essential part of the national transportation network and the wider supply chain. New Zealanders have invested significantly in the rail network and it is a critical public asset.
6. The benefits of rail to the New Zealand economy were estimated in 2019 to be in the order of \$1.7 – 2.1 billion.² The economic significance of rail and the critical role it plays in reducing New Zealand's carbon emissions has been recognised by the Government through its continued investment in rail infrastructure. Transport modal shifts to more climate-friendly modes of transport, like rail, are critical to reduce carbon emissions. As a result, rail is experiencing a renaissance as evidenced by the significant investment being made by the Government to reinvigorate the railway network, demonstrating a strong and continued confidence in rail's current and future potential.

¹ Half Year Annual Report 2022 and Unaudited Financial Statements for the Six Months Ended 31 December 2021 (KiwiRail, 2022) at page 5.

² The Value of Rail in New Zealand – Report for the Ministry of Transport (EY, Wellington, 2021) at page 8.



7. In the most recent budget, the Government allocated \$349 million to replace and modernise New Zealand rail assets,³ which has gone towards a number of major projects nationwide, including the rejuvenation of the Northland railway lines, the reopening of the Napier to Wairoa line, establishing a multi-million dollar regional freight hub in Palmerston North, and significant upgrades to the Auckland, Wellington and Hamilton metro networks.
8. KiwiRail's Main South Line, Midland Line, Hornby Industrial Line, and Main North Line pass through the Christchurch District. All these lines are of regional and national importance, supporting the movement of freight and passengers through the country via rail. Growth in use of these lines is expected as part of the mode shift in freight moving off roads and onto rail as part of New Zealand's goals to reduce emissions from transport.

Urban Development around the Rail Corridor

9. The fundamental driver of the Amendment Act and Plan Change 14 is to enable intensification of housing in urban areas. KiwiRail supports urban development, including around transport nodes, and recognises the benefits of co-locating housing near transport corridors.
10. However, it is critical that Plan Change 14 provides for adequate management of the interface between urban development and lawfully established, critical infrastructure, such as the railway network. This is necessary to ensure our communities are built in healthy living environments, and the railway network can operate and develop in the future without constraint. An integrated and proactive approach to planning is critical to support the overall vision of our urban environments, and to ensure that our transport network can support the increasing growth and housing intensification.
11. The nature of railway operations means KiwiRail cannot fully internalise all its effects within the railway corridor boundaries. Environmental legislation and caselaw recognises the lawful emission of such effects. Increasing development around railway corridors consequentially means the introduction of more sensitive receivers to adverse effects of existing and lawful railway activities. With a proposed increase in sensitive activities in proximity to the railway corridor as a result of the increased density enabled by Plan Change 14, KiwiRail is concerned that without appropriate planning measures in place at a territorial level, the risk of adverse health and amenity effects impacting people locating in proximity to the railway corridor, and reverse sensitivity effects constraining its operations is significantly elevated.
12. The two primary ways which KiwiRail seeks to manage this interface at a national level is through the inclusion of the following controls in District Plans:
 - (a) **Noise and vibration controls** – requiring acoustic insulation and ventilation to be installed in new (or altered) sensitive uses within 100m of the railway corridor. Within 60m of the railway corridor, controls are sought that buildings containing new (or altered) sensitive uses are constructed to manage the impacts of vibration. These controls are important to ensure new development is undertaken in a way that achieves a healthy living environment for people locating within proximity to

³

Wellbeing Budget 2022 – A Secure Future (New Zealand Government, Wellington, 2022) at page 82.



the railway corridor, minimising the potential for complaints about the effects of the railway network; and

- (b) **Boundary setbacks** – requiring a "no-build" setback within 5m of the railway corridor for new buildings or structures on sites adjoining the railway corridor. This is to ensure that people can use and maintain their land and buildings safely without needing to extend out into the railway corridor, minimising the risks of physical interference on railway operations and health and safety hazards on these residents.

Setbacks

13. The existing provisions of the District Plan include 4m setbacks from the rail corridor across a range of urban zones.⁴
14. In respect of the Amendment Act and Plan Change 14, the MDRS mandate a 1m setback from side and rear yards, and a 1.5m setback from front yards. However, the Amendment Act enables the Council to amend the MDRS and intensification requirements where a "qualifying matter" applies. The qualifying matters expressly include:⁵
- (a) the need to give effect to a designation (but only in relation to the land that is subject to that designation); and
- (b) matters "required for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure". The rail network is nationally significant infrastructure for the purposes of the Amendment Act.
15. The Council has recognised the rail corridor as a qualifying matter in Plan Change 14,⁶ and has retained the existing building setback of 4m from the rail corridor within the District Plan.
16. KiwiRail supports the District Plan provisions requiring a setback from the rail corridor. However, KiwiRail considers 5m is the appropriate distance for setbacks instead of the 4m provided for under the District Plan. This distance is especially necessary given the increased building height and reduced height to boundary controls enabled under the MDRS which increase the risk of potential interference with the rail corridor from maintenance and other activities being undertaken on sites adjoining the rail corridor.
17. KiwiRail is also seeking an addition to the matters of discretion to require specific consideration by decision makers of the effects on the rail corridor where the setback from the rail corridor is infringed. KiwiRail considers a matter of discretion directing consideration of impacts on the safety and efficiency of the rail corridor is appropriate in situations where the 5m setback standard is not complied with.

⁴ See for example, 14.5.2.7

⁵ RMA, Sections 771(e) and (g); 770(e) and (g).

⁶ Chapter 6.1A Qualifying matters, Table 1 "Safe or efficient operation of nationally significant infrastructure (NZ Rail Network).



Noise and vibration

18. Rule 6.1.7.2.1 in the District Plan contains activity standards relating to sensitive activities near roads and railways. Plan Change 5E to the District Plan proposed to replace Rule 6.1.7.2.1 primarily to improve clarity and efficiency of the rule. The Panel has issued its recommendation on Plan Change 5E recommending the Rule 6.1.7.2.1 – Sensitive activities near roads and railways and replace with new Rule 6.1.7.2.1– Sensitive activities near roads and railways outside the Central City. KiwiRail seeks that the new Rule 6.1.7.2.1 be retained as set out in the Panel decision.
19. The Operative District Plan and Plan Change 5E do not contain any vibration controls to ensure that buildings containing new (or altered) sensitive uses are constructed to manage the impacts of vibration.
20. Acoustic and vibration standards are important controls to ensure the ongoing health and wellbeing of the occupants of the higher density living areas and are instrumental in ensuring that reverse sensitivity effects on rail are minimised particularly where intensive residential development is proposed adjacent to the rail corridor. The acoustic and vibration standards seek to ensure that where urban development co-locates near the rail corridor, the health and amenity of residents is not adversely affected, and the rail corridor is protected from reverse sensitivity effects.
21. KiwiRail considers it is appropriate that these controls apply on a district-wide basis as related provisions that are necessary to ensure intensification in and around the rail corridor is appropriately managed (particularly in the context of the additional intensification proposed through Plan Change 14). KiwiRail seeks that a vibration standard be inserted for buildings within 60m of the rail corridor to ensure that vibration effects are appropriately addressed.

General reasons for the submission

22. The identification of the NZ Rail Network as a qualifying matter, the amendments to the acoustic provisions, the inclusion of vibration provisions and setbacks from the rail corridor (as proposed to be amended below) will:
 - (a) promote sustainable management of resources, achieve the purpose of the RMA, and are not contrary to Part 2 and other provisions of the RMA;
 - (b) meet the reasonably foreseeable needs of future generations;
 - (c) enable the social, economic and cultural wellbeing of the community in Christchurch City; and
 - (d) provide and promote the greatest health, safety and amenity outcomes and preserve operational and developmental capacity and efficiency for nationally significant infrastructure.



Relief Sought

23. KiwiRail seeks:

- (a) the retention of identification of the NZ Rail Network as a qualifying matter;
- (b) amendment to the activity standards in Rule 6.1.7.2 (as amended by Plan Change 5E) to include the following standard relating to vibration:

<p>NOISE- RX – Permitted activity</p>	<p>KiwiRail seek that vibration controls be included to apply to sensitive uses within 60m of the legal boundary of any railway boundary.</p> <p>KiwiRail seek that non compliance with the permitted standards be assessed as a restricted discretionary activity with appropriate matters of discretion.</p>	<p><u>Indoor railway vibration</u></p> <p><u>1. Any new buildings or alterations to existing buildings containing a noise sensitive activity, within 60 metres of the boundary of any railway network, must be protected from vibration arising from the nearby rail corridor.</u></p> <p><u>2. Compliance with standard 1 above shall be achieved by a report submitted to the council demonstrating compliance with the following matters:</u></p> <p><u>(a) the new building or alteration or an existing building is designed, constructed and maintained to achieve rail vibration levels not exceeding 0.3 mm/s vw,95 or</u></p> <p><u>(b) the new building or alteration to an existing building is a single-storey framed residential building with:</u></p> <ol style="list-style-type: none"> <u>i. a constant level floor slab on a full-surface vibration isolation bearing with natural frequency not exceeding 10 Hz, installed in accordance with the supplier's instructions and recommendations; and</u> <u>ii. vibration isolation separating the sides of the floor slab from the ground; and</u> <u>iii. no rigid connections between the building and the ground.</u> <p><u>Matters of discretion</u></p> <p><u>(a) location of the building;</u></p> <p><u>(b) the effects of any non-compliance with the activity specific standards;</u></p> <p><u>(c) special topographical, building features or ground conditions which will mitigate vibration impacts;</u></p> <p><u>(c) the outcome of any consultation with KiwiRail.</u></p>
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- (c) amendment to the setback provisions in the Residential and Commercial Zones to provide for a 5 metre setback and amendments to the matters of discretion to direct consideration of the effects on the rail corridor.

(The text introduced through Plan Change 14 is shown in black underline and strikethrough and KiwiRail's proposed addition is shown in red underline below).

<p>14.5 Rules – Residential Medium Density Residential Zone</p>	<p>14.5.2.7 Minimum building setbacks from internal boundaries and railway lines</p> <p>a. The minimum building setback from internal boundaries shall be:</p> <p>...</p> <p>vi. <u>v.</u> Buildings, balconies and decks on sites adjacent to or abutting a designated rail corridor <u>4-5</u> metres from the rail corridor boundary</p>
<p>14.5.1.3 Restricted discretionary activities</p>	<p>RD12. Buildings that do not meet Rule 14.5.2.7(v) relating to rail corridor boundary setbacks</p> <p>The Council's discretion shall be limited to the following matters:</p> <p>a. Whether the reduced setback from the rail corridor will enable buildings to be maintained without requiring access above, over, or on the rail corridor <u>while providing for the safe and efficient operation of the rail network.</u></p>
<p>14.6 Rules – <u>High Density</u> Residential Central City Zone</p>	<p>14.6.2.3 Road boundary building Setbacks</p> <p><u>a. Buildings must be set back from the relevant boundary by the minimum depth listed below:</u></p> <p><u>i. Front: 1.5 metres</u></p> <p><u>ii. Side: 1 metre</u></p> <p><u>iii. Rear: 1 metre (excluded on corner sites)</u></p> <p><u>(iv). Rail corridor boundary: 5 metres</u></p>
<p>14.6.1.3 Restricted discretionary activities</p>	<p>RD10</p> <p>a. Buildings that do not meet Rule 14.6.2.3 – Setbacks.</p> <p>b. Any application arising from Rule 14.6.2.3.a.i shall not be limited or publicly notified.</p> <p>c. Any application arising from this rule, for up to three residential units per site shall not be publicly notified.</p>



	<p><u>d. Any application arising from (iv) shall not be publicly notified and shall be limited notified only to KiwiRail (absent its written approval).</u></p> <p>The Council's discretion shall be limited to the following matters:</p> <p>a. Impacts on neighbouring property – Rule 14.15.3.a</p> <p><u>b. Whether the reduced setback from the rail corridor will enable buildings to be maintained without requiring access above, over, or on the rail corridor while providing for the safe and efficient operation of the rail network.</u></p>
15.4 Rules – Commercial Core <u>Town Centre Zone</u>	<p>15.4.2.9 Minimum building setback from railway corridor</p> <p>a. For sites adjacent to or abutting the railway line, the minimum building setback for buildings, balconies and decks from the rail corridor boundary shall be <u>4 5</u> metres.</p>
15.45.2 – Built form standards – Commercial Core <u>Local Centre Zone</u>	<p>15.45.2.9 Minimum building setback from railway corridor</p> <p>a. For sites adjacent to or abutting the railway line, the minimum building setback for buildings, balconies and decks from the rail corridor boundary shall be <u>4 5</u> metres.</p>
15.56.2 Built form standards – Commercial Local <u>Neighbourhood Centre Zone</u>	<p>15.56.2.8 Minimum building setback from railway corridor outside the Central City</p> <p>a. For sites adjacent to or abutting the railway line, the minimum building setback for buildings, balconies and decks from the rail corridor boundary shall be <u>4 5</u> metres.</p>
15.67.2 Built form standards – Commercial Banks Peninsula Zone	<p>15.67.2.8 Minimum building setback from railway corridor</p> <p>a. For sites adjacent to or abutting the railway line, the minimum building setback for buildings, balconies and decks from the rail corridor boundary shall be <u>4 5</u> metres.</p>
15.78.2. Built form standards – Commercial Retail Park <u>Large Format Retail Zone</u>	<p>15.78.2.8 Minimum building setback from railway corridor</p> <p>a. For sites adjacent to or abutting the railway line, the minimum building setback for buildings, balconies and decks from the rail corridor boundary shall be <u>4 5</u> metres.</p>
15.89.2 Built form standards – Commercial Office Zone	<p>15.89.2.9 Minimum building setback from railway corridor</p> <p>a. For sites adjacent to or abutting the railway line, the minimum building setback for buildings, balconies and decks from the rail corridor boundary shall be <u>4 5</u> metres.</p>



15.910.2 Built form standards – Commercial Mixed Use Zone	<p>15.910.2.8 Minimum building setback from railway corridor</p> <p>a. For sites adjacent to or abutting the railway line, the minimum building setback for buildings, balconies and decks from the rail corridor boundary shall be 4.5 metres.</p>
15.1314.3 Matters of discretion for built form standards	<p>15.1314.3.10 Minimum building setback from the railway corridor</p> <p>a. Whether the reduced setback from the rail corridor will enable buildings to be maintained without requiring access above, over, or on the rail corridor, <u>while providing for the safe and efficient operation of the rail network.</u></p>

24. KiwiRail wishes to be heard in support of this submission. If other parties make similar submissions, KiwiRail would consider presenting a joint case with those parties at the hearing.

Yours faithfully



Michelle Grinlinton-Hancock
RMA Team Leader



Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Catherine **Last name:** Gallagher

On behalf of:

Preferred method of contact: Email

Postal address: 35 Watford Street

Suburb:

City:

Country: New Zealand

Postcode: 8052

Email: gpv@xtra.co.nz

Daytime Phone: 021735004

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

Catherine

Robson, Gina

From: Katie Gallagher <gpv@xtra.co.nz>
Sent: Friday, 12 May 2023 2:31 pm
To: Engagement
Subject: submission for PC14 Plan change

Save time and do it online
ccc.govt.nz/haveyoursay

Have your say Housing and Business Choice Plan Change 14 and Heritage Plan Change 13

Clause 6 of Schedule 1 Resource Management Act 1991

Before we get started we'd like to ask a few questions about you. This helps us better understand who we are hearing from.

Gender: Male Female Non-binary/another gender
Age: Under 18 years 18-24 years 25-34 years 35-49 years 50-64 years
 65-79 years over 80 years
Ethnicity: New Zealand European Māori Pacific Peoples Asian
 Middle Eastern/Latin American/African Other European Other

* Required information

Name CATHERINE GALLAGHER (KATIE)
Address 35 WATFORD STREET, STRAWAN Postcode 8052
Email gpv@xtira.co.nz Phone no. 021 735004

If you are responding on behalf of a recognised organisation, please provide:

Organisation's name _____
Your role _____

Trade competition and adverse effects* (select appropriate)

I could / could not gain an advantage in trade competition through this submission.

If you are a person who could gain an advantage in trade competition through this submission, are you directly affected by an effect of the proposed plan change/part of the plan change that -

(a) adversely affects the environment, and
(b) does not relate to the trade competition or the effects of trade competition? Yes No

* A person who could gain an advantage in trade competition through the submission may make a submission only if you answered 'Yes' to the above, as per clause 6(4) of Schedule 1 of the Resource Management Act 1991.

Please indicate by ticking the relevant box whether you wish to be heard in support of your submission*

I wish to speak in support of my submission on Plan Change 13
 I wish to speak in support of my submission on Plan Change 14
 I do not wish to speak.

Joint submissions (Please tick this box if you agree)

If others make a similar submission, I will consider presenting a joint case with them at the hearing.

If you have used extra sheets for this submission, please attach them to this form and indicate below*

Yes, I have attached extra sheets. No, I have not attached extra sheets.

Signature of submitter (or person authorised to sign on behalf of submitter)

A signature is not required if you make your submission by electronic means.

Signature Catherine Gallagher Date 12/5/23

Have your say
Housing and Business Choice Plan Change 14

The specific provisions of the plan change that my submission relates to are as follows:^{7.2.1}
 (Please continue on separate sheet(s) if necessary.) Sections 14.2.8.5 and 14.2.8.6 + 14.2.4.2 + 7.2.1.2 + 7.2.1.1

The huge impact on parking in what is already a congested area particularly around the St Andrew's College area. Issues with congestion, double parking and one-way driving practices will be exacerbated with intense residential development. Increased pressure on our drainage system could be catastrophic - Branchley Ave is already prone to severe flooding (latest was on 11/6/21). The character of the locality will be destroyed. The Plan Change would have a negative impact on parking for vulnerable members of the community including the elderly + disabled.

My submission is that:
 (You should clearly state whether you support or oppose the specific proposed provisions or wish to have them amended. You should also state the reasons for your views. Please continue on separate sheet(s) if necessary.)

I oppose the provision of PC14 as they will destroy the character of the Strowan locality and will put enormous + unsafe pressure on already stretched amenities + infrastructure.

I seek the following decision from the Council:

(Please give precise details stating what amendments you wish to see made to the proposed Plan Change. Please continue on separate sheet(s) if necessary.)

I would like to see the PC14 amended to limiting the HR2 north from Mainvale centre to Hector St / Innes Rd and south from Papanui commercial centre to Bligh Rd and not extending the HR2 along this stretch of Papanui Rd through the Strowan suburbs.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Anthony **Last name:** Gallagher

On behalf of:

Preferred method of contact: Email

Postal address: 35 Watford Street

Suburb:

City:

Country: New Zealand

Postcode: 8052

Email: gpv@xtra.co.nz

Daytime Phone: 0272944010

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
Anthony

Have your say

Housing and Business Choice Plan Change 1 and Heritage Plan Change 13

Clause 6 of Schedule 1 Resource Management Act 1991

Before we get started we'd like to ask a few questions about you. This helps us better hearing from.

Gender: Male Female Non-binary/another gender

Age: Under 18 years 18-24 years 25-34 years 35-49 years
 50-64 years 65-79 years over 80 years

Ethnicity: New Zealand European Māori Pacific Peoples Asian
 Middle Eastern/Latin American/African Other European

* Required information

Name: ANTHONY GALLAGHER (TONY)

Address: 35 WATFORD ST, STROWAN

Email: gpv@xtra.co.nz Phone no. _____

If you are responding on behalf of a recognised organisation, please provide:

Organisation's name: _____

Your role: _____

Trade competition and adverse effects* (select appropriate)

I could / could not gain an advantage in trade competition through this

If you are a person who could gain an advantage in trade competition through this affected by an effect of the proposed plan change/part of the plan change that –

- (a) adversely affects the environment, and
- (b) does not relate to the trade competition or the effects of trade competition

* A person who could gain an advantage in trade competition through the submission may make a submission on the basis of clause 6(1)(a) of Schedule 1 of the Resource Management Act 1991

Have your say
Housing and Business Choice Plan Change 14

The specific provisions of the plan change that my submission relates to are as follows:^{7.2.1}
(Please continue on separate sheet(s) if necessary.) Sections 14.2.8.5 and 14.2.8.6 + 14.2.4.2 + 7.2.1.2 + 7.2.1.1

The huge impact on parking in what is already a congested area particularly around the St Andrew's College area. Issues with congestion, double parking and one-way driving practices will be exacerbated with intense residential development. Increased pressure on our drainage system could be catastrophic - Branchley Ave is already prone to severe flooding (latest was on 11/6/21). The character of the locality will be destroyed. The Plan Change would have a negative impact on parking for vulnerable members of the community including the elderly + disabled.

My submission is that:
(You should clearly state whether you support or oppose the specific proposed provisions or wish to have them amended. You should also state the reasons for your views. Please continue on separate sheet(s) if necessary.)

I oppose the provision of PC14 as they will destroy the character of the Stronan locality and will put enormous + unsafe pressure on already stretched amenities + infrastructure.

I seek the following decision from the Council:

(Please give precise details stating what amendments you wish to see made to the proposed Plan Change. Please continue on separate sheet(s) if necessary.)

I would like to see the PC14 amended to limiting the HR2 north from Mainvale centre to Hector St / Innes Rd and south from Papanui commercial centre to Bligh Rd and not extending the HR2 along this stretch of Papanui Rd through the Stronan suburbs.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Finn **Last name:** Jackson

On behalf of:

Preferred method of contact: Email

Postal address: Flat 1, 108A Ruskin Street

Suburb:

City:

Country: New Zealand

Postcode: 8024

Email: finn.jackson982@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.

Attached Documents

File

Finn

Robson, Gina

From: Generation Zero <noreply@123formbuilder.com>
Sent: Friday, 12 May 2023 9:40 pm
To: Engagement
Subject: CCC District Plan Changes (PC14) - Generation Zero Quick Submit / 531

This is a submission on the proposed Christchurch District Plan changes via the Generation Zero quick submission form. The feedback below is on PC14.

Form Summary

1. First / Last name	Finn Jackson
2. Email address	finn.jackson982@gmail.com
3. Postal Address	Flat 1, 108A Ruskin Street Addington Christchurch 8024
4. Trade competition/adverse effects:	Option 1: I could not gain in trade competition through this submission
5. Answer if you selected option 2 above:	Are you directly affected by a possible effect of this plan change in a way that it: a. adversely affects the environment, and b. does not relate to the trade competition or the effects of trade competitions
Chapter 6 - Tree Canopy Cover and Financial Contributions	<p>The council will require 20% of new residential developments to be covered by trees, or otherwise pay a financial contribution to help the council plant more trees on public land. Christchurch has an appallingly low tree canopy cover rate of 13% compared to Auckland (18%) and Wellington (30%). Trees have a wide range of environmental, health, social and economic benefits and are important for the future of our city.</p> <p>I support the Tree Canopy Cover rules and Financial Contributions to restore our tree canopy. Trees are important in reducing emissions,</p>

Form Summary

providing shade and temperature control in the summer, alongside the other wide range of economic, health and social effects. I seek that the council retains the tree canopy requirement and contributions plan.

Chapter 14 - Low Public Transport Accessibility Area Qualifying Matter

The council plans to restrict housing in some areas of the city because they are poorly serviced by the lack of current high frequency public transport routes. Some areas solely designated with this qualifying matter such as in Casebrook and Styx are close to rail corridors, existing commercial areas and are serviced by low frequency routes. In the future, these areas could see a boost in service by more buses on current routes or introduction of a commuter rail service.

I oppose the Low Public Transport Accessibility Area Qualifying Matter as I believe that the public transport layout and network will need changes to prepare and accommodate future growth. We should not define future growth in Christchurch based on these routes. This would also artificially limit future housing in our city. I seek that the council drop this qualifying matter.

Chapter 14 - Sunlight Access Qualifying Matter

There are many cities in the world that have high density and are further from the equator than Christchurch. Cities such as Vienna, Copenhagen, Toronto, Geneva, and Calgary are consistently ranked some of the most livable cities in the world. This qualifying matter would reduce the maximum height and size of medium residential buildings below what is legally required. This qualifying matter has been developed with the expressed purpose of protecting and increasing property values rather than increasing the amount of affordable housing for people.

Chapter 14 - High-Density Residential Zone

The council is required by law to allow residential buildings of at least 6 storeys within a 1.2km radius of commercial centres such as malls and the city centre. The council plan to enable this, while also allowing up to 10 storeys for residential buildings closer to the city centre. This would enable a wider range of dense housing development options. It would also allow more people to live close to services and amenities.

I support high-density housing near the city and commercial centres. We need to allow more people to live near services and amenities to reduce car dependency. This would allow more people to take active and public transport to commute, shop and play. I seek that the council enable 6 to 10 storeys for residential buildings near commercial centres.

Any other comments?

I'd like to see the sunlight qualifying matter removed in all zones outside the medium density and low density zones. Keeping it in those areas is a compromise I'm happy to have, but in the high density and mixed use areas in particular it would lead to poor urban design outcomes and limit the amount of housing that can be built.

I'd like to see additional requirements for permeable surfaces in dense areas to prevent flooding.

Form Summary

Finally, I'd like to see some or all corner sites in residential areas rezoned to a new residential mixed use zone, allowing for the development and operation of businesses like cafes, butchers, grocers, dairies and general convenience stores. This would enhance walkability and make for more pleasant, livable neighbourhoods.

The message has been sent from 115.189.97.112 nz at 2023-05-12 on Chrome 113.0.0.0

Entry ID: 203

Referrer: <https://www.generationzero.org/>

Form Host: <https://form.123formbuilder.com/6423130/ccc-district-plan-changes-pc14-generation-zero>

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Andrew **Last name:** Kyle

On behalf of:

Preferred method of contact: Email

Postal address: 643 Yaldhurst Road

Suburb:

City:

Country: New Zealand

Postcode: 7676

Email: schroeder.kyle@xtra.co.nz

Daytime Phone: 0272308194

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

andrew

Robson, Gina

From: Keryn Schroeder <schroeder.kyle@xtra.co.nz>
Sent: Friday, 12 May 2023 3:43 pm
To: Engagement
Subject: Submission - Housing and Business Choice Plan Change (PC14)

Save time and do it online
ccc.govt.nz/haveyoursay

Have your say

Housing and Business Choice Plan Change 14 and Heritage Plan Change 13

Clause 6 of Schedule 1 Resource Management Act 1991

Before we get started we'd like to ask a few questions about you. This helps us better understand who we are hearing from.

Gender: Male Female Non-binary/another gender
Age: Under 18 years 18-24 years 25-34 years 35-49 years 50-64 years
 65-79 years over 80 years
Ethnicity: New Zealand European Māori Pacific Peoples Asian
 Middle Eastern/Latin American/African Other European Other

** Required information*

Name ANDREW KYLE

Address 643 YALDHURST ROAD Postcode 7676

Email Schroeder.kyle@xtra.co.nz Phone no. 0272 308 174

If you are responding on behalf of a recognised organisation, please provide:

Organisation's name _____

Your role _____

Trade competition and adverse effects* (select appropriate)

I could / could not gain an advantage in trade competition through this submission.

If you are a person who could gain an advantage in trade competition through this submission, are you directly affected by an effect of the proposed plan change/part of the plan change that –

(a) adversely affects the environment, and

(b) does not relate to the trade competition or the effects of trade competition? Yes No

* A person who could gain an advantage in trade competition through the submission may make a submission only if you answered Yes to the above, as per clause 6(4) of Schedule 1 of the Resource Management Act 1991.

Please indicate by ticking the relevant box whether you wish to be heard in support of your submission*

I wish to speak in support of my submission on Plan Change 13

I wish to speak in support of my submission on Plan Change 14

I do not wish to speak.

Joint submissions (Please tick this box if you agree)

If others make a similar submission, I will consider presenting a joint case with them at the hearing.

If you have used extra sheets for this submission, please attach them to this form and indicate below*

Yes, I have attached extra sheets. No, I have not attached extra sheets.

Signature of submitter (or person authorised to sign on behalf of submitter)
A signature is not required if you make your submission by electronic means.

Signature Andrew Kyle Date 12-5-2023

Plan Change 14 Submission

By David Lawry:

Supported by Andrew Kyle:

Christchurch City Council (CCC) is predicting the need for 40,000 new houses in Christchurch over the next 30 years.

I Andrew Kyle see the future of Christchurch's housing development being pushed to the West of the city on stable TC1 land. Yaldhurst, Harewood and Islington already has sound infrastructure in place. The proximity to Hornby, (The Hub) has commercial and industrial and is a key employment site. This land is well above the water table at 17-meter static level. It is on a gravel base and does not require expensive remediation work.

I fully support David Lawry's submission. As a landowner in this Yaldhurst area, my family has ties to this area for 123 years. We therefore have been here before the airport existed. They have encroached on what we have been allowed to do on our land and have been seen to be a poor neighbour with a bullying presence. Communication has been poor and there has been no transparency with decibel lines and what this means to landowners in this area.

1. CCC studies have identified large tracks of land that are unfit for housing development due to sea level rise and other flood risks. Unfortunately for the people already living in many of these now identified risk suburbs, they will be adversely impacted. New subdivisions at the foothills of the Port Hills, known to be flood risks, continue to be consented.
2. It is public knowledge that CCC is facing very significant governance failures with respect to its own companies such as Christchurch International Airport (CIAL) and Lyttleton Port Company. These failings extend into the very body that is supported to provide the needed governance, Christchurch city holding corporation (CCHL). The fact that CCHLs past chair was a wanted FBI fugitive is just one indicator of the level of failure. While the current CCC, CEO has worked to address some of these matters there exists a major conflict of issues that are providing significant competitive advantages to, for example CIAL. I refer the panel to my in-depth submissions on this matter in Christchurch Plan Change 5. What is clear however is that due to the 'no surprises clause

requirement' of CCHL to the CCC CEO that regardless of the structure it is the CCC CEO who has the power to direct both the board and if need be actual company CEO's. If the CCC CEO can move to do away with CCHL all together then the real power to direct changed behaviours is held at that position.

3. Plan change 14 is stated as being designed to bring Christchurch's District Plan in line with government direction that has been given via the National Policy Statement-Urban Development (NPS-UD) and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act (The Act) to enable more development in the city's urban footprint.
4. However, it quickly becomes clear via the raft of new and modified Qualifying Matters that what is at play in this plan change, is a move to significantly push back against the new national standards.
5. While the lawyers, consultants, planners and others on billable hours will enjoy this farce the question remains: Where will the needed 40,000 new homes be enabled?
6. It has been indicated that a very high threshold of evidence is needed in order to establish an issue as a Qualifying Matter. The impact of these matters is to defeat the very intent of the Governmental intensification direction. Therefore, it is not surprising that the evidential threshold should be extremely high. The legal battles over what is and is not deemed to be a Qualifying matter will, I submit ensure that the needed intensification will be stalled, significantly.
7. The qualifying Matter that I am submitting on is the CIAL Noise residential activity avoidance contour, specifically the 50 dBA Ldn air noise Contour. This noise level equates to a slightly elevated speech. This contour impacts and negates new residential home building on hundreds of acres surrounding the Christchurch International Airport. These contours were required to be re- evaluated every ten years last due 2017 and are currently subject to protracted re- evaluation following Regional Councils requiring CIAL to do so in 2022.
8. The purpose of the contour regime is stated as ensuring that no curfew will result from noise complaints arising from the airport operations. What is more they are designed to capture the expected noise level when the airport reaches absolute capacity of flight activity. These contours have been exaggerated and inaccurate for in excess of 30 years, yet CCC have enabled this inaccuracy and allowed the competitive advantages that flow to CIALs property management business activities to remain. Additionally CCC has abdicated its statutory requirements to

investigate industrial noise pollution handing this over to a CIAL housed committee. CCC noise control personal take no action with regards to any airport related noise complaints. CCC refuses to even consider alternative methodologies to providing curfew risk reduction, such as contracting out of noise complaint actions. These matters and the associated risks arising from the ongoing lack of remedies have been raised directly to the current CCC CEO. Action by her is needed now if real governance is to be exhibited.

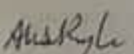
9. If the 50dBA air noise contour is permitted to be entrenched as a Qualifying Matter, then the opportunity for residential housing to be enabled on the safest remaining undeveloped land in Christchurch will be lost. Again, where are these 40,000 new homes going?
10. The fact is that CCC are well aware that the background noise levels due to population levels alone and excluding road noise for a significant proportion of the land under the 50 dBA Ldn air noise contour already exceeds 50dBA. This evidence was provided to them by world leading expert Professor John Paul Clarke during the Judge led Christchurch District Plan hearings but remains ignored. This fact makes a mockery of these development restrictions.
11. One opportunity cost to rate payers is the on-going annual value of thousands of new rates that could potentially be derived from new residential properties that are currently excluded due to this policy.
12. The actual costs outlined in points (9) and (11) are huge. They are being incurred based on an unrealistic, CIAL led and self-serving need for protection from a perceived risk that noise complaints could result in flight operation curfews. Yet the actual risk of CCC ever taking any action against its own company that resulted in a curfew or any action that impeded its operation is zero. The policy provides CIAL with a huge competitive advantage to its already monopolistic aviation operations and perversely its property development and management operations. It is not by chance that CIAL earns more from property development and management than from aviation activities. Yet the CCC, COE fails to intervene.
13. Then there is the issue of CIAL desiring to build a new wide body aircraft capable International Airport at Tarras. Why are CCC providing air noise contour protection for CIAL at Christchurch International Airport, based on an unrealistic total runway capacity, and incurring the opportunity costs outlined, when it is clear that CIAL intends to move its aviation market growth strategies away from Christchurch to Tarras? Already CIAL has significantly reduced its annual dividend to CCHL, CCC and therefore

rate payers. Already CIAL via FX issued bonds have raised several hundred million of dollars in new debt. Conservative estimates obtained indicate that the cost of the new runway if built at Tarras would exceed 1 billion dollars. To be clear this is just the runway tarmac asphalt alone not terminals and the numerous other facilities. Then there is the tricky issue that CIAL has failed to actually buy sufficient land to build the runway needed for the wide body aircraft operations. Additionally there are very significant consenting hurdles including the fact that the proposed runway is to be built on the New Zealand Crested Grebes main breeding ground. Where are the funds coming from?

14. I mentioned Governance failures at CCHL, which may or may not have been addressed. I submit that for all the reasons outlined there needs to be an urgent review as to how the situation has been reached whereby CIAL have managed to become the dog and CC the tail being wagged.

The sought remedies

1. That the 50dBA air noise contour be excluded from becoming a Qualifying Matter
2. That an urgent CCC CEO level review of the risk to housing crisis solutions and potential rate revenue earning opportunity that will be lost if hundreds of acres of safe land is to be excluded from residential development opportunity based on the curfew risk myth.
3. That the CCC CEO urgently consider the ramifications of supporting CIAL led evidence before the ECAN administration revaluation of the existing air noise contour using airport total future capacity. Is the air noise contour regime fit for purpose given that CIAL is moving its market growth strategies to Tarras? Why have other options not even been considered? Where are the funds for this new airport coming from and how does encouraging passengers to avoid Christchurch in favour of Tarras economically assist Christchurch's economy. Where is the transparency of a cost benefit analysis supporting this huge project? Indeed where is the much talked about Governance, transparency and guidance so badly required in order to correct the current flawed behaviours and CIAL project pathways?


Andrew Kyle.

Sent from my iPhone

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Brendon **Last name:** Liggett

Organisation: Kāinga Ora – Homes and
Communities

On behalf of:

Preferred method of contact Email

Postal address: PO Box 74598

Suburb:

City:

Country: New Zealand

Postcode: 1051

Email:

developmentplanning@kaingaora.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

kaingaora

File
KaingaOra_CCCPC14Submission_CityCentre
KaingaOra_CCCPC14Submission_PapanuiMerivale
20230512 Kainga Ora - ChChDP PC 13 submission vSIGNED

Robson, Gina

From: Lezel Beneke <lezel.beneke@kaingaora.govt.nz>
Sent: Friday, 12 May 2023 8:53 pm
To: Engagement
Cc: developmentplanning
Subject: RE: Kainga Ora Submission on Plan Change 14 of the Operative Christchurch District Plan
Attachments: KaingaOra_CCCPC14Submission_PapanuiMerivale.pdf;
KaingaOra_CCCPC14Submission_CityCentre.pdf

Appendix 3 – Maps of HRZ and Height Variation Control – Maps Papanui and City Centre

From: Lezel Beneke
Sent: Friday, 12 May 2023 8:52 PM
To: 'engagement@ccc.govt.nz' <engagement@ccc.govt.nz>
Cc: developmentplanning <developmentplanning@kaingaora.govt.nz>
Subject: RE: Kāinga Ora Submission on Plan Change 14 of the Operative Christchurch District Plan

Appendix 3 – Maps of HRZ and Height Variation Control – Maps Riccarton and Hornby

From: Lezel Beneke
Sent: Friday, 12 May 2023 8:51 PM
To: 'engagement@ccc.govt.nz' <engagement@ccc.govt.nz>
Cc: developmentplanning <developmentplanning@kaingaora.govt.nz>
Subject: RE: Kāinga Ora Submission on Plan Change 14 of the Operative Christchurch District Plan

Kia ora,

Cognisant of the size of the document. I have broken the submission into:

- Cover letter
- Appendix 1 – Table of submission points
- Appendix 2 – Metropolitan Centre Zone provisions

I will send Appendix 3 separately.

**Lezel Beneke** MNZPI. BPlan(Hons)

Principal Development Planner

Development Planning

Urban Planning and Design

Mobile: 021 428 055

Email: lezel.botha@kaingaora.govt.nz

Freephone: 0800 801 601 | Mainline: (021) 428 055 | Kāinga Ora - Homes and Communities
P.O.BOX 2628, WELLINGTON, 6140 | New Zealand Government | www.kaingaora.govt.nz

From: Lezel Beneke**Sent:** Friday, 12 May 2023 8:48 PM**To:** 'engagement@ccc.govt.nz' <engagement@ccc.govt.nz>**Cc:** developmentplanning <developmentplanning@kaingaora.govt.nz>; Brendon Liggett <Brendon.Liggett@kaingaora.govt.nz>**Subject:** RE: Kāinga Ora Submission on Plan Change 14 of the Operative Christchurch District Plan

Kia ora,

Please find attached the Kāinga Ora submission on Plan Change 14 of the Operative Christchurch District Plan.

Please let us know if you require word documents.

This attachment includes:

- Cover letter
- Appendix 1 – Table of submission points
- Appendix 2 – Metropolitan Centre Zone provisions
- Appendix 3 – Maps of HRZ and Height Variation Control

Please confirm receipt of the submission once received.

Kind Regards,

**Lezel Beneke** MNZPI. BPlan(Hons)

Principal Development Planner

Development Planning

Urban Planning and Design

Mobile: 021 428 055

Email: lezel.botha@kaingaora.govt.nz

Freephone: 0800 801 601 | Mainline: (021) 428 055 | Kāinga Ora - Homes and Communities

P.O.BOX 2628, WELLINGTON, 6140 | New Zealand Government | www.kaingaora.govt.nz

www.govt.nz - your guide to finding and using New Zealand government services

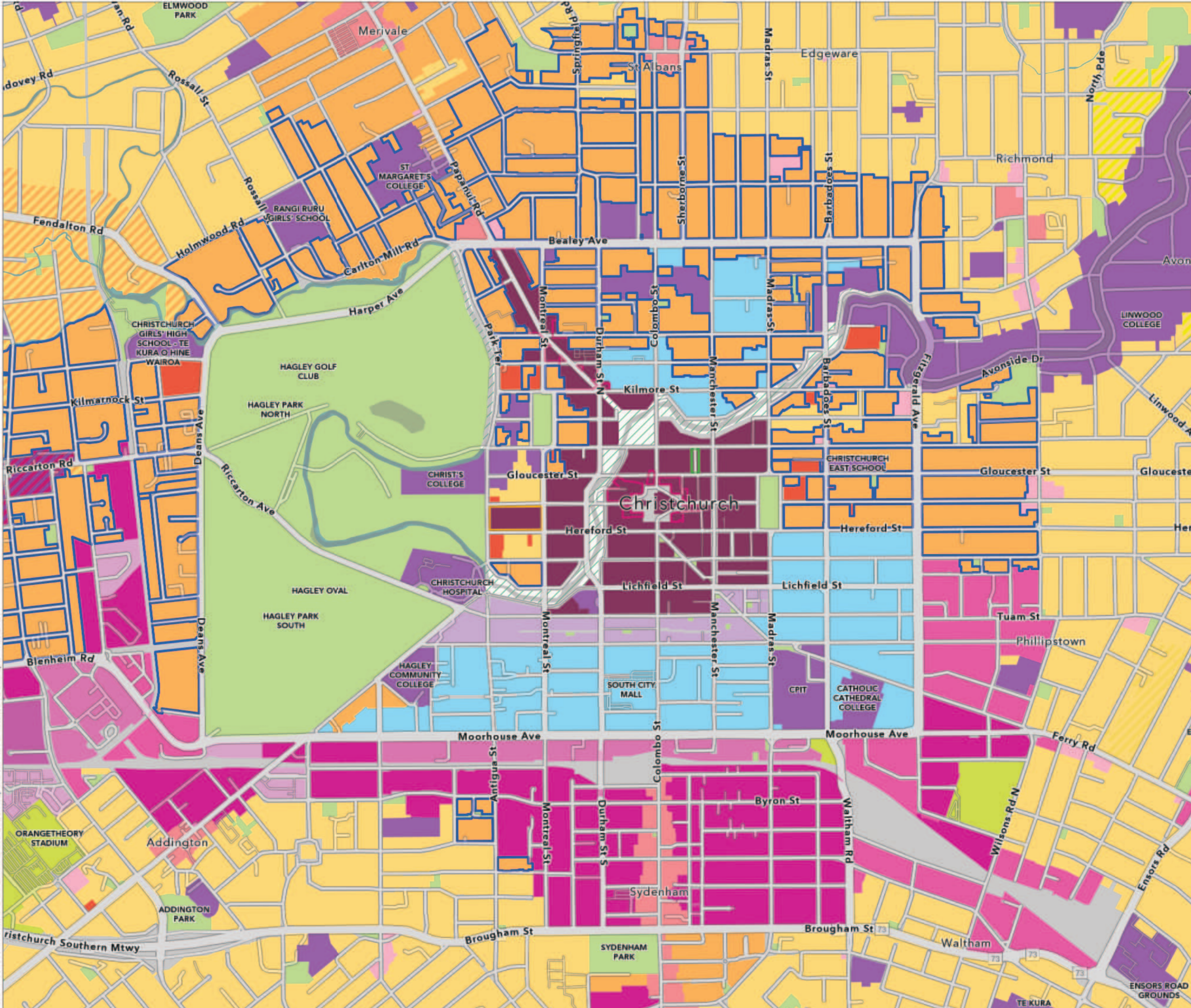
Any opinions expressed in this message are not necessarily those of Kāinga Ora. This message and any files transmitted with it are confidential, may be legally privileged, and are solely for the use of the intended recipient. If you are not the intended recipient or the person responsible for delivery to the intended recipient, you have received this message in error.

Please:

- (1) reply promptly to that effect, and remove this email, any attachment and the reply from your system;
- (2) do not use, disclose or act on this email in any other way. Thank you.

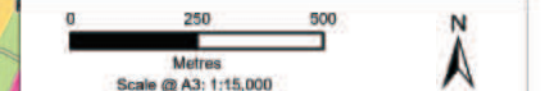
Christchurch City Council
Plan Change 14
Kāinga Ora Submission
 City Centre

834



- Kāinga Ora Proposed HVC**
- Height Variation Control - 36m
- Kāinga Ora Proposed Zoning**
- Metropolitan Centre Zone
 - High density residential zone
 - Medium density residential zone
- PC14 Zoning**
- Central City Mixed Use Zone
 - Central City Mixed Use Zone (South Frame)
 - City centre zone
 - High density residential zone
 - Large format retail zone
 - Local centre zone
 - Medium density residential zone
 - Mixed use zone
 - Neighbourhood centre zone
 - Town centre zone
 - Transport
 - Specific Purpose
 - Industrial General
 - Industrial Heavy
 - Residential Guest Accommodation
 - Residential Medium Density
 - Residential Suburban
 - Residential Suburban Density Transition
 - Open Space Community Parks
 - Open Space Metropolitan Facilities
 - Open Space Water and Margins
 - Commercial Office
 - Avon River Precinct (Te Papa Otakaro)
 - Commercial Retail Park
- Precinct**
- Art Centre Height Precinct
 - Cathedral Square and Victoria Street Precinct
 - New Regent Street Height Precinct

This map contains data derived in part or wholly from sources other than Kāinga Ora, and therefore, no representations or warranties are made by Kāinga Ora as to the accuracy or completeness of this information. Contains information sourced from Hastings District Council, Hawke Bay Regional Council, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS. Map intended for distribution as an A3 PDF document.



Revision	1.0
Status	FINAL
Author	JH
Verifier	LB
Date	12/05/2023

Project	Christchurch City Council PC14 Submissions
Client	Kāinga Ora
Discipline	GIS
Drawing No.	GIS-7774461-CCPC14-02

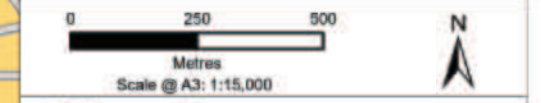


Path: P:\7774461-11-WIP\WG-GIS\Christchurch\NPSUD\01-Map\GIS-7774461-ChristchurchNPSUD.aprx Author: JH

Christchurch City Council Plan Change 14 Kāinga Ora Submission Papanui & Merivale

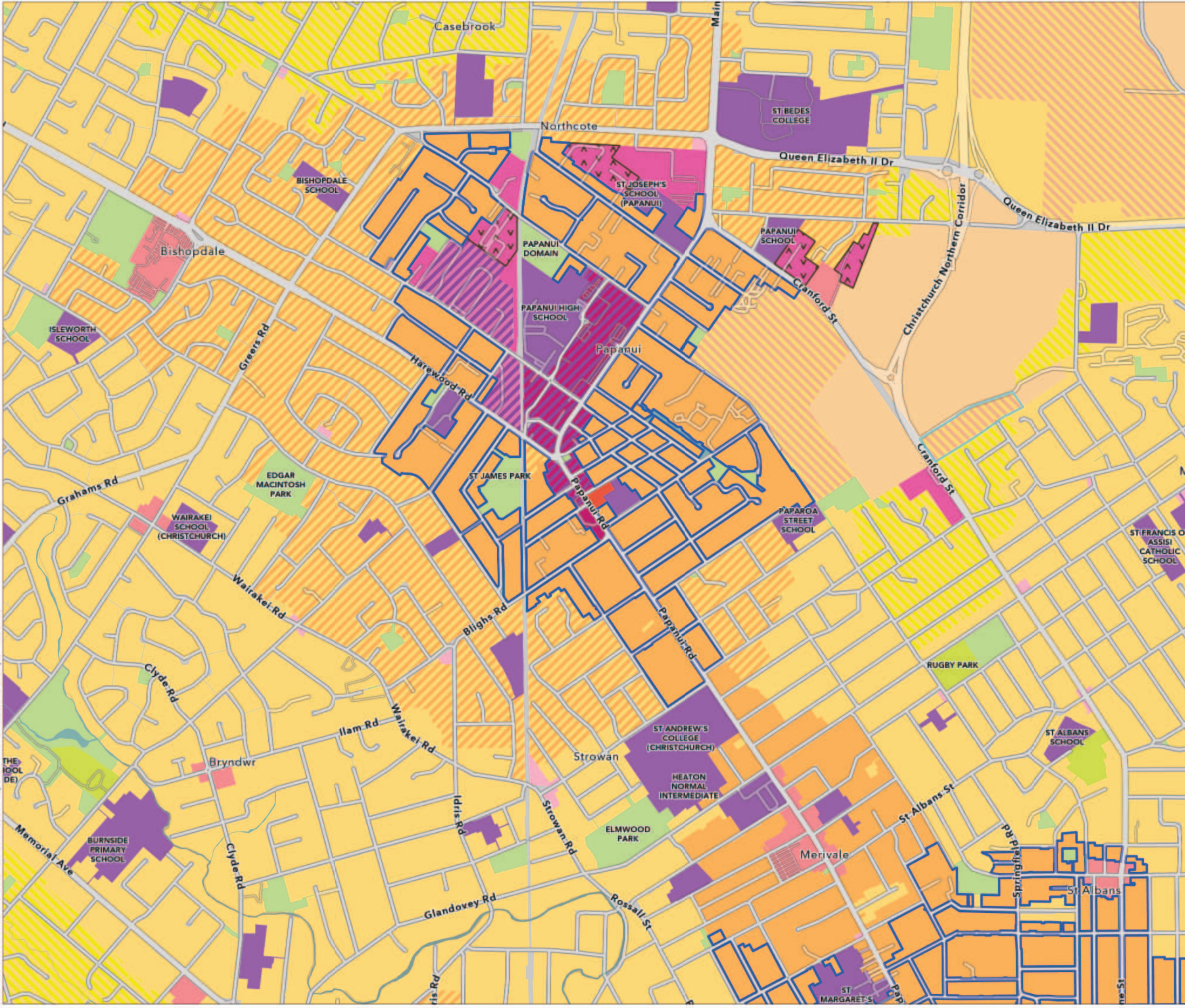
- Kāinga Ora Proposed HVC**
 [Blue outline] Height Variation Control - 36m
- Kāinga Ora Proposed Zoning**
 [Purple hatched] Metropolitan Centre Zone
 [Orange hatched] High density residential zone
 [Yellow hatched] Medium density residential zone
- PC14 Zoning**
 [Light orange] Future Urban Zone
 [Orange] High density residential zone
 [Pink] Large format retail zone
 [Red] Local centre zone
 [Yellow] Medium density residential zone
 [Light pink] Neighbourhood centre zone
 [Dark pink] Town centre zone
 [Grey] Transport
 [Purple] Specific Purpose
 [Magenta] Industrial General
 [Light orange] Rural Urban Fringe
 [Red] Residential Guest Accommodation
 [Light yellow] Residential Medium Density
 [Yellow] Residential Suburban
 [Orange] Residential Suburban Density Transition
 [Light green] Open Space Community Parks
 [Green] Open Space Metropolitan Facilities
 [Dark green] Open Space Natural
 [Teal] Open Space Water and Margins
 [Light yellow] Residential New Neighbourhood
- Precinct**
 [Black outline] Brownfield Precinct

This map contains data derived in part or wholly from sources other than Kāinga Ora, and therefore, no representations or warranties are made by Kāinga Ora as to the accuracy or completeness of this information. Contains information sourced from Hastings District Council, Hawke Bay Regional Council, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS. Map intended for distribution as an A3 PDF document.



Revision	1.0
Status	FINAL
Author	JH
Verifier	LB
Date	12/05/2023

Project	Christchurch City Council PC14 Submissions
Client	Kāinga Ora
Discipline	GIS
Drawing No.	GIS-7774461-CCPC14-01



Path: P:\7774461-11-WIP\WG-GIS\Christchurch\NPSUD\01-Map\GIS-7774461-ChristchurchNPSUD.aprx Author: JH



12th May 2023

Attn: Mark Stevenson
Planning Manager
Christchurch City Council
Po Box 73016
Christchurch

Submission lodged via email: engagement@ccc.govt.nz

**KĀINGA ORA – HOMES AND COMMUNITIES SUBMISSION ON A NOTIFIED
PROPOSAL FOR PLAN CHANGE 13 UNDER CLAUSE 6 OF SCHEDULE 1 OF THE
RESOURCE MANAGEMENT ACT 1991**

This is a submission on Plan Change 13 – Heritage (“PC13”) from Christchurch City Council (“the Council”) on the Operative Christchurch District Plan (“the Plan”).

Kāinga Ora does not consider it can gain an advantage in trade competition through this submission. In any event, Kāinga Ora is directly affected by an effect of the subject matter of the submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

The specific provisions of the proposal that this submission relates to:

The proposed Residential Heritage Area provisions in their entirety.

The Kāinga Ora submission is:

1. Kāinga Ora Homes and Communities (“**Kāinga Ora**”) is a Crown Entity and is required to give effect to Government policies. Kāinga Ora has a statutory objective that requires it to contribute to sustainable, inclusive, and thriving communities that:

- a) Provide people with good quality, affordable housing choices that meet diverse needs; and
 - b) Support good access to jobs, amenities and services; and
 - c) Otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
2. Because of these statutory objectives, Kāinga Ora has interests beyond its role as a public housing provider. This includes a role as a landowner and developer of residential housing and as an enabler of quality urban developments through increasing the availability of build-ready land across Christchurch City.
3. Kāinga Ora therefore has an interest in PC13 and how it:
- (a) Gives effect to the National Policy Statement on Urban Development (“**NPS-UD**”) and The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (“**the Housing Supply Act**”);
 - (b) Minimises barriers that constrain the ability to deliver housing development across public housing, affordable housing, affordable rental, and market housing; and
 - (c) Provides for the provision of services and infrastructure and how this may impact on the existing and planned communities, including Kāinga Ora housing developments.
4. By way of review, Kāinga Ora considers that having some of the Residential Heritage Area provisions being contained in PC14 and following an IPI process i.e. the built form standards, and other Heritage Area provisions being progressed through a separate PC13, and following a first schedule process i.e. Heritage Area policies has created efficiency issues. The Kāinga Ora submission on Residential Heritage Areas as part of PC13 therefore needs to be read together with our separate submission on PC14.
5. The Kāinga Ora submission supports the following parts of PC13:
- a) The management of historic heritage and the use of qualifying matters for individually listed heritage items, including the identified sites of historic heritage items and their settings (City Centre Zone) – noting that historic heritage is a matter of national significance in Section 6.
6. The Kāinga Ora submission opposes in part PC13 for the following reasons:

- a) Kāinga Ora generally supports the protection of areas of historic heritage where the requirements of Section 6 of the Resource Management Act 1991 ('RMA' or 'the Act') are met. However, Kāinga Ora opposes the proposed Residential Heritage Areas ('RHAs') and the Residential Heritage Area Interface overlay ('RHAIO') that are sought to be introduced under PC13 in their entirety. Kāinga Ora does not consider that the proposed RHAs and RHAIOs meet the requirements of Section 6 of RMA to the extent that they should be accorded 'historic heritage' status of 'national' significance.
- b) Kāinga Ora seeks the deletion of any proposals in PC14 that seek amendments as matters pertain to RHAs and RHAIOs, consistent with the relief sought in this PC13 submission. Kāinga Ora considers that the proposed changes across PC13 and PC14 are not qualifying matters, as the assessments in its view, do not meet the requirements under s6, s77I, s77J, s77K, and/or s77L of the RMA.
- c) The RHAs and RHAIOs lack a strong evidence basis and fail to consider unimplemented resource consents.
- d) Kāinga Ora also opposes the proposed RHAs and RHAIOs as being a qualifying matter as proposed in PC14 as we consider the Council has sought to elevate (conflate) special character as historic heritage. Kāinga Ora, therefore oppose the PC13 provisions, contained in section 9.3.6.4 and the associated Schedule B in 9.3.7.3.
- e) Kāinga Ora has particular concern regarding the assessment of areas with a high proportion of Kāinga Ora housing, such as the proposed Piko/Shands character and heritage areas. For example, the benefits of providing a greater number of houses for the most vulnerable members of society, particularly in an area that has historically been used for social housing, are greater than retaining the character associated with existing housing. Consideration should be given if protection does sufficiently outweigh the social cost of the provision warm, dry and safe housing. We do not believe this test has been met.
- f) While State Housing delivery throughout the first Labour Government period is a feature of New Zealand's past, the very nature of state 'public housing' was and remains at its core, to provide housing for those in need. Much of the existing housing stock throughout Christchurch is nearing the end of its serviceable life and located on low-density residential zoned land which does not reflect the significant increase

in New Zealand's population since their original construction, and the relative increase and demand for public housing in the current environment. Securing such areas or groupings of houses (and in some instances identification as 'built heritage') effectively-ascribes heritage value to past urban development patterns that are demonstrably not an efficient use of land, and present a significant loss of opportunity cost for public housing delivery – particularly where the Medium Density Residential Standards ('MDRS') or High Density Residential Zoning ('HDZ') would enable an uplift in housing intensity as a permitted activity.

- g) Kāinga Ora consider that the assessments supporting the identification of RHAs and RHAIOs predominantly focus on physical built form, and do not have sufficient consideration of historical values associated with the place.
- h) Kāinga Ora also oppose the proposed provisions controlling new buildings on sites sharing a boundary with a Residential Heritage Area (Residential Heritage Area Interface). The introduction of this interface further blurs the distinction between s6 RMA matters. These controls are similarly not a universally accepted approach to the management and protection of heritage values, and Kāinga Ora does not support this use.
- i) Kāinga Ora considers that qualifying matters need to be expressed more clearly across PC13 and PC14 to assist with plan administration and interpretation. For example, having some of the Heritage Area provisions being contained in PC14 and following an IPI process i.e. the built form standards, and other Heritage Area provisions being progressed through a separate PC13, and following a first schedule process i.e. Heritage Area policies has created efficiency issues.
- j) Kāinga Ora submits that changes to policies, rules and matters of discretion are necessary to better reflect the requirements and intent of the 'the Housing Supply Act' and NPS-UD. Kāinga Ora considers that PC 13 and PC14 are not currently appropriately framed to recognise that as the character of planned urban areas evolves to deliver a more intensive and compact urban form, amenity values will change. Amendments are sought through both this submission and the submission on PC14 to ensure this is reflected more consistently throughout the provisions, in language that is consistent with the NPS-UD.
- k) The submission seeks such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission above.

7. The changes requested are made to:
- a) Ensure that Kāinga Ora can carry out its statutory obligations;
 - b) Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991;
 - c) Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development;
 - d) Provide clarity for all plan users; and
 - e) Allow Kāinga Ora to fulfil its urban development functions as required under the Kāinga Ora–Homes and Communities Act 2019.

Kāinga Ora seeks the following decision from Christchurch City Council:

That the specific amendments, additions or retentions which are sought as specifically outlined in this submission letter, are accepted and adopted into PC13 and PC14. Including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Kāinga Ora wishes to be heard in support of their submission.

Kāinga Ora seeks to work collaboratively with the Council and wishes to discuss its submission on PC13 to address the matters raised in its submission.



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Brendon Liggett
Development Planning Manager
Kāinga Ora – Homes and Communities

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12th May 2023

Attn: Mark Stevenson
Planning Manager
Christchurch City Council
Po Box 73016
Christchurch

Submission lodged via email: engagement@ccc.govt.nz

**KĀINGA ORA – HOMES AND COMMUNITIES SUBMISSION ON A NOTIFIED
PROPOSAL FOR PLAN CHANGE 14 UNDER CLAUSE 6 OF SCHEDULE 1 OF THE
RESOURCE MANAGEMENT ACT 1991**

This is a submission on Plan Change 14 – Housing and Business Choice (“PC14”) from Christchurch City Council (“the Council” on the Operative Christchurch District Plan (“the Plan”).

Kāinga Ora does not consider it can gain an advantage in trade competition through this submission. In any event, Kāinga Ora is directly affected by an effect of the subject matter of the submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

The specific provisions of the proposal that this submission relates to:

PC14 in its entirety.

This document and the appendices attached is Kāinga Ora submission on PC14.

The Kāinga Ora submission is:

1. Kāinga Ora Homes and Communities (“Kāinga Ora”) is a Crown Entity and is required to give effect to Government policies. Kāinga Ora has a statutory objective that requires it to contribute to sustainable, inclusive, and thriving communities that:
 - a) Provide people with good quality, affordable housing choices that meet diverse needs; and
 - b) Support good access to jobs, amenities and services; and
 - c) Otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.

2. Because of these statutory objectives, Kāinga Ora has interests beyond its role as a public housing provider. This includes a role as a landowner and developer of residential housing and as an enabler of quality urban developments through increasing the availability of build-ready land across the Canterbury Region, including Christchurch City.

3. Kāinga Ora therefore has an interest in both PC13 and PC14 and how they:
 - a) Gives effect to the National Policy Statement on Urban Development (“**NPS-UD**”) and The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (“**the Housing Supply Act**”);
 - b) Minimises barriers that constrain the ability to deliver housing development across public housing, affordable housing, affordable rental, and market housing; and
 - c) Provides for the provision of services and infrastructure and how this may impact on the existing and planned communities, including Kāinga Ora housing developments.

4. Kāinga Ora supports the general direction and intent of Plan Change 14, especially to the extent that this suite of plan changes is more enabling of residential and business development capacity compared to the Christchurch City Council Operative District Plan.

In particular, Kāinga Ora supports:

- a) The recognition of the need for well-functioning urban environments (consistent with the direction set out in the National Policy Statement on Urban Development 2020 (“**NPS-UD**”));
 - b) The provision of medium density housing in most existing residential areas across the city, which is consistent with the requirements of the Resource Management (Enabling Housing Supply) Amendment Act 2021 (“**the Amendment Act**”);
 - c) The recognition of the need to provide sufficient development capacity to meet long term demands for housing and business land;
 - d) The need to manage significant risks from natural hazards;
 - e) The promotion of a compact urban form and residential intensification in Christchurch City;
 - f) The provision for enabling medium to high density residential development within a walkable catchment of the City Centre and larger Commercial Centres; and
 - g) The provision of a range of commercial and mixed-use environments which will provide for and support urban development across Christchurch City.
5. The Kāinga Ora submission seeks amendments to PC14 in the following topic areas:

Qualifying Matters

- a) Kāinga Ora could support the qualifying matters, subject to amendments and clarifications as sought in the submission with the exception of: Low Public Transport Accessibility, Key Transport Corridors, Sunlight Access, Residential Heritage Areas, Character Areas, the Christchurch International Airport Noise Influence Area, Industrial Interfaces, and Open Space Areas which are opposed in full by Kāinga Ora for the reasons included in **Appendix 1**.
- b) Kāinga Ora considers that qualifying matters need to be expressed more clearly across PC13 and PC14 to assist with plan administration and interpretation. For example, having some of the Heritage Area provisions being contained in PC14 and following an IPI process i.e. the built form standards. Whilst other Heritage Area provisions are being progressed through a separate PC13, and following a first schedule process i.e. Heritage Area policies has created efficiency issues.

- c) Kāinga Ora opposes the proposed introduction of certain new qualifying matters through the IPI process because doing so in this instance (having regard to the nature of the particular qualifying matters concerned) goes beyond the scope of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. The concerns about the use of the IPI process for this purpose was highlighted in the recent Environment Court's decision of *Waikanae Land Company Limited v Heritage New Zealand Pouhere Tāonga [2023] NZEnvC 056*. As noted in that case, if a Council wishes to implement other changes to its district plan, then there is the usual First Schedule process that can be adopted, with that process containing the appropriate safeguard of a full appeal to the Environment Court.

Residential Heights

- d) Kāinga Ora supports the application of a Medium Density Residential Zone (MRZ) across all relevant residential zones. It also supports the introduction of High Density Residential Zone (HRZ) around the edge of the City Centre and where located in close proximity to larger commercial centres. The extent of HRZ is sought to be increased in the Riccarton area given the scale of the Riccarton commercial centre and proximity to the University of Canterbury activity hub. In addition to the increased spatial extent of HRZ being sought, Kāinga Ora submits that the heights and centre hierarchy be simplified, with greater enablement of taller buildings provided.
- e) Further to this, Kāinga Ora seeks that a Height Variation Control overlay of 36m be applied 1.20km from the edge of the City Centre Zone and the three Metropolitan Centre Zones as sought below.

Metropolitan Centre Zoning

- f) Kāinga Ora seeks the introduction of a new 'Metropolitan Centre Zone (MCZ) in the Plan to replace the Riccarton, Papanui, and Hornby Town Centre Zones to recognise the broader catchment these centres serve, both currently and to account for future growth of the residential catchment. The existing size, scale and function of these centres are such that they merit the application of a MCZ classification, with appropriate objectives, policies and rules framework. A MCZ chapter is sought and is attached in **Appendix 2**. Further, recent and proposed investment in public and active transport modes along the corridors in which these activity centres are located, support the case for a zoning classification reflective of their relative position within the centres hierarchy.

Industrial Interface, Industrial General, and Commercial Mixed Use proposals

- g) Kāinga Ora submits that the Industrial Interfaces qualifying matter and associated policies, and rules are deleted, and that the purported effects are managed, where necessary through noise controls and acoustic and ventilation requirements as opposed to the proposed density controls.
- h) In reviewing the locations that the Industrial Interface qualifying matter applies in the preparation of this submission, Kāinga Ora notes that the current function of many industrial general zone areas, that are located in primarily residential areas, would no longer meet a definition of 'industrial activity'. Kāinga Ora question if this zoning may no longer be appropriate for these locations and if an application of a commercial mixed use zone may be more appropriate; as has been proposed in PC14 for Sydenham.
- i) Similarly, in relation to the rules that have been proposed in commercial mixed use zone boundary changes in areas adjacent to the central city i.e. Sydenham and Phillipstown, Kāinga Ora express concern that the approach taken will not achieve the outcomes sought. Kāinga Ora proposes that the existing zoning remains and a schedule 1 process is followed, including structure planning and use of appropriate planning methods. This may also provide the Council with opportunities to support these changes through the Long Term Plan.

General Feedback

- j) Kāinga Ora submits that changes to policies, rules and matters of discretion are necessary to better reflect the requirements and intent of the 'the Housing Supply Act' and NPS-UD. Kāinga Ora considers that PC14 is not currently appropriately framed to recognise that as the character of planned urban areas evolves to deliver a more intensive and compact urban form, amenity values will change. Amendments are sought to ensure this is reflected more consistently throughout the provisions, in language that is consistent with the NPS-UD.
- k) The Kāinga Ora submission seeks changes to rules to address errors, to align with Schedule 3A of the Housing Supply Act, or to reduce duplication where the standards introduced via Schedule 3A overlap with District Plan provisions that are not proposed to be deleted.

- l) The Kāinga Ora submission seeks amendments to objectives, policies, rules and matters for discretion / assessment criteria - for improved clarity, effectiveness and focus on the specific resource management issue / effect to be addressed. Further, The scope and extent of assessment matters provide such broad discretion that they undermine the 'Housing Supply Act's' intent of a restricted discretionary activity status.
 - m) The submission seeks such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission above and in **Appendix 1**.
6. The changes requested are made to:
- a) Ensure that Kāinga Ora can carry out its statutory obligations;
 - b) Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991;
 - c) Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development;
 - d) Provide clarity for all plan users; and
 - e) Allow Kāinga Ora to fulfil its urban development functions as required under the Kāinga Ora–Homes and Communities Act 2019.
7. The Kāinga Ora submission points and changes sought can be found within Table 1 of Appendix 1 which forms the bulk of the submission.
8. A Metropolitan Centre Zone chapter is sought and included in **Appendix 2**.
9. Mapping changes sought are included in **Appendix 3**.

Kāinga Ora seeks the following decision from Christchurch City Council:

That the specific amendments, additions or retentions which are sought as specifically outlined in this letter and **Appendix 1-3**, are accepted and adopted into PC14, including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Kāinga Ora wishes to be heard in support of their submission.

Kāinga Ora seeks to work collaboratively with the Council and wishes to discuss its

submission on PC14 to address the matters raised in its submission.

A handwritten signature in black ink, appearing to be 'BL', written over a horizontal dotted line.

Brendon Liggett

Development Planning Manager

Kāinga Ora – Homes and Communities

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Appendix 1: Decisions sought on PC14

The following table sets out the amendments sought to the PC14 and also identifies those provisions that Kāinga Ora supports.

*Proposed changes are shown as **strikethrough** for deletion and **underlined** for proposed additional text.*

Table 1

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
Zone Boundaries/ Mapping					
1.		Planning maps	Support in Part	<p>Kāinga Ora support the implementation of a Medium Density Residential Zone (MRZ) over all relevant residential zones. As set out in this submission, Kāinga Ora oppose the Public Transport Accessibility Qualifying Matter (QM) and the Airport Noise Influence Area QM and therefore seek as a consequence of deleting these QMs that the RS and RSDT zoned areas within these QMs be rezoned to MRZ.</p> <p>Kāinga Ora note some ambiguity in the provisions as to whether the land that is subject to the Tsunami Risk QM is intended to be zoned MRZ or RS/ RSDT. Whilst agreeing that a high risk of natural hazards is a legitimate QM, our</p>	<ol style="list-style-type: none"> 1. Retain MRZ over areas where MRZ is proposed in PC14 as notified unless otherwise changed by this submission. 2. Rezone to MRZ areas that are proposed as RS/ RSDT zones under the Public Transport Accessibility and Airport Noise Influence Area QMs. 3. Rezone Lyttelton to MRZ. 4. Rezone Papanui, Riccarton and Hornby Key Activity Centres to Metropolitan Centre Zone (MCZ) from Town Centre Zone and Large Format Retail Zone. 5. Rezone to HRZ areas that are proposed as MRZ within a Local Centre Intensification Precinct and remove the precinct. 6. Retain HRZ over areas where HRZ is proposed in PC14 as notified unless otherwise changed by this submission.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>submission raises concerns with whether the costs and benefits of this QM strike an appropriate balance, and question the appropriateness of using a threshold of a 1:500 year event plus a 1m rise in sea levels as the mapping base. Use of a lower density RS/ RSDT zoning should only be used where the risk of hazards is proven to be high and with a high return period.</p> <p>The areas subject to the 'Local Centre Intensification Precinct' are sought to be rezoned from MRZ to HRZ and the precinct overlay deleted. These areas are ideally located adjacent to medium-sized commercial centres that provide residential activities with easy access to a wide range of services and are also generally well serviced by public transport. As such, a HRZ is considered to be more appropriate and better aligned</p>	<p>7. Remove the Large Local Centre Intensification Precinct and replace with HDZ.</p> <p>8. Extend the boundary of HRZ in the Riccarton area as shown in the maps attached to this submission in Appendix 3.</p> <p>9. Delete the various height/intensification precincts and replace with a single 'Height Variation Control' precinct to reflect the 36m height limit sought in the submission for the HRZ adjacent to the City Centre, Hornby, Riccarton, and Papanui centres as shown in the maps attached to this submission within Appendix 3.</p> <p>Generally these are:</p> <ul style="list-style-type: none"> - 22m HDZ 1.20km from the edge of the new MCZ and the CCZ. - 36m Height Variation Overlay 400m from the edge of the new MCZ and CCZ.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>with NPS-UD and National Planning Standard outcomes.</p> <p>Kāinga Ora submits that Metropolitan Centres be employed within the centres hierarchy. Kāinga Ora seeks that this covers the existing key activity areas for Riccarton, Papanui, and Hornby.</p> <p>Kāinga Ora support the inclusion of a HRZ in appropriate locations close to the City Centre, Metropolitan and larger suburban commercial centres. The zone boundaries for the HRZ is supported, with the only exception being in the Riccarton area where an extension of the HRZ boundaries are sought to better recognise the proximity of this area to a wide range of commercial services, university activity node, high frequency public transport, cycle ways, and the relief sought in the submission opposing the</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Riccarton Bush, Industrial Interface, Airport Influence Density Precinct, and Piko/Shands heritage area and character area QMs. Noting also the recommendation that Kāinga Ora has suggested in relation to amendments to the Industrial General Zoning at 247 Riccarton Road and 37 Euston Street.</p> <p>Kāinga Ora seeks to rationalise and simplify the height limits applicable to the HRZ, depending on the size of the adjacent commercial centre. Consequential amendments are therefore required to the various height/ intensification precincts to reflect the outcomes sought in the submission.</p>	
Chapter 3 - Strategic Directions					

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
2.	3.3	Objective 3.3.3 – Ngāi Tahu mana whenua	Support in Part	<p>The proposed amendment to clause (a)(ii) is supported.</p> <p>This objective is sought to also include explicit reference to enabling the ability of mana whenua to establish Papakāinga/Kāinga Nohoanga as an important tool in meeting their well-being and prosperity as sought in the amendment.</p>	<p>1. Amend clause (a)(ii) as follows:</p> <p>Ngāi Tahu mana whenua's aspirations to actively participate priorities for their well-being and prosperity are recognised and provided for in the revitalisation of Ōtautahi, including the provision of Papakāinga/Kāinga Nohoanga are recognised; and</p>
3.	3.3	Objective 3.3.4 – Housing bottom lines and choice	Support	Support the proposed reference to Papakāinga/Kāinga Nohoanga as a new clause (b)(ii).	Retain clause (b)(ii) as notified.
4.	3.3	Objective 3.3.7 – Well functioning urban environment	Support in Part	<p>Clause (a) implements legislative requirements and is supported. The balance of the objective is likewise supported, with the exception of clause (a)(i)(A) which confuses urban form with landscape outcomes and adds little meaningful value to the objective.</p> <p>Clause (a)(E)(iii) relating to mana whenua must include</p>	<p>2. Retain the objective as notified, except for:</p> <p>Delete clause (a)(i)(A) Contrasting building clusters within the cityscape and the wider perspective of the Te Poho-o-Tamatea/the Port Hills and Canterbury plains; and</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>explicit reference to Papakāinga/Kāinga Nohoanga.</p> <p>It is noted that the clause numbering/ formatting is unclear.</p>	<p>Amend clause (a)(E)(iii) as follows:</p> <ol style="list-style-type: none"> The cultural traditions and norms of Ngāi Tahu mana whenua, <u>including the provision of Papakāinga/Kāinga Nohoanga</u> Update clause numbering.
5.	3.3	Objective 3.3.8 – Urban growth, form and design	Support in Part	<p>In line with our submission raising concerns that the proposed character area QM does not meet s32 requirements, in the event that the character area provisions are deleted, then existing clause (a)(ii) is also sought to be deleted.</p> <p>Similarly in line with our submission raising consistency of heights in local centres, and in line with concerns of the public transport access qualifying matter clause (a)(iv.)(A) is sought to be amended. The other amendments sought in PC14 to this objective are supported.</p>	<ol style="list-style-type: none"> Retain objective as notified, except for the deletion of existing clause (a)(ii): <u>Has its areas of special character and amenity value identified and their specifically recognised values appropriately managed; and</u> Amend clause (a)(iv.)(A) as follows: <u>in and around the Central City, Key Activity Centres (as identified in the Canterbury Regional Policy Statement), Town Centre, and larger Local neighbourhood</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<u>centres, and nodes of core public transport routes; and</u>
6.	3.3	Objective 3.3.10 – Natural and cultural environment	Oppose	In line with our submission seeking the deletion of the tree canopy financial contribution rules, the related proposed reference to tree canopy in the strategic objectives is also opposed.	Delete proposed clause (a)(ii)(E): Tree canopy cover in areas of residential activity that maintains and enhances the city's biodiversity and amenity, sequesters carbon, reduces stormwater runoff, and mitigates heat island effects; and
7.	3.3	Objective 3.3.13 - Infrastructure	Oppose	In line with our submission seeking the deletion of the Airport Influence Density Precinct and our concern that the Qualifying Matter does not meet s32 requirements, amend Clause (b).(iii.)	Delete clause (b).(iii.).
Chapter 6 – Qualifying Matters					
8.	Sites of Ecological Significance	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards	Support	Kāinga Ora support the Sites of Ecological Significance, the Outstanding and Significant Natural Features, and the Sites of Cultural Significance qualifying matters, noting these	<ol style="list-style-type: none"> 1. Retain the Sites of Ecological Significance qualifying matter. 2. Retain the Outstanding and Significant Natural Features qualifying matter.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	<ul style="list-style-type: none"> Outstanding Natural Features and Landscapes Sites of Cultural Significance (Wāhi Tapu / Wāhi Taonga, Ngā Tūranga Tūpuna, Ngā Wai and Belfast Silent File) 	<p>and/or intensification enabled under Policy 3.</p> <p>9.1.4.1.1 P1 Indigenous vegetation clearance.</p> <p>9.1.4.1.3 RD3 – RD6 Indigenous vegetation clearance.</p> <p>9.1.4.1.5 NC1 and NC3 Indigenous vegetation clearance.</p> <p>8.5.1.3 RD11 Subdivision of land.</p> <p>8.9.2.3 RD5 Earthworks.</p> <p>9.2.4.1 Table 1(a) – (d), (i), (o) – (s) Outstanding natural features and landscapes.</p> <p>9.5.4.1.3 RD3 – RD6 Wāhi Tapu / Wāhi Taonga.</p>		<p>are all relevant matters of national significance in Section 6.</p> <p>It is also noted that there is very little overlap between Sites of Ecological Significance and Outstanding Natural Features and Landscapes with existing residential zones.</p>	<p>3. Retain the Sites of Cultural Significance qualifying matter.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		8.5.1.3 RD11 Subdivision of land. 8.9.2.3 RD5 Earthworks.			
9.	Slope Hazard Areas	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3. 5.6.1 Slope Instability Management Area	Support	Kāinga Ora support the management of significant risks from natural hazards as a qualifying matter (in appropriate circumstances), noting that it is a matter of national significance in Section 6. As slope hazards are less dynamic and have greater certainty as to their risk over time than flooding (submitted on below) and are not subject to constant change through hazard mitigation works, Kāinga Ora supports the Slope Hazard Areas qualifying matter.	Retain the Slope Hazard Areas qualifying matter.
10.	High Flood Hazard Management Area	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards	Support in Part	Kāinga Ora supports a risk-based approach to the management of natural hazards, however, opposes the inclusion of further hazard	1. Amend the provisions to remove / delete the mapped Hazard Management Areas from within the District Plan and instead hold this information in non-statutory GIS maps.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	<p>Coastal Hazard Management Areas</p> <p>Tsunami Management Area</p>	<p>and/or intensification enabled under Policy 3.</p> <p>5.4.5 Flood Ponding Management Areas</p> <p>5.4.6 High Flood Hazard Management Areas</p> <p>5.2.2.5.1 Managing development in Qualifying Matter Coastal Hazard Management Areas 5.4A.1 – 5.4A.6 Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area.</p> <p>5.2.2.5.2 Managing development within the Qualifying Matter Tsunami Management Area</p> <p>5.4A.1 – 5.4A.6 Rules – Qualifying Matter Coastal Hazard Management Areas</p>		<p>areas within the maps as part of the District Plan.</p> <p>Including Flood Hazard Areas in the District Plan ignores the dynamic nature of such hazards. Kāinga Ora accepts that it is appropriate to include rules in relation to these hazards but seeks that the rules are not linked to static maps.</p> <p>Other councils across the country adopt a set of non-statutory hazard overlay maps which operate as interactive maps on the respective Council's 'Geo Maps' website – a separate mapping viewer to the statutory maps. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 process under the RMA. Kāinga Ora notes that there is no formal requirement for hazard</p>	<ol style="list-style-type: none"> 2. Reduce the Tsunami Management Area to a 1:100 year hazard. 3. Amend and make consequential changes to give effect to this submission.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		and Qualifying Matter Tsunami Management Area		<p>maps to be included within a district plan.</p> <p>Kāinga Ora also has concerns that the proposed policy approach relating to the Tsunami Management Area is too conservative, noting that Policy 24 of the NZCPS requires identification of areas in the coastal environment that are potentially affected by coastal hazards (including tsunami) over at least 100 years.</p> <p>Kāinga Ora also considers that the Council's intent to retain Residential Suburban / Residential Suburban Density Transition zoning in the Tsunami Management Area is disproportionate based on the modelled return period.</p>	
11.	Historic Heritage, Residential Heritage Areas, and Residential	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium	Support Historic Heritage.	Kāinga Ora generally supports the protection of areas of historic heritage where the requirements of Section 6 of the Resource Management Act	Delete the Residential Heritage Area qualifying matter and all proposed provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	Heritage Area Interface.	Density Residential Standards and/or intensification enabled under Policy 3. 14.5.3.2.3 Building height - Residential Heritage Areas. 14.5.3.2.7 Number of Residential Units Per Site - Residential Heritage Areas. 14.5.3.2.8b, 8c Setbacks - Residential Heritage Areas. 14.5.3.2.9 Building Coverage - Residential Heritage Areas. 14.5.3.2.10c Outdoor living space - Residential Heritage Areas.	Oppose Residential Heritage Areas.	<p>1991 ('RMA' or 'the Act') are met. However, Kāinga Ora opposes the new proposed Heritage Areas ('HAs') that are sought to be introduced under PC13 and PC14 in their entirety.</p> <p>Kāinga Ora does not consider that the proposed HAs meet the requirements of Section 6 of RMA to the extent that they should be accorded 'historic heritage' status of 'national' significance.</p> <p>Therefore, if these areas are considered to manage character (s7 RMA), rather than protect heritage, Kāinga Ora considers that a more nuanced assessment of costs and benefits applies to areas with a high proportion of Kāinga Ora housing, such as the proposed Piko/Shands character and heritage areas (i.e. the benefits of providing a greater number of houses for the most vulnerable members of society,</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>particularly in an area that has historically been used for social housing, are greater than retaining the character associated with existing housing per se, and therefore the character or heritage values of such locations must be carefully weighed to test the heritage values are existent and sufficiently so that they outweigh the social costs of lost development opportunity. We do not believe this test has been met.</p> <p>A more nuanced assessment of costs and benefits is likewise required for heritage areas in locations that are otherwise ideally located for further intensification, such as the heritage areas within and adjacent to the central city/ Four Avenues. Piko/ Shands is located in close proximity to both Riccarton and Church Corner commercial centres as well as an emerging high frequency public transport</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>corridor along Riccarton Road and a new major cycle way network. Were it not for the heritage and character area overlays, the Piko/ Shands area would merit a High Density zoning/ height limits.</p> <p>The imposition (costs) of character controls in locations that would otherwise suit high density housing must therefore be greater than the costs applying to character areas more generally. It follows that the benefits of such regulation and the identification of these areas as Qualifying Matters must therefore be greater than the benefits generally in order to justify additional regulation.</p> <p>It is further noted that having some of the Heritage Area provisions being contained in PC14 and following an IPI process i.e. the built form standards, and other Heritage Area provisions being progressed through a separate</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>PC13, and following a first schedule process i.e. Heritage Area policies has created efficiency issues.</p> <p>Consistency is sought with the Kāinga Ora submission on Plan Change 13 (“PC13”), which Kāinga Ora opposed the approach of establishing ‘Historic Heritage Areas’ in its entirety.</p> <p>Kāinga Ora is seeking the spatial application of residential zones to be applied across the City, regardless of the nature and extent of the current and proposed ‘Heritage Areas’ set out by Council in PC13. Kāinga Ora seeks the deletion of any proposed changes in PC14 that seek amendments to historic heritage and special character, consistent with the relief sought in PC13.</p> <p>Kāinga Ora considers that the proposed changes across PC13 and PC14 are not</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				qualifying matters, as the assessments in its view, do not meet the requirements under s6, s77I, s77J, s77K, and/or s77L of the RMA.	
12.	Significant and Other Trees (excluding those not identified as Qualifying Matters).	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>9.4.4.1.1 P1 – P12 Tree pruning, felling, earthworks.</p> <p>9.4.4.1.2 C1 Tree maintenance.</p> <p>9.4.4.1.3 RD1 – RD8 Tree pruning, felling, earthworks.</p> <p>9.4.4.1.4 D1 – D2 Tree pruning, felling 9.4.7.1 Appendix – Schedules of significant trees.</p>	Support in Part	<p>Kāinga Ora support the Significant and Other Trees qualifying matter.</p> <p>The rules in Chapter 9 of the District Plan sufficiently recognise and provide for the management of notable trees. Such rules provide a suitable framework for considering new buildings in proximity to notable trees, or their removal.</p> <p>Rule 9.4.4.1.1 P12 triggers the need for resource consent for earthworks within 5m of a street tree, however consent is always granted provided the works are undertaken by, or under the supervision of, a works arborist. The relief sought would reduce costs and the reliance on the resource consent process and is therefore more consistent</p>	<ol style="list-style-type: none"> 1. Retain Significant and Other Tree Qualifying Matter. 2. Amend Rule 9.4.4.1.1 P12 as follows: <p>Rule 9.4.4.1.1 P12 - Activities shall be undertaken by, or under the supervision of, a works arborist. employed or contracted by the Council or a network utility operator.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				with Objective 3.3.2.	
13.	Waterbody setbacks	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>6.6.4 City and Settlement Water Body Setbacks 6.6.4.1 – 6.6.4.4 Activities within water body setbacks</p>	Support in Part	<p>Section 6 seeks the preservation of rivers and their margins and their protection from inappropriate subdivision, use and development. Similarly, Section 6 also recognises and provides for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga.</p> <p>Kāinga Ora is supportive of these Section 6 matters being identified as a qualifying matter. However, where the identified waterbodies do not meet a Section 6 threshold, such as for 'Environmental Asset Waterways' and 'Network Waterways' use of waterway setbacks as a qualifying matter, Council needs to demonstrate why development that is otherwise permitted under</p>	Remove 'Environmental Asset Waterways' and 'Network Waterways' as qualifying matter, unless a site by site assessment has been undertaken that demonstrates why development that is otherwise permitted under MDRS is inappropriate.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>MDRS is inappropriate, for every specific waterway (and adjacent site) where a qualifying matter is proposed.</p> <p>The existing provisions in Chapter 6.6 of the District Plan are sufficient.</p>	
14.	Public Open Space areas; and Ōtākaro Avon River Corridor.	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>18.4 to 18.96.1A Qualifying matters</p> <p>13.14 Specific Purpose (Ōtākaro Avon River Corridor) Zone – All provisions, including Appendix 13.14.6.2 specifying alternative zone provisions applicable to privately owned properties within the zone</p>	Oppose	<p>Kāinga Ora considers this qualifying matter is unnecessary and seek that it is deleted.</p> <p>While the use of areas for open space purposes is identified as a qualifying matter under RMA s77O(f), the areas zoned Open Space are owned by CCC and many are administered under the Reserves Act 1977. Council ownership, and Open Space zoning, makes it unlikely that these areas will be developed for medium density housing and such development would also be contrary to the purposes for which these sites were reserved. Further, the Housing Supply Act only requires CCC</p>	Delete the Open Space (recreation zone) qualifying matter and any relevant provisions proposed in its entirety.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>15.4.3.2.1 Maximum building height;</p> <p>Appendix 15.15.1 Town Centre Zone (Belfast/Northwood) Outline Development Plan</p>		<p>to incorporate MDRS into every relevant residential zone (not Open Space Zone).</p> <p>The s77O(f) matter is noted as being relevant for other councils where their District Plan does not include an Open Space zone and instead reserves often have a residential zoning.</p> <p>As with the Open Space Zones, Kāinga Ora note that the Ōtākaro 'red zone' area has been subject to detailed place-based assessment, with large-scale residential development not anticipated in this area.</p>	
15.	Residential Character Areas	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.3.1.1 P4 Conversion to two residential units –</p>	Oppose in Part	<p>Kāinga Ora support, in principle, the management of character as a qualifying matter. However, Kāinga Ora does not consider appropriate justification has been provided for the proposed new or extended 'character areas' set out in PC13 and PC14 to demonstrate that they contain specific characteristics that</p>	<ol style="list-style-type: none"> 1. Delete all new or extended character areas as qualifying matters and undertake further analysis to determine the exact values of the resources that the Council seeks to manage in the District Plan. 2. For existing character areas retain the controlled activity status for new buildings that exists in the Operative Plan - Rule 14.5.3.1.2 C1.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>Character Area Overlays</p> <p>14.5.3.1.2 C1 Character Area Overlays – new residential units to rear</p> <p>14.5.3.1.3, RD6, RD14 Area-specific rules and character overlays.</p> <p>14.5.3.2.3 Building height – Character Area Overlays.</p> <p>14.5.3.2.5 – 14.5.3.2.14 Built form rules – Character Area Overlays.</p> <p>14.15.27 Matters of discretion - Character Area Overlays.</p> <p>14.8.1.1 P18 – Conversion to two residential units –Lyttelton Character Area.</p> <p>14.8.3.1.1 P5 – Minor residential unit in Lyttelton Character Area or Lyttelton Residential Heritage Area.</p>		<p>make the level of development provided by the MDRS or policy 3 inappropriate in the area. Further, they blur the line between the protection of historic heritage values as set out under s6(f) of the RMA, and amenity values as set out under section 7 of the RMA. This is especially the case where both character and heritage area overlays apply to the same geographic area.</p> <p>Kāinga Ora questions the planning method and assessment undertaken to determine the proposed provisions.</p> <p>Kāinga Ora considers that any such provisions and values identified should be ‘managed’ rather than ‘protected’ in the District Plan. Kāinga Ora seeks the provisions as proposed are deleted and that further analysis is undertaken to determine the exact values of the resources that the Council</p>	<p>14.5.3.2.3 Building height – Character Area Overlays, and</p> <p>14.5.3.2.5 – 14.5.3.2.14 Built form rules – Character Area Overlays.</p> <p>3. In the event that the Character Area qualifying matter remains, explicit provision is sought for the ability to develop Papakāinga/Kāinga Nohoanga, noting that local Rūnanga have purchased the former Lyttelton West School Site.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>14.8.3.1.2 C3 – New residential unit to rear Lyttelton Character Area.</p> <p>14.8.3.1.3 RD3 – Lyttelton Character Overlay – new buildings, alterations etc.</p> <p>14.8.3.1.3. RD5-RD7, RD9 – not meeting Lyttelton Character Area or Residential Heritage Area built form rules</p> <p>14.8.3.1.3 RD8, RD10 –not meeting Lyttelton Character Area built form rules.</p> <p>14.8.3.1.3 RD11 - Lyttelton Character Area or Lyttelton Residential Heritage Area – not meeting minor residential units rules.</p> <p>14.8.3.2.2 –14.8.3.2.6 Built form rules – Lyttelton Character Area or Lyttelton Residential Heritage Area.</p> <p>14.8.3.2.7 – 14.8.3.2.12 -Built form rules – Lyttelton Character Area only.</p>		<p>seeks to manage in the District Plan.</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
16.	Electricity Transmission Corridors.	<p>6.1A Qualifying matters.</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.4.1.5 NC6 – NC7 National Grid transmission and distribution lines.</p> <p>14.5.1.5 NC2 – NC3 National Grid transmission and distribution lines.</p> <p>14.7.1.5 NC2 National Grid transmission and distribution lines.</p> <p>14.12.1.5 NC1 – NC2 National Grid transmission and distribution lines.</p>	Support	Kāinga Ora support this qualifying matter noting that the qualifying matter only relates to the National Grid Transmission Lines (nationally significant infrastructure) in accordance with s771(e) and no other lesser category of line.	Retain Electricity Transmission Corridors qualifying matter only to the extent of the corridor as defined in the NES ET.
17.	Airport Noise Influence Area	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the</p>	Oppose in Part	Kāinga Ora seeks that the Airport Noise Influence Area qualifying matter be deleted thus allowing all existing	Delete this qualifying matter and all proposed provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>Safe or efficient operation of nationally significant infrastructure (Christchurch Airport)</p> <p>14.4.1 – 14.4.4, 14.13, 14.14 Low Density Residential Airport Influence Zone and Airport Influence Density Precinct.</p>		<p>residential zoned land within the Airport Noise Influence Area to be zoned Medium Density Residential as per the direction in the Act.</p> <p>While Kāinga Ora agrees that it is appropriate to protect strategic infrastructure (including Christchurch International Airport) from reverse sensitivity effects, it does not consider that restricting density under the Airport Noise Influence Area is necessary to avoid reverse sensitivity effects. Further, Kāinga Ora considers that the health, safety and amenity of existing and future residents living within the Airport Noise Influence Area would be appropriately maintained if the land was zoned Medium Density Residential. Any new buildings and additions to existing buildings located within the 55 dB Ldn air noise contour or the 55 dB Ldn engine testing contour would continue to be</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				subject to the acoustic insulation standards set out at Rule 6.1.7.2.2 (Activities near Christchurch Airport) in the District Plan as required by Policy 6.1.2.1.5 b. ii. (Airport noise).	
18.	Lyttelton Port Influence Overlay	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.8.3.1.1 – 14.8.3.1.5 Area-specific rules - Lyttelton Port Influences Overlay</p>	Support	<p>Kāinga Ora support the Lyttelton Port Influence Overlay qualifying matter noting that the qualifying matter only relates to nationally significant infrastructure in accordance with s771(e).</p> <p>Kāinga Ora does not oppose the noise insulation standards.</p> <p>Kāinga Ora notes that the geographic area covered by the Port Influence Overlay is small and overlaps with a proposed Heritage Area. Furthermore, the Port is obliged to pay for the acoustic insulation of existing dwellings within the contour (Rule 13.8.4.2.7), so the scale, plus the costs and benefits, are markedly different between the</p>	Retain Lyttelton Port qualifying matter.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Port Influence Overlay and the Airport Noise Influence Area qualifying matter.	
19.	NZ Rail Network Interface Sites.	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>6.1.7 Activities near infrastructure.</p> <p>14.4.1.3 RD28 and 14.4.2.7 Setback from rail corridor.</p> <p>14.5.1.3 RD12 and 14.5.2.7 Setback from rail corridor.</p> <p>14.8.1.3 RD16 and 14.8.2.4 Setback from rail corridor.</p>	Oppose	Kāinga Ora considers that the standard internal boundary setback for zones is appropriate.	Delete NZ Rail Network Interface Sites qualifying matter.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		14.12.1.3 RD13 and 14.12.2.5 Setback from rail corridor.			
20.	Radio Communication Pathways for the Justice and Emergency Services Precinct.	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3. 6.12 Radio communication Pathway Protection Corridors.	Neutral	Kāinga Ora recognise the need to maintain radio communication for emergency services, and does not provide any further feedback.	Note: Table 1 in Chapter 6.1A references an abbreviation rather than the qualifying matter rule reference.
21.	Vacuum Sewer Wastewater Constraint Areas	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3. 8.9A Waste water constraint areas	Support in Part	Kāinga Ora recognise the need to ensure sufficient infrastructure is available to service developments. The Restricted Discretionary Activity status and the relevant matters of discretion are generally considered appropriate, however an additional matter of discretion that provides a consenting pathway for intensification in	Amend as follows: The Council's discretion shall be limited to the following matters: <u>c. The ability to connect into any nearby non-vacuum wastewater system.</u> <u>d. The extent to which alternative waste water solutions are available that do not adversely affect the</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				these areas where infrastructure constraints can be addressed by alternative means is required.	<u>function of the Council's waste water systems.</u>
22.	Sunlight Access	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.2.6 – Height in relation to boundary,</p> <p>14.6.2.2 – Height in relation to Boundary, 14.15.2 – Diagram D.</p>	Oppose	Kāinga Ora oppose 'Sunlight Access' being a qualifying matter and considers this to be inconsistent with the requirements of Section 77L.	Delete the Sunlight Access qualifying matter and all associated provisions.
23.	Low Public Transport Accessibility.	<p>14.1 Introduction,</p> <p>14.2 Objectives and Policies, 14.3 How to interpret and apply the rules, 14.4 Rules - Residential Suburban Zone and Residential Suburban Density Transition Zone, 14.7</p>	Oppose	Kāinga Ora opposes the 'Low Public Transport Accessibility' being a qualifying matter and considers this to be inconsistent with the requirements of Section 77L.	<ol style="list-style-type: none"> 1. Delete the Low Public Transport Accessibility Qualifying Matter and all associated provisions. 2. Rezone all areas subject to this QM to MRZ.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>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.</p>		<p>Kāinga Ora is particularly concerned to note the large areas with inadequate services in the eastern parts of the District, where the lack of such services has the potential to exacerbate existing social inequalities.</p>	
24.	Industrial Interface	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>8.6.15 North Halswell – additional standards 8.7.13 North Halswell – additional matters – Medium and High Density Residential Zones in North Halswell 8.8.17 North Halswell – additional matters of discretion.</p>	Oppose	<p>Kāinga Ora considers that effects from industrial activities should first be mitigated at the source.</p> <p>The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p>	Delete the Industrial Interface Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be appropriate with the benefits of the QM not outweighing the costs.</p>	
25.	Riccarton Bush Interface	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.2.3 Medium Density Residential Zone – Building height.</p> <p>14.4.2.3 Residential Suburban Zone – Building height.</p>	Oppose	<p>Kāinga Ora considers that the existing long-established Operative Plan rules requiring a 10m building and earthworks setback from boundaries with the Bush are appropriate for managing potential interface issues/ impacts on tree health. The retention of the existing setback is quite different from the proposed QM which extends across roads and goes some distance from the Bush itself.</p> <p>The area around Riccarton Bush is ideally located for supporting a High Density</p>	<ol style="list-style-type: none"> 1. Delete the Riccarton Bush Interface Qualifying Matter and all associated provisions. 2. The existing tree setbacks in Chapter 9.4 are retained.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Residential Zone given its close proximity to a Metropolitan centre, cycleways, high frequency bus routes, and the large university activity hub.	
26.	Key Transport Corridors – City Spine	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.2.18 – Spine Road setbacks.</p> <p>14.6.2.17 - Spine road setbacks.</p> <p>15.4.2.10 – spine corridor setbacks.</p> <p>15.5.2.10 Setback from corridor.</p>	Oppose	<p>Kāinga Ora oppose the ‘City Spine’ being a qualifying matter and considers this to be inconsistent with the requirements of Section 77L.</p> <p>The associated rules require buildings and outdoor living spaces to be set back from spine road corridors in both residential and commercial zones. In commercial zones there is a direct conflict in urban design outcomes (and rules) where the Key Pedestrian Frontage rules require buildings to be built up to the road boundary in order to deliver good urban design outcomes and facilitates a continuous street edge (often with veranda cover for pedestrians).</p>	Delete the Key Transport Corridors – City Spine Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		15.6.2.11 Setback from corridor. 15.8.2.13 Setback from corridor. 15.10.2.10 Setback from corridor. 15.12.2.13 Setback from corridor. 15.14.5.3 Matters of Discretion.		<p>It is understood that the intention of the rule is to enable road widening in the future to accommodate public rapid transit. If Council's intention is to acquire land in the future to facilitate public works then it should use the designation powers available to it.</p> <p>Given the highly developed nature of these existing corridors with lengthy sections of commercial property built to the road boundary, it is unclear how any corridor-long road widening will occur without major land acquisition and demolition.</p>	
27.	Sites of historic heritage items and their settings (City Centre Zone) - Cathedral Square, New Regent Street, the Arts Centre.	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.	Support	Kāinga Ora support the management of Historic Heritage as a qualifying matter, noting that Cathedral Square, New Regent Street and the Arts Centre contain individually listed heritage items and are within identified heritage settings. This is a matter of	Retain sites of historic heritage items and their settings (City Centre Zone) - Cathedral Square, New Regent Street, the Arts Centre.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		15.11.1.2 C2 Works at 100 Cathedral Square 15.11.1.3 RD9 Works at 100 Cathedral Square 15.11.1.3 RD11 buildings on New Regent Street, the Arts Centre, and in the Central City Heritage Qualifying Matter and Precinct 15.11.2.11 Building height in area-specific precincts		national significance in Section 6.	
28.	Belfast/Northwood Outline Development Plan Features	15.4.3.2.1 Maximum building height; Appendix 15.15.1 Town Centre Zone (Belfast/Northwood) Outline Development Plan.	Neutral	Kāinga Ora does not have a view on this site-specific qualifying matter.	
Chapter 5 – Natural Hazards					
29.	5.5	Policy 5.2.2.5.1 – Managing development in Qualifying Matter Coastal Hazard Management Areas	Support in Part	Kāinga Ora support the management of significant risks from natural hazards as a qualifying matter (in appropriate circumstances), noting that it is a matter of national significance in Section 6.	Amend the policy as follows: Within the following Qualifying Matters, development, subdivision and land use that would provide for intensification of any site shall be avoided, unless the risk is from coastal inundation and a site specific assessment demonstrates the

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Kāinga Ora generally supports the risk based approach to the management of natural hazards but considers that the avoidance of intensification should be reserved to high risk from coastal inundation.</p> <p>Rule 5.4A.4 D1 requires resource consent for new buildings, other than accessory buildings, extensions etc, in areas shown on the planning maps as Qualifying Matter Coastal Hazard Medium Risk Management Area as a Discretionary Activity. Even with a site specific assessment however, Policy 5.2.2.5.1 seeks to avoid this.</p>	<p>risk is medium, low or very low based on thresholds defined in Table 5.2.2.5.1a below:</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
30.	5.5	Policy 5.2.2.5.2 - Managing development within Qualifying Matter Tsunami Management Area	Support in Part	<p>Kāinga Ora considers that the Council's intent to retain Residential Suburban / Residential Suburban Density Transition zoning in the Tsunami Management Area is disproportionate based on the modelled return period. This may be appropriate for 1:100 or 1:200, especially if such areas are also covered by high flood and/or coastal inundation risk overlays.</p> <p>Kāinga Ora seeks changes to the wording of Policy 5.2.2.5.2 to provide certainty of the outcomes intended, noting that the rule allows for up to four residential units to be constructed on these sites (Rule 14.4.1.1 P4, P5 and P6) so there is a disconnect between the use of the term 'avoid' and what the provisions would allow for as a permitted activity.</p>	<ol style="list-style-type: none"> Amend Policy 5.2.2.5.2 as follows: Within the Tsunami Management Area Qualifying Matter, avoid discourage development, subdivision and land use that would provide for intensification of any site, unless the risk to life and property is acceptable. Alternatively the Policy framework could be retained if the geographic extent of the QM matter is better aligned with a 1:100 return period or covers an area reflective of the Tsunami Inundation area identified by the Greater Christchurch Partnership as part of its consultation on the Greater Christchurch Spatial Plan.
31.	5.4	Flood hazard provisions	Support in Part	Kāinga Ora seek that spatial identification of flood hazard	<ol style="list-style-type: none"> Amend the provisions to remove / delete the mapped Hazard

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>management areas are made available through a set of non-statutory maps, which would operate as interactive maps on the Council's GIS website – thereby operating as a separate mapping viewer to the statutory District Plan maps. This approach is different to that of the traditional means of displaying hazard overlays on district plan maps and reflects that these maps do not have regulatory effect. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 Resource Management Act 1991 process. Kāinga Ora notes that this is an approach taken by other Councils around the country.</p>	<p>Management Areas from within the District Plan and instead hold this information in non-statutory GIS maps.</p> <ol style="list-style-type: none"> 2. Delete all references to maps within the District Plan. 3. Undertake any consequential amendments to zones, overlays, precincts, and qualifying matters to reflect the relief sought in the submission.
32.	5.4.1.3	Exemptions for daylight recession planes in the Flood Management Area	Support in Part	Kāinga Ora seeks for the applicable daylight recession planes in all residential zones to	Amend rules as follows:

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>be determined as if the ground level at the relevant boundary was the minimum floor level set in the activity specific standards in Rule 5.4.1.1, or natural ground level, whichever is higher.</p>	<p>5.4.1.3 a. For P1 and P2 in Rule 5.4.1.1, the applicable daylight recession plane in residential zones (other than in the Medium Density Residential Zone and High Density Residential Zone) shall be determined as if the ground level at the relevant boundary was the minimum floor level set in the activity specific standards in Rule 5.4.1.1, or natural ground level, whichever is higher.</p> <p>5.4.1.3b. For P3 and P4 in Rule 5.4.1.1, the applicable daylight recession plane in residential zones (other than in the Medium Density Residential Zone and High Density Residential Zone) shall be determined as if the ground level at the relevant boundary was the minimum floor level specified in the Minimum Floor Level Certificate issued under Rule 5.4.1.2, or natural ground level, whichever is higher.</p> <p>5.4.1.3 c</p> <p>viii. Rule 14.5.2.6 Height in relation to boundary – Medium Density Residential Zone</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>ix. Rule 14.6.2.2 Height in relation to boundary – High Density Residential Zone</p>
33.	5.4A	Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area	Oppose in Part	<p>Kāinga Ora seek that spatial identification of coastal hazard management areas be made available through a set of non-statutory maps, which would operate as interactive maps on the Council’s GIS website – thereby operating as a separate mapping viewer to the statutory District Plan maps. This approach is different to that of the traditional means of displaying hazard overlays on district plan maps and reflects that these maps do not have regulatory effect. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 Resource Management Act 1991 process. Kāinga Ora notes that this is an approach</p>	<ol style="list-style-type: none"> 1. Delete all references in all rules in this section that refer to maps. 2. Include a rule to provide for a Controlled Activity to subdivide within the Tsunami Management Area. 3. Amend Rule 5.4A.5 NC3 as follows: <ol style="list-style-type: none"> a. Development, subdivision and land use that would provide for residential intensification of any site within the Qualifying Matter Tsunami Management Area except that permitted or controlled in Rules 14.4.1 and 14.4.2. 4. Any consequential amendments to zones, overlays, precincts, and qualifying matters to reflect the relief sought in the submission.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>taken by other Councils around the country.</p> <p>Rule 5.4A.5 NC3 makes development, subdivision and land use that would provide for residential intensification of any site within the Qualifying Matter Tsunami Management Area except that permitted or controlled in Rule 14.4.1 a non-complying activity.</p> <p>Rule 14.4.2 deals with controlled activities so the rule outlined above needs to be amended to reference Rule 14.4.2.</p> <p>There is no applicable rules in the subdivision chapter for the Tsunami Management Area.</p> <p>Rule 14.4.1 provides for up to four residential units to be constructed as a permitted activity. If this level of intensification is provided for, then having a non-complying</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				activity status and an avoid policy seems nonsensical.	
Chapter 6 – General Rules and Procedures 6.10A – Tree Canopy Cover and Financial Contributions					
34.	6.10A	6.10A Rules 8.3, 8.5.1 and 8.7.12 - Subdivision; Rules 14.4.2 – 14.11.2 – Residential Built Form Standards. 14.6.1.3 RD13. 14.6.2.7 - Landscaping and tree cover.	Oppose	<p>Kāinga Ora welcomes the Council’s recognition of trees as a key element in successful urban environments.</p> <p>Kāinga Ora strongly support the Council increasing its prioritisation of the need to renew streetscapes, especially in areas where intensification has and will continue to occur. Such renewals should include kerb and channel replacement, undergrounding of overhead wires, and street tree planting.</p> <p>Kāinga Ora has substantial concerns with the 20% tree canopy cover target and considers it fundamentally</p>	Delete Section 6.10A and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>unachievable in medium and high density environments on private land. Kāinga Ora consider the requirements to achieve 20% tree canopy cover is inconsistent with the spatial outcome requirements set out in the NPS-UD, and the Medium Density Residential Standard (MDRS) provisions of the Housing Supply Act.</p> <p>Kāinga Ora considers that the proposed financial contribution calculator is complicated and flawed, a simpler formula would be to require 1 tree to be planted per 100m² of site area, as an easier compliance threshold than a trigger of 10% of future canopy cover.</p> <p>It also has concerns with the reliance on Financial Contributions. Given that Council already own extensive areas of park and open space land (including several thousand hectares of land on</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>the Port Hills and Red Zone), in addition to extensive road reserve and local park areas, and given that Council takes Development Contributions for new parkland as part of any new development, the need for the land component to form part of the financial contributions appears to be particularly hard to justify.</p> <p>The need to provide rapid canopy cover potentially creates a perverse incentive to plant faster growing exotic species rather than natives. The proposed Financial Contribution could therefore result in a decline in biodiversity by driving developers to plant exotics over natives, with attendant adverse biodiversity outcomes, which is contrary of the desire in the Urban Forest Plan to seek diversity in tree species.</p>	
Chapter 8 – Subdivision, Development and Earthworks					

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
35.		Policy 8.2.2.1 – Recovery activities	Support in Part	<p>PC14 seeks to delete this policy which provides for a range of intensification opportunities in the RS and RSDT zones.</p> <p>Deletion of this policy may well be appropriate if MRZ is properly implemented across all relevant residential zones and the Kāinga Ora submission opposing the Public Transport and Airport Noise Influence Area QMs is confirmed i.e. the only areas which retain low density RS/ RSDT/ RHZ zoning are those subject to a high risk of natural hazards.</p>	Delete the policy as notified.
36.		Policy 8.2.3.2 – Connections to infrastructure	Support	PC14 proposes an additional clause (g) relating to development in the vacuum sewer area. This policy provides for development in the area if connection is able to be made to a part of the waste water system that is not part of the vacuum sewer, or if sufficient capacity can be demonstrated (which could be for example through -on-site	Retain Clause (g) as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				holding tanks and off-peak pumping into the network).	
37.		<p>Tree Canopy and Financial Contribution provisions:</p> <p>Objective 8.2.6 and associated policies;</p> <p>Clause 8.3.1(e)-(f) – how to apply to the rules</p> <p>Clause 8.3.3(b) – financial contributions</p> <p>Clause 8.3.7 – consent notices</p> <p>Clause 8.7.12 – Assessment matters</p>	Oppose	In line with our submission seeking the deletion of the tree canopy financial contribution rules, the related proposed references to tree canopy in the subdivision chapter policies and rules is also opposed.	Delete the provisions relating to the tree canopy financial contribution and associated tree canopy rules.
38.		8.4.1.1 - Notification	Support	Support clause (a)(i) that any controlled or restricted discretionary subdivision application shall not be publicly or limited notified.	Retain 8.4.1.1 as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
39.		8.5.1.2 – Controlled activities – C8 and C9	Support	Support controlled activity status for the creation of vacant allotments (C8) or allotments containing an existing or consented dwelling (C9), where these allotments comply with density standards.	Retain C8 and C9 as notified
40.		8.5.1.3 – Restricted discretionary activities – RD2(c) and RD2A	Support	Support restricted discretionary activity status where the proposed allotments do not comply with C8 or C9.	Retain RD2(c) and RD2A as notified.
41.		8.6.1 – minimum dimensions	Oppose	<p>Support the use of a minimum dimension for the creation of vacant sections. However, Kāinga Ora recommends an 8m x 15m minimum shape factor for MRZ and HRZ sites as this is demonstrated as practicable to construct a permitted medium density residential dwelling.</p> <p>The rule needs clarification that the minimum sizes apply to the creation of vacant lots, rather</p>	<p>Amend clause 8.63.1(c) as follows:</p> <p><u>The creation of vacant allotments that do not contain an existing or consented residential unit Allotments</u> in the Medium Density (including MRZ Hills), and High Density Residential Zones, shall <u>have accommodate</u> a <u>minimum dimension shape factor</u> of <u>10m 8m x 15m</u>. <u>Within the Medium Density Residential (Residential Hills Precinct) Zone the allotment shall have a minimum dimension of 17m x 12m.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>than lots with an existing or consented dwelling.</p> <p>Similarly clarity needs to be retained that is explicit that the minimum net site provisions shall not apply to sites used exclusively for access, reserves, or infrastructure, or which are wholly subject to a designation.</p>	<p><u>This shape factor shall be located outside of:</u></p> <ol style="list-style-type: none"> <u>1. Land which may be subject to instability or is otherwise geotechnically unsuitable;</u> <u>2. Any existing or proposed easement areas required for access or services purposes;</u> <u>3. Network Utilities, including private and public lines.</u>
42.		<p>Table 1 – Minimum net site area</p> <p>Clause (a) and (c)</p> <p>Table 6 – Allotments with existing or proposed buildings</p>	Oppose	Kāinga Ora opposes both Table 1 and Table 6 and consider that the minimum shape factor provision proposed above is more appropriate	Delete Table 1 and Table 6.
44.		<p>8.9.2.1 – Earthworks</p> <p>Table 9</p>	Support in Part	<p>Earthworks are permitted through rule 8.9.2.31(P1), provided they comply with the volumes specified in Table 9.</p> <p>Table 9(d) in the Operative Plan limits earthworks to no more</p>	Amend Table 9(d) so the maximum volume is <u>50m³250m³/ site net fill above existing ground level</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>than 20m³ in all residential zones. Whilst these volumes do not include earthworks associated with a Building Consent i.e foundation construction, they are invariably triggered through the formation of driveways and landscaping. In practice, a 20m³ limit is frequently triggered for low density suburban development let alone medium density outcomes. As an example a standard driveway for a single dwelling is 4m wide by say 30m long = 120m². To build the driveway requires existing earth to be removed to a depth of 20cm, and then replaced with basecourse prior to being gravelled or asphalted. There is no change to existing ground levels. The cut is 24m³ (120m² x 0.2m depth), with fill being the same, resulting in 48m³.</p> <p>The rule threshold is considered to be unrealistically low, such that it generates numerous consents that are</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>invariably granted. The key effects that need to be controlled with earthworks are erosion and sediment control during construction (although the scale of such works means that they are generally completed within a couple of days and therefore do not generated significant risks of sediment discharge), and permanent changes to finished ground levels that would result in overlooking of neighbouring properties i.e. forming raised mounds or terraces.</p> <p>It is therefore sought that the rule be amended so the volume is net fill above existing ground levels. It is noted that filling within Flood Management Areas is separately controlled in Chapter 5.</p>	
Chapter 12 - Papakāinga/ Kāinga Nohoanga Zone and Chapter 8 subdivision					
45.	12.4.1 and 12.5.1	Activity status tables and built form rules	Support in Part	Kāinga Ora seek that the Papakāinga Zone be retained	Amend the Papakāinga/Kāinga Nohoanga Zone activity table and built

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				as a specific zone, given its unique policy outcomes and function. We seek that the MRZ built form rules however apply to the Papakāinga Zone. The activity status tables and built form standards are sought to therefore be amended to align with MRZ outcomes i.e. the Papakāinga Zone rules controlling matters such as height, boundary setbacks etc should simply align with those in the MRZ.	form standards to align with the built form rules in the MRZ.
46.	Chapter 8	Subdivision provisions relating to the Papakāinga/ Kāinga Nohoanga Zone	Oppose	The suite of subdivision provisions relating to minimum site sizes for the Papakāinga/ Kāinga Nohoanga Zone are sought to also be amended to align with MRZ outcomes.	Amend the subdivision standards for the Papakāinga/ Kāinga Nohoanga Zone to align with MRZ outcomes.
Residential Zone Introduction and Policy Framework – 14.1-14.2					
47.	Residential	14.1(e) Introduction to residential policies	Support in Part	Helpful statement for plan interpretation	Retain statement. Amend reference at the end of the statement to "...subclause g f "

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
48.	Residential	14.2.1 – Objective - housing supply	Support	Support amendments given that Christchurch has moved beyond the immediate earthquake recovery period. Support recognition that the community's housing needs may change, and that provision needs to take into account future needs.	Retain the objective
49.	Residential	Policy 14.2.1.1 – Policy – Housing distribution and density	Support in Part	<p>Support the amendments to clause (a)(ii) and (iii) that clearly state the expectation that high density residential development will be established in both the Central City and in and near identified commercial centres.</p> <p>By amending clause (iii) to now reference high density, the policy is now silent on the locations and expectation of medium density development. Given that the introduction of MRZ across most of the City, there is a need for a clear statement in the policy regarding what is now the normative housing density.</p>	<p>Retain clauses (a)(ii) and (iii).</p> <p>Add a new clause (a)(iv) as follows (with consequential renumbering of subsequent clauses):</p> <p><u>(iv) medium density residential development is established across the majority of the City unless precluded by a qualifying matter.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
50.	Residential	Table 14.2.1.1a – Zone descriptions	Support	The proposed MRZ and HRZ descriptions align with the National Planning Standards descriptions.	Retain zone descriptions
51.	Residential	Policy 14.2.1.2 and 14.2.1.3	Support	Support deletion of these two policies as their original policy direction regarding the location of new medium density areas no longer aligns with the direction in the Enabling Act.	Support the deletion of these two policies.
52.	Residential	Objective 14.2.2 and associated policies 14.2.2.1-14.2.2.4 – short term recovery	Oppose	<p>Given that Christchurch is now some 12 years post-earthquake there may no longer be a need for these policies and associated mechanisms such as the 'Enhanced development mechanism' (EDM) and the 'Community Housing Redevelopment Mechanism'(CHRM).</p> <p>The housing opportunities and more enabling built form standards now provided through the MRZ and HRZ may make this suite of policies and short-term recovery tools unnecessary, however if the</p>	Delete Objective 14.2.2 and associated policies 14.2.2.1-14.2.2.4 and the associated EDM and CHRM in the event that the Public Transport accessibility QM is removed, and the Tsunami Hazard QM reduced to 1:100 year hazard.

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				QM are retained and large parts of the city retain RS or RSDT then the EDM and CHRM are sought to remain as important tools.	
53.	Residential	Objective 14.2.3 and associated policies 14.2.3.1-14.2.3.5 - MDRS	Support	The objective and associated policies align with the policies mandated in the Enabling Act.	Retain the objective and associated policies. <i>Note that sequentially Policy 5 (14.2.3.3) should come at the end i.e. the policy 'batting order' should be 1 to 5 rather than the current arrangement of 1,2, 5, 3, 4.</i>
54.	Residential	Policy 14.2.2.2 b. iv. (Recovery housing higher density comprehensive redevelopment)	Oppose	Provided the Airport Noise Influence Area qualifying matter is deleted, the reference in Policy 14.2.2.2 b. iv. to Christchurch International Airport is unnecessary given the relevant land will be zoned for medium density residential development.	14.2.2.2 Policy - Recovery housing higher density comprehensive redevelopment a. Enable and incentivise higher density comprehensive development of suitably sized and located sites within existing residential areas, through an Enhanced development mechanism which provides:... iv. Christchurch International Airport, arterial traffic routes, and railway lines.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
55.	Residential	Policy 14.2.3.6 – Framework for building heights	Oppose	<p>The policy does not provide a framework or rationale for the proposed heights and does not specify what the ‘specific conditions’ might be when taller buildings would be enabled.</p> <p>There is merit in having a policy that clearly articulates the building height hierarchy, with this hierarchy tied to proximity to commercial centres and the size / range of services provided in those centres.</p> <p>The requested amendments also reflect the Kāinga Ora position that Metropolitan Centres be employed within the centres hierarchy, as per the forward-looking aspects of the NPS-UD policies of 1, 3, and 6.</p> <p>These are sought to cover the existing key activity areas for Riccarton, Papanui, and Hornby. Furthermore, the higher density zoning around the city centre and metropolitan centres, are sought to extend</p>	<p>Delete policy and replace with the following:</p> <p><u>Enable building heights in accordance with the planned urban built character for medium and high density areas, whilst also enabling increased building heights under specific conditions.</u></p> <p><u>Encourage greater building height, bulk, form and appearance to achieve high density planned urban form when within the proximity of nearby commercial centres to deliver:</u></p> <ol style="list-style-type: none"> a. <u>At least 10 storey buildings within 1.2km of the Central City and the Metropolitan Centre zones in Hornby, Riccarton and Papanui;</u> b. <u>At least 6 storey buildings in proximity to town centres and medium and large local centres;</u> c. <u>At least 3-4 stories everywhere else in the MRZ.</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				for 1.20 km, with a 400m Height Variation Overlay of 36m sought within 400m of the edge of these centres.	
56.	Residential	Policy 14.2.3.7 – management of increased building heights	Oppose	<p>The MDRS has the height rule as a restricted dictionary activity. MDRS Policy 5 explicitly seeks to ‘provide for developments not meeting permitted activity status, while encouraging high quality developments’.</p> <p>Taller buildings are therefore anticipated as being potentially appropriate subject to a site-specific assessment of effects. The policy needs to properly reflect that taller buildings are anticipated in appropriate locations and where the specific design properly manages the effects generated by the increase in height. As written this policy directly conflicts with Policy 5 of Sub clause 6 of Schedule 3A RMA.</p>	<p>Delete the policy and replace it with:</p> <p><u>Within medium and high density zoned areas, increased building heights are anticipated where:</u></p> <p>i. <u>The site has good accessibility to is public and active transport corridors, public open space, and a town or local commercial centre; and</u></p> <p>ii. <u>The design of the building appropriately manages potential shading, privacy, and visual dominance effects on the surrounding environment.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Taller residential buildings within 1.2km of the central city can only have a positive economic impact on the CBD by enabling more people to live within walking distance of the town centre. Given the large size of Christchurch, additional enablement of residential opportunities within 1.2km facilitates more people living near the centre i.e. it draws people in, rather than resulting in existing (or potential) CBD residents shifting out.	
57.	Residential	Policy 14.2.3.8 – fire fighting water capacity	Neutral		
58.	Residential	Objective 14.2.5 – high quality residential neighbourhoods	Support in Part	<p>Support the amendments to reference the planned urban character.</p> <p>References to ‘high’ quality in the title and the start of the objective will not always be appropriate or realistic. Use of language around ‘high standard’, ‘high level of amenity’, ‘spacious and</p>	<p>Amend the objective as follows:</p> <p>High Good quality, sustainable, residential neighbourhoods which are well designed, have a high level of amenity, enhance local character and reflect to reflect the planned urban character and the Ngāi Tahu heritage of Ōtautahi.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>attractive pedestrian circulation', 'high levels of glazing' can be used to set a bar that can be unrealistically high (or at least is very subjective). Kāinga Ora support high quality outcomes, however such language is subjective and is an easy stick that can be used by NIMBY opponents to higher density. Invariably multi-unit development involves the balancing of competing design outcomes (which are all perfectly valid), and it comes down to how these are balanced and prioritised – it often isn't possible to tick the optimal outcome across every matter.</p>	
59.	Residential	Policy 14.2.5.1 – Neighbourhood character, amenity, and safety	Oppose	<p>The matters subject to this policy are either captured in the MDRS policies which set the anticipated outcomes for MDRS, or are better articulated through proposed Policy 14.2.5.3 relating to</p>	Delete policy.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>developments of 4 or more units.</p> <p>Policy direction for the remaining low density residential environments is provided through Policies 14.2.5.6-9.</p> <p>This policy therefore duplicates directions which are already better articulated elsewhere in the policy framework</p>	
60.	Residential	Policy 14.2.5.2 – high quality medium density residential developments	Support in Part	<p>Support the amendments to reference the planned urban character.</p> <p>References to ‘high’ quality in the title will not always be appropriate or realistic.</p>	<p>Amend policy as follows:</p> <p>14.2.5.2 Policy – High Good quality, medium density residential development</p> <p>Encourage innovative approaches to comprehensively designed, high good quality, medium density residential development, which is attractive to residents, responsive to housing demands, and provides a positive contribution to its environment (while acknowledging the need for increased densities and changes in residential</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>character) reflects the planned urban built character of an area, through:</p> <ul style="list-style-type: none"> i. consultative planning approaches to identifying particular areas for residential intensification and to defining high good quality, built and urban design outcomes for those areas; ii. encouraging and incentivising amalgamation and redevelopment across large-scale residential intensification areas; iii. providing design guidelines to assist developers to achieve high good quality, medium density development; iv. considering input from urban design experts into resource consent applications; v. promoting incorporation of low impact urban design elements, energy and water efficiency, and life-stage inclusive and adaptive design; and vi. recognising that built form standards may not always support the best design and efficient use of a site for medium density development, particularly for larger sites.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
61.	Residential	Policy 14.2.5.3 – quality large scale developments	Support in Part	<p>The policy is generally appropriate and captures the key design elements necessary to support the good design of more intensive residential complexes.</p> <p>As above, ‘good quality’ is considered to be a more appropriate term than ‘high quality’.</p>	<p>Amend the policy as follows:</p> <p>14.2.5.3 Policy – Good gQQuality large scale developments</p> <p>a. Residential developments of four or more residential units contribute to a high good quality residential environment through site layout, building and landscape design to achieve:</p> <ul style="list-style-type: none"> i. engagement with the street and other spaces; ii. minimisation of the visual bulk of buildings and provision of visual interest; iii. a high good level of internal and external residential amenity; iv. high good quality shared spaces, including communal living spaces and accessways that provide safe, direct access for pedestrians; v. a safe and secure environment; and

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					vi. public through connections for large sites with multiple public frontages.
62.	Residential	Policy 14.2.5.4 – On-site waste storage	Oppose	A policy is not necessary for this level of detail. The matters addressed by the policy are covered at an appropriate level in Policy 14.2.5.3 above.	Delete policy
63.	Residential	Policy 14.2.5.5 – Wind effects	Support in Part	While Kāinga Ora does not oppose the potential need for wind effects to be considered, the concern lays around appropriateness of Matters of Discretion, the proposed height limits triggering an assessment and technical expertise available to carry out these assessments or determine if assessments (or anticipated effects) are appropriate.	<ol style="list-style-type: none"> 1. Retain Policy 14.2.5.5, noting that Kāinga Ora has submitted on provisions relating to wind effects. 2. Move all provisions relating to wind to sit under the General Rules.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
64.	Residential	Objective 14.2.6 – Medium density residential zone	Oppose	The MDRS objective 2 and Policies 1-5 discussed above (objective 14.2.3 and associated policies 14.2.3.1-14.2.3.5) provide the policy framework for MDRS and as such this objective and associated policy are unnecessary	Delete the objective
65.	Residential	Policy 14.2.6.1 - MDRS	Oppose	As per comments on Objective 14.2.6	Delete the policy
66.	Residential	Policy 14.2.6.2 – local centre intensification precincts	Oppose	As discussed in the section on HRZ height limits, the proposed approach to heights and precincts is unnecessarily complicated. Local Centre Intensification Precincts are well-located for enabling more people to live in close proximity to a range of services. The area covered by this precinct is sought to be simply rezoned to HRZ, and as such this policy is no longer necessary and can be deleted.	<ol style="list-style-type: none"> 1. Delete the policy and associated Local Centre Intensification Precinct from the planning maps. 2. As sought elsewhere in this submission, rezone the land within the Local Centre intensification Precinct to HRZ.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
67.	Residential	Objective 14.2.7 and associated policies - HDRS	Neutral	It would thematically make more sense for these provisions to be located after the policies on MRZ, which would then lead into the policies on heights and design outcomes	Relocate the HRZ provisions so they are located after the suite of MRZ policies i.e. after Policy 14.2.3.5.
68.	Residential	Objective 14.2.7 and policies 14.2.7.1-14.2.7.3	Support	The objective and policies provide for higher density development in appropriate locations.	Retain the objective and policies.
69.	Residential	Policy 14.2.7.4 and Policy 14.2.7.5	Oppose	As set out elsewhere in this submission, the precinct approach is unnecessarily complicated. A simplified approach is sought through amendments to the HRZ height rules, with this rationalised approach to heights provided with appropriate policy support through Objective 14.2.7 and policies 14.2.7.1-14.2.7.3 (along with Policy 14.2.3.7 as sought to be amended above)	Delete the policies and the associated Large Local Centre Intensification Precincts and the High Density Residential Precincts.
70.	Residential	Policy 14.2.7.6 – High density development	Oppose	The requirement that sites be at least two stories in height may not be appropriate in a range of circumstances and is	Delete the policy.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>unnecessarily complex – there is significant theoretical capacity in these areas so maintaining design flexibility is more important than maintaining capacity.</p> <p>Whilst sites can be amalgamated, there is no requirement for amalgamation.</p> <p>It can be quite appropriate to locate building height and mass away from the road edge in high density environments, depending on site shape, size, orientation, and building design</p>	
71.	Residential	Objective 14.2.8 and policies 14.2.8.1 and 14.2.8.2 – Central City	Support	This Operative Plan objective and associated policies are proposed to be deleted in PC14. This deletion is supported as the policy direction is no longer appropriate, with the purpose of the HRZ near the central city better articulated through the proposed new replacement provisions in 14.2.8 and policies 14.2.8.1 and 14.2.8.2	Support the deletion of these provisions as shown in PC14 as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
72.	Residential	<p>Objective 14.2.8 – Future urban zone</p> <p>Associated policies 14.2.8.1 to 14.2.8.7</p>	Support in Part	<p>See comments elsewhere regarding zone labelling. The FUZ label has not been appropriately applied to existing greenfield urban zoned locations – existing urban zoned but unbuilt residential land are sought to be MRZ (unless appropriately justified QM apply). An example of just such an approach is the correct application of a HRZ around the emerging Halswell commercial centre where already zoned RNN land is yet to be built, but has a proposed HRZ applied. In the same way the balance of this RNN area is to have a MRZ applied rather than FUZ.</p> <p>Taking a consistent national view in the application of National Planning Standards, the FUZ zone label is only used in other District Plans for areas that are yet to have an operative urban zone. A FUZ is a ‘holding zone’ that identifies where medium to long term urban growth is anticipated.</p>	<ol style="list-style-type: none"> 1. Delete references to FUZ and relabel existing urban zoned but undeveloped residential land as MRZ (or HRZ if appropriately located proximate to a large commercial centre). 2. Retain the 14.2.8 section as it provides useful direction on how the build-out of greenfield residentially zoned areas is to occur. 3. Amend the objective as follows: <ul style="list-style-type: none"> 14.2.8 Objective – <u>Development of greenfield areas</u> Future Urban Zone <p>Co-ordinated, sustainable and efficient use and development is enabled in the Future Urban Zone <u>greenfield growth areas</u>.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>The FUZ zone provisions are focussed on preventing rural activities from occurring that could prejudice future urbanisation e.g. quarries or intensive farming or lifestyle block subdivision. Invariably the plan frameworks require a further plan change process to be undertaken to activate or 'live zone' a residential zone that can then be developed.</p> <p>The associated policies that guide the build-out of greenfield areas remain appropriate.</p>	
73.	Residential	Policy 14.2.9.4 – Existing non-residential activities	Support in Part	<p>This existing Operative Plan policy has in practice created ambiguity when non-residential sites are proposed to be redeveloped for a different non-residential activity i.e. the reference to 'redevelopment' can be interpreted as only applying to the existing activity having new facilities, rather than enabling the site to be efficiently repurposed for a</p>	<p>Amend the policy as follows:</p> <p>Enable existing non-residential sites activities to continue to be used for a range of non-residential activities and support their redevelopment and expansion provided they do not:</p> <ul style="list-style-type: none"> i. have a significant adverse effect on the anticipated character and amenity of residential zones; or ii. are of a scale or activity that would undermine the role or

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>different type of non-residential activity.</p> <p>With neighbourhoods transitioning to medium density outcomes, it is important that residents have easy access to convenience retail and a range of community facilities. The adaption and repurposing of existing non-residential sites is a useful tool for enabling such provision as part of delivering good quality neighbourhoods.</p> <p>It is accepted that such changes need to be assessed on a case-by-case basis to ensure compatibility with a residential context, with the MRZ and HRZ description both anticipating that such zones will include compatible non-residential activities.</p>	<p><u>function of any nearby commercial centres, undermine the potential for residential development consistent with the zone descriptions in Table 14.2.1.1a.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
74.	Residential	Objective 14.2.12 and Policy 14.2.12.1 – compatibility with industrial activities	Oppose	<p>Kāinga Ora considers that at the interface of industrial and residential zones the onus for managing effects rest primarily with the industrial activity. The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p> <p>Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be appropriate with the benefits of the QM not outweighing the costs.</p>	Delete Objective 14.2.12 and Policy 14.2.12.1 and the Industrial Interface Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
75.	Residential	14.3 – how to apply the rules		Kāinga Ora notes that the relevant objectives and policies are still provided for within the Plan and therefore questions the relevance of these if the Community Housing redevelopment mechanism has been deleted.	<p>Consistent with this submission, Kāinga Ora supports the deletion of the Community Housing Redevelopment Mechanism, provided Plan Change 14 is amended consistent with the relief sought in this submission.</p> <p>Kāinga Ora notes that the relevant objectives and policies are still provided for within the Plan and therefore questions the relevance of these if the Community Housing redevelopment mechanism has been deleted.</p>
14.3 How to interpret and apply the rules					
76.	Residential	14.3 How to interpret and apply the rules – Clause f. xvi.	Oppose	The proposed deletion is consequential to the deletion of the Airport Noise Influence Area qualifying matter, amongst others deleted here and throughout the body of this submission.	<p>f. There are parts of residential zones where the permitted development, height and/or density directed by the MDRS or Policy 3 of the NPS-UD may be modified by qualifying matters. These are identified in detail in Chapter 6.1A and the Planning Maps, and include the following:</p> <p>i. Historic Heritage including heritage items, heritage settings, Residential</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>Heritage Area, Residential Heritage Area Interface</p> <p>ii. Riccarton Bush Interface Area</p> <p>iii. Heritage, Significant and other Trees</p> <p>iv. Sites of Ecological Significance</p> <p>v. Outstanding Natural Features and Landscapes</p> <p>vi. Sites of Cultural Significance</p> <p>vii. Residential Character Areas</p> <p>viii. High Flood Hazard Management Area</p> <p>ix. Flood Ponding Management Area</p> <p>x. Coastal Hazard High Risk Management Area and Coastal Hazard Medium Risk Management Area</p> <p>xi. Tsunami Management Area</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					xii. Slope Hazard xiii. Waterbody Setback xiv. Railway Building Setback xv. Electricity Transmission Corridor and Infrastructure xvi. Airport Noise Influence Area xvii. Waste Water Constraint Area xviii. Lyttelton Port Influence Area xix. Low Public Transport Accessibility Area xx. City Spine Transport Corridor xxi. Industrial Interface
14.4 Residential Suburban and RSDT Zone rules					
77.	Residential	14.4.2.2 – Tree and garden planting	Oppose	The proposed amendments to this rule duplicate and confuse the regulatory framework with	Delete the proposed amendments and retain the Operative Plan rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>the tree FC rule – essentially it introduces two rules to control the same matter.</p> <p>Kāinga Ora oppose the tree FC rule and this rule amendment for the reasons given in the submission on the tree FC rule.</p> <p>In the event that the tree FC rule is retained, this rule is sought to simply have an advice note directing Plan users to the FC rule and the additional tree canopy outcomes sought in that separate rule.</p>	
78.	Residential	14.4.2.3 - height	Oppose	<p>This rule introduces an 8m height limit if you're in the Riccarton Bush QM and under the Airport Noise Influence Area (which is why it has a RS zoning rather than MRZ).</p> <p>Kāinga Ora have opposed before the extent of the Airport Noise Influence Area and the Riccarton Bush QM and have sought the area around</p>	<ol style="list-style-type: none"> 1. Delete 8m Riccarton Bush height limit. 2. Delete 7m height rule in the Industrial Interface Qualifying matter area and apply relevant MRZ or HRZ heights.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Riccarton Bush is MRZ to the north and HRZ to the south, as such there is no need for an 8m height limit in the RS zone.</p> <p>Separately the height rule also introduces a 7m height limit in the industrial interface QM – which given that this is a rule being applied to the RS and RSDT zones this duplicates an existing situation. Kāinga Ora supports the deletion of this rule and application of relevant MRZ or HRZ zones and heights.</p>	
14.5 Medium Density Zone Rules					
79.	Residential	All controlled and RD rules re notification statements		<p>Consistent logic needs to be applied to the notification statements as follows:</p> <p>If the rule controls an internal occupant amenity matter or general street-scape outcomes then rule breaches should be non-notified as it is only the</p>	<p>1. Amend notification statements in both activity and built form rules to align with this logic.</p> <p>Non-notified:</p> <p>14.5.1.3 (RD1) – four or more units</p> <p>14.5.2.2 – landscaping</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>occupant who is affected or passers-by;</p> <p>If the rule it controls a neighbouring site interface matter then it should be open to an assessment re limited notification but should not be publicly notified. Ltd but not full;</p> <p>If it rule controls a matter that could impact on urban form at a neighbourhood scale e.g. height, then it should be open to a full s95 assessment.</p>	<p>14.5.2.5 – Outdoor Living Space</p> <p>14.5.2.8 – Outlook space</p> <p>14.5.2.9 – Fencing</p> <p>14.5.2.10 – Windows to street</p> <p>14.5.2.11 – Minimum unit size</p> <p>14.5.2.12 – Ground floor habitable space</p> <p>14.5.2.13 – Service and storage space</p> <p>14.5.2.15 – Garage and carports</p> <p>14.5.2.16 – Building reflectivity</p> <p>14.5.2.16 – mechanical ventilation</p> <p>14.5.2.18 – Spine road setbacks</p> <p>Open to limited but not public notification:</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
80.	Residential	Assessment matters	Oppose	The proposed assessment matters for both the '4 or more units' urban design rule and the built form rules are excessive and overlapping. Kāinga Ora seek that they are simplified and consolidated.	<ol style="list-style-type: none"> 1. For the 'non-notified' rules set out above, the matters for assessment are to be limited to the adequate provision of amenity for occupants and the delivery of a functional and attractive streetscape. 2. For the rules that potentially affect neighbouring sites set out above, additional matters relating to consideration of the amenity of neighbouring sites are appropriate. 3. For height, additional matters relating to urban form and proximity to services and public and active transport modes are appropriate, along with consideration of wind effects for buildings over 22m in height. 4. For the 4+ unit urban design rule, matters of discretion are sought to be as follows: <ol style="list-style-type: none"> a) <u>Whether the design of the development is in keeping with, or complements, the scale and character of development anticipated for the surrounding area and relevant significant natural, heritage and cultural features.</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>b) <u>The relationship of the development with adjoining streets or public open spaces including the provision of landscaping, and the orientation of glazing and pedestrian entrances;</u></p> <p>c) <u>Privacy and overlooking within the development and on adjoining sites, including the orientation of habitable room windows and balconies;</u></p> <p>d) <u>The provision of adequate outdoor living spaces, outdoor service spaces, waste and recycling bin storage including the management of amenity effects of these on occupants and adjacent streets or public open spaces;</u></p> <p><u>Where on-site car parking is provided, the design and location of car parking (including garaging) as viewed from streets or public open spaces</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
81.	Residential	14.5.1(P1) – Residential activity	support	<p>The proposed amendment to P1 to delete the limit on units with more than 6 bedrooms is supported. The definition of 'residential activity' includes emergency and refuge housing, and sheltered housing and so the amendment better enables such facilities to be established in the MRZ as a permitted activity where they provide accommodation for more than 6 residents.</p> <p>It is noted that boarding houses, student hostels, and retirement villages are separately defined and managed through separate rules.</p>	Retain rule as proposed.
82.	Residential	14.5.1(P3) – Elderly Persons Housing	Support in Part	Need to clarify – the Operative Plan P3 provides a permitted pathway for the conversion of Elderly Persons Housing to general tenure as a permitted activity. The provision of such a pathway is supported. PC14	<p>Either:</p> <ol style="list-style-type: none"> 1. Reinstate P3 so there is a clear permitted pathway; or 2. Include an advice note under P1 as follows:

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>proposes to delete this pathway.</p> <p>The PC14 amendment is ambiguous as to whether the deletion of P3 means that conversion of EPH is no longer permitted, OR is it proposed to be deleted because there is now no such thing as an EPH because MDRS now enables multi-units so it is now implicit that you can convert existing EPH as such conversion would simply fall within the ambit of P1?</p> <p>Given the number of EPH in the City it is important that there is an unambiguous position on how their conversion is to be treated.</p>	<p><u>Conversion of existing Elderly Persons Housing is permitted under P1.</u></p>
83.	Residential	Controlled		<p>PC14 deletes existing rules controlling non-compliance with tree and garden planting, ground floor habitable space, and service spaces. These are all existing Operative Plan rules rather than MDRS rules. Given</p>	<p>Retain controlled activity status Rule 14.5.1.2.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				that they are being retained as built form standards (apart from the overhang rule), the existing controlled activity status are sought to also be retained.	
84.		RD1 – urban design assessment	Support	Support retention of non-notified clause	Retain as notified
85.		RD27 – wind assessment	Oppose	<p>While Kāinga Ora does not oppose the potential need for wind assessments on tall buildings (above 6 storey), the concern lays around appropriateness of Matters of Discretion, the proposed height limits triggering an assessment and technical expertise available to carry out these assessments or determine if assessments (or anticipated effects) are appropriate.</p> <p>Kāinga Ora seeks that the rule provide a permitted pathway. Buildings may separately breach height rules but that is a separate matter (just as they will also invariably require</p>	<ol style="list-style-type: none"> 1. Delete the rule. 2. As an alternative relief in the event that a regulatory approach to wind modelling is retained, redraft the rule to provide for a permitted pathway (for wind effects) where compliance with the specified performance standards is met. 3. Kāinga Ora seeks that the provisions relating to wind effects are moved to sit under the General Rules.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				consent under RD2 for more than 3 units).	
86.		D11 – industrial interface QM	Oppose	<p>Kāinga Ora considers that at the interface of industrial and residential zones the onus for managing effects rest primarily with the industrial activity. The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p> <p>Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be appropriate with the benefits of</p>	Delete the Industrial Interface Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				the QM not outweighing the costs.	
87.		14.5.2.1 – servicing advice note	Support in Part	<p>Servicing constraints mean that whilst resource consent could be granted, Building Consent could be declined if services are not available. Infrastructure constraints need to be readily searchable via on-line tool that can be readily updated, given that CCC presumably know where capacity limits are.</p> <p>The general onus is on Council to address constraints within Council-controlled networks via LTP and DC processes to enable MDRS.</p>	<ol style="list-style-type: none"> 1. Retain the advice note. 2. Kāinga Ora seek that Council investigate the provision of an on-line publicly searchable tool to enable timely identification of site constraints.
88.		14.5.2.2 – Landscaping and tree canopy	Oppose	In accordance with our submission seeking deletion of the tree canopy financial contribution rule, the landscaping and tree canopy rule is sought to be deleted and	<p>Delete rule and replace with the following:</p> <p><u>14.5.2.2 landscaped area.</u></p> <p><u>(1) A residential unit at ground floor level must have a landscaped area of a minimum of 20% of a developed site</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>replaced with the MDRS standard.</p> <p>An additional clause is proposed for non-residential activities that aligns with the MDRS outcomes.</p>	<p><u>with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p> <p><u>2. The landscaped area may be located on any part of the development site, and does not need to be associated with each residential unit.</u></p> <p><u>3. Non-residential activities must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p>
89.		14.5.2.3(i)a - Height	Support	Rule implements MDRS as per Schedule 3A	Retain rule as notified
90.		14.5.2.3(i)b – Height in local centre intensification precincts	Oppose	<p>The Local Centre Intensification Precincts are all located in close proximity to large suburban commercial centres such as Barrington and Bishopdale Malls. These areas are well placed to be HRZ.</p> <p>The areas within this precinct are sought to be rezoned to</p>	Delete clause.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				HRZ and therefore this clause can be deleted.	
91.		14.5.2.3(iv) Industrial interface and (v) Riccarton Bush	Oppose	<p>Kāinga Ora considers that at the interface of industrial and residential zones the onus for managing effects rest primarily with the industrial activity. The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p> <p>Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be</p>	Delete 14.5.2.3(iv) and 14.5.2.3(v).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>appropriate with the benefits of the QM not outweighing the costs.</p> <p>The area around Riccarton Bush is ideally located for supporting a High Density Residential Zone given its close proximity to a large town centre, cycleways, high frequency bus routes, and the large university activity hub</p>	
92.		14.5.2.4 – Building Coverage	Support in Part	<p>The rule implements MDRS as per Schedule 3A.</p> <p>Kāinga Ora support additional exemptions for eaves and guttering, although it is sought that this be extended to 600mm which is a standard eave depth and better provides for weather tightness design solutions. Eaves do not have a significant impact on visual dominance, and setbacks from neighbours are controlled through separate</p>	<p>Amend rule as follows:</p> <ol style="list-style-type: none"> a. The maximum building coverage must not exceed 50% of the net site area. b. ... c. <u>Eaves and roof overhangs up to 300mm 600mm in width and guttering up to 200mm in width form the wall of a building shall not be included in the building coverage calculation.</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				rules on internal setbacks and height-to-boundary.	
93.		14.5.2.5 – Outdoor living space	Support	The rule implements MDRS as per Schedule 3A	Retain rule as notified.
94.		14.5.2.6 – Height to boundary	Oppose	The provision as proposed is inconsistent with the MDRS.	Delete and replace with MDRS provision.
95.		14.5.2.7 – Building setbacks	Support in Part	<p>Support clauses (a)(i) and (ii) as implements MDRS as per Schedule 3A.</p> <p>Support clause (iii) enabling eaves and gutters to project into the road boundary setback. Extend the eave exemption to 600mm to align with standard building practice, along with enabling deeper porches which have a strong functional benefit. Such projections have a minimal impact on streetscape amenity and can have benefits through providing greater</p>	<p>1. Retain clause (a)(i) and (ii) as notified.</p> <p>2. Amend clause(a)(iii) as follows:</p> <p>Only road boundary: Eaves, and roof overhangs, and porches to a maximum of 300mm 600mm in width measured from the wall of a building and guttering up to 200mm in width.</p> <p>3. Amend clause (a)(iv) as follows:</p> <p>All other accessory buildings or garages, including garages that internally access a residential unit.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
				<p>articulation in the street-facing facade.</p> <p>Clause (iv) – support reduction in setbacks for accessory buildings, subject to the limitations to height and length in the rule. A grammatical amendment would be helpful to clarify that accessory buildings do not need to have internal access to the dwelling</p>							
96.		14.5.2.8 – Outlook space	Support	The rule implements MDRS as per Schedule 3A. The minor amendment to clause (i)(i) is supported.	Retain the rule as notified.						
97.		14.5.2.9 - Fencing	Support in Part	<p>Support 2m height limit on internal boundary fencing.</p> <p>The proposed rules will result in a significant loss of occupant amenity where outdoor living is located between the unit and the street. Whilst such a layout is not generally preferred, for east-west streets, the units on the southern side of the street</p>	<p>Retain clause (iii) as notified.</p> <p>Delete clauses (i) and (ii) and replace with the following (Operative Plan rule and associated diagrams reinstated):</p> <table border="1"> <thead> <tr> <th></th> <th>Fence type</th> <th>standard</th> </tr> </thead> <tbody> <tr> <td>i</td> <td>Where at least 50% of the fence structure is</td> <td>1.8m</td> </tr> </tbody> </table>		Fence type	standard	i	Where at least 50% of the fence structure is	1.8m
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i	Where at least 50% of the fence structure is	1.8m									

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
				<p>will face north where it can often result in good design outcomes for the outdoor living to be located between the unit and the street to take advantage of the northern orientation.</p> <p>Retain the Operative Plan rules on road frontage fencing which are well understood by the design community and achieve an appropriate balance in occupant amenity and streetscape outcomes.</p>	<table border="1"> <tr> <td data-bbox="1507 373 1585 437"></td> <td data-bbox="1585 373 1827 437"><u>visually transparent</u></td> <td data-bbox="1827 373 1984 437"></td> </tr> <tr> <td data-bbox="1507 437 1585 592"><u>ii</u></td> <td data-bbox="1585 437 1827 592"><u>Where less than 50% of the fence structure is visually transparent</u></td> <td data-bbox="1827 437 1984 592"><u>1.2m</u></td> </tr> </table>		<u>visually transparent</u>		<u>ii</u>	<u>Where less than 50% of the fence structure is visually transparent</u>	<u>1.2m</u>
	<u>visually transparent</u>										
<u>ii</u>	<u>Where less than 50% of the fence structure is visually transparent</u>	<u>1.2m</u>									
98.		14.5.2.10 – Windows to the street	Support in Part	<p>Clause (a) of the rule implements MDRS as per Schedule 3A.</p> <p>Clause (b) re excluding gables is supported.</p> <p>Clause (c) relating to units with large streetscene setbacks is also supported as the large setbacks mean that the streetscene outcomes sought by the rule are less relevant.</p>	<ol style="list-style-type: none"> 1. Retain clauses (a)-(d) as notified. 2. Delete clause (e). 						

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Clause (d) to incentivise front doors and their contribution towards an attractive street façade is supported.</p> <p>Clause (e), whilst trying to be enabling, adds considerable (and unnecessary) complexity to the rule for little gain.</p>	
99.		14.5.2.11 – Minimum unit size	Support	No amendments are proposed to the Operative Plan rule on minimum unit sizes. This rule is well-established and appears to be working well.	Retain rule as notified.
100.		14.5.2.12 – Ground floor habitable room	Support in Part	<p>The Operative Plan includes a rule controlling ground floor habitable rooms which is well-established and appears to be working well.</p> <p>There are two key design outcomes sought, namely 1) the ground floor on the road frontage is habitable space rather than garaging in order to deliver positive streetscape outcomes; and 2) that at least 50% of the ground floor across</p>	<p>Amend the rule as follows:</p> <p>a.— Any building that includes a residential unit shall:</p> <p>i.— Where the residential unit fronts a road or public open space, unless built over a separate ground floor residential unit, have a habitable room located at ground floor level with a minimum internal dimension of 3 metres; and</p> <p>ii.— Any residential unit shall have at least 50% of any ground floor area as habitable rooms.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>the site is habitable space, to avoid the ground floor of complexes being overly dominated by garaging and undercroft parking areas.</p> <p>The proposed rule is sought to be amended to better articulate these two outcomes and to avoid developments arranged as horizontally stacked low-rise apartments being unnecessarily penalised through a requirement for every unit to individually have ground floor space.</p> <p>As all MRZ now has a height limit of 11m or more, clause (b) requires amendment, noting that the outcomes of 50% habitable remains as a valid outcome for the small areas of MRZ that have a height of less than 11m through QMs.</p>	<p>a. <u>Where a residential unit fronts a road or public open space, it shall have a habitable room with a minimum internal dimension of 3 metres located at the ground floor level facing the frontage. This rule does not apply to upper-level units that are built over a separate ground floor residential unit; and</u></p> <p>b. <u>Where the permitted height limit is over 11m (refer to Rule 14.5.2.3), a minimum of 50% of the ground floor area across the site shall be occupied by habitable spaces and/or indoor communal living space. This area may include pedestrian access to lifts, stairs, and foyers.</u></p> <p>c. This rule does not apply to residential units in a retirement village.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
101.		14.5.2.13 - storage	Support in Part	<p>The requirement for outdoor storage for bins and washing lines is an Operative Plan rule that appears to be working well.</p> <p>Clause (a) relating to outdoor storage is supported, although may be an unnecessary level of regulation if this matter is adequately covered by urban design assessment matters.</p> <p>Clause (b) is a new rule in PC14. It requires a minimum amount of internal storage to be provided. Whilst internal storage spaces are useful, this rule is considered to be an unnecessary level of regulation.</p> <p>It is noted that clause (a) only applies to 4 or more units, while clause (b) applies to all units i.e. it is unclear what the rationale is behind the different number of units that trigger the clauses.</p>	<ol style="list-style-type: none"> 1. Retain clause (a). 2. Delete clause (b). 3. Alternatively storage could be addressed as an assessment matter for developments of 4 or more units.
102.		14.5.2.14 – Water supply for fire fighting	Neutral		

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
103.		14.5.2.15 – Garage location	Support in Part	<p>The location of car parking can have a significant impact on streetscape quality. A requirement to recess garaging or carports behind the front building line is supported.</p> <p>It is noted that this rule is only triggered where there are 4 or more units. It also does not apply to surface car parking areas which can also have a significant adverse effect on streetscape. Recessing is only required along the street frontage i.e. the rule must not apply to the front face of units located internally within a site.</p>	<p>Amend the rule as follows:</p> <p>14.5.2.15 garaging and carport building and parking area location</p> <p><u>When developing four or more residential units on a single site, where a residential unit fronts towards a road, any garage, or carport shall be located at least 1.2 metres behind the front façade of a residential unit.</u></p>
104.		14.5.2.16 – Building reflectivity; and RD29	Oppose	<p>New rule that applies to the Residential Hills Precinct – Christchurch as had residential hill suburbs for over 100 years and these areas have not given rise to excessive glare issues from dwellings. Whilst rules controlling reflectivity can be appropriate in rural ONLs where the key outcome is to minimise the visibility of</p>	Delete rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>structures, such an outcome is not appropriate in residential suburbs where housing is an inherent part of the landscape.</p> <p>Requiring low light reflectance values means that buildings have to be finished in dark colours which can exacerbate urban heat island effects and require increased use of air conditioning to reduce unit heating in summer.</p>	
105.		<p>14.5.2.17 – Location of outdoor mechanical ventilation;</p> <p>And RD30</p>	Oppose	<p>New rule that requires a 3m setback if at ground level between a residential unit and the road or a shared accessway. Presumably it is visual effects that are the concern.</p> <p>The rule constitutes a level of design detail that is unnecessary to regulate. If mounted at ground level then even a short 1.2m high fence is sufficient to visually screen in a</p>	Delete the rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>similar manner to the proposed rule on bin storage.</p> <p>As drafted the rule applies to mechanical units on the ground, whereas they would be permitted if wall-mounted despite having a worse visual outcome. It also applies to mechanical units located adjacent to internal boundaries where the property next door (over the fence) has an accessway.</p>	
106.		14.5.2.18 – Spine Road setbacks	Oppose	<p>The new rule requires buildings and outdoor living spaces to be set back 4m from spine road corridors (where the corridor is less than 24m in width, which is the majority of the corridor given 20m road reserves are typical).</p> <p>It is understood that the intention of the rule is to enable road widening in the future to accommodate public rapid transit. If Council's intention is to acquire land in the future to</p>	<ol style="list-style-type: none"> 1. Delete the rule. 2. If land acquisition for public works is the intent, then Council should initiate a Notice of Requirement to designate the corridor.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>facilitate public works then it should use the designation powers available to it.</p> <p>Given the highly developed nature of these existing corridors with lengthy sections of commercial property built to the road boundary, it is unclear how any corridor-long road widening will occur without major land acquisition and demolition.</p>	
High Density Residential Zone					
107.		Controlled and Restricted Discretionary notification statements	Support in Part	<p>Consistent logic needs to be applied to the notification statements as follows:</p> <p>If the rule controls an internal occupant amenity matter or general street-scape outcomes then rule breaches are sought to be non-notified as it is only the occupant who is affected or passers-by;</p>	<p>Amend notification statements in both activity and built form rules to align with this logic.</p> <p>Non-notified:</p> <p>14.6.1.3 (RD2) – four or more units</p> <p>14.6.2.7 – landscaping</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>If the rule it controls a neighbouring site interface matter then it should be open to an assessment re limited notification but should not be publicly notified. Ltd but not full;</p> <p>If it rule controls a matter that could impact on urban form at a neighbourhood scale e.g. height, then it should be open to a full s95 assessment.</p>	<p>14.6.2.10 – Outdoor Living Space</p> <p>14.6.2.4 – Outlook space</p> <p>14.6.2.5 – Building separation</p> <p>14.6.2.6 – Fencing</p> <p>14.6.2.8 – Windows to street</p> <p>14.6.2.16 – Minimum unit size</p> <p>14.6.2.9 – Ground floor habitable space</p> <p>14.6.2.11 – Service and storage space</p> <p>14.6.2.14 – Garage and carports</p> <p>14.6.2.15 – mechanical ventilation</p> <p>14.6.2.17 – Spine road setbacks</p> <p>Open to limited but not public notification:</p> <p>14.6.2.12 – Building coverage</p> <p>14.6.2.2 – height to boundary</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					14.6.2.3 – internal boundary setbacks 14.6.2.13 – Water for Firefighting (FENZ only) Open to full s95 assessment: 14.6.2.1 – height
108.		Assessment matters	Oppose	The proposed assessment matters for both the '4 or more units' urban design rule and the built form rules are excessive and overlapping. Kāinga Ora seeks that they be simplified and consolidated.	<ol style="list-style-type: none"> 1. For the 'non-notified' rules set out above, the matters for assessment are sought to be limited to the adequate provision of amenity for occupants and the delivery of a functional and attractive streetscape. 2. For the rules that potentially affect neighbouring sites set out above, additional matters relating to consideration of the amenity of neighbouring sites are appropriate. 3. For height, additional matters relating to urban form and proximity to services and public and active transport modes are appropriate, along with consideration of wind effects for buildings over 22m in height.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>4. For the 4+ unit urban design rule, matters of discretion are sought to be as follows:</p> <p>e) <u>Whether the design of the development is in keeping with, or complements, the scale and character of development anticipated for the surrounding area and relevant significant natural, heritage and cultural features.</u></p> <p>f) <u>The relationship of the development with adjoining streets or public open spaces including the provision of landscaping, and the orientation of glazing and pedestrian entrances;</u></p> <p>g) <u>Privacy and overlooking within the development and on adjoining sites, including the orientation of habitable room windows and balconies;</u></p> <p>h) <u>The provision of adequate outdoor living spaces, outdoor</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p><u>service spaces, waste and recycling bin storage including the management of amenity effects of these on occupants and adjacent streets or public open spaces;</u></p> <p>i) <u>Where on-site car parking is provided, the design and location of car parking (including garaging) as viewed from streets or public open spaces.</u></p>
109.		RD2 and RD6 – urban design	Support in Part	<p>RD2 is the Operative Plan rule that requires an urban design assessment for more than 3 units. Clause (a)(i) of the rule implements MDRS as per Schedule 3A.</p> <p>Clause (a)(ii) and (iii) are unnecessary as the assessment of projects that do not comply with garage location and ground floor habitable space are addressed through proposed rule RD20.</p>	<p>Retain clauses (a)(i) and (b)</p> <p>Delete clauses (a)(ii) and (iii).</p> <p>Delete rule RD6</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Given that the purpose of this rule is to enable an urban design assessment, rather than consideration of any built form rule breaches, the retention of the clause (b) 'not limited or publicly notified' clause is supported.</p> <p>Proposed RD6 simply duplicates the assessment required under RD2(a)(i) and therefore is unnecessary and is sought to be deleted.</p>	
110.		RD7 and RD 8 – building heights 14.6.2.1 - Height	Oppose	<p>The approach to managing height is unnecessarily over-complicated and seeks to introduce additional built form rules relating to outdoor living space and internal boundary setbacks as an activity standard.</p> <p>Kāinga Ora seek that the Plan be simplified so that the MRZ has a single height limit rule as per the MDRS (subject to QMs). What is currently the MDRS Local Centre</p>	<ol style="list-style-type: none"> 1. Delete these two activity rules. <p>Replace with:</p> <p><u>Buildings that do not meet Rule 14.6.2.1 Building Height.</u></p> <ol style="list-style-type: none"> 2. Retain matter of discretion reference to 'Impacts on neighbouring property – Rule 14.15.3a'. 3. Delete references to: Town Centre Intensification Precinct; and replace with 'Height Variation Overlay'.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Intensification Precinct is sought to be rezoned to HRZ.</p> <p>The HRZ is sought to have two height limit areas – a 22m limit for the majority of the area taking in what are currently the MRZ Local intensification precinct, and the Large Local Centre Intensification Precinct. The extent of the HRZ is proportionate to the size of the centre so large centres support a greater walkable catchment. But the height enabled in the HRZ remains the same at 22m.</p> <p>HRZ is sought 0-1.20km from the edge of the MCZ and the CCZ.</p> <p>A 36m 'Height Variation Control' is sought to apply 0-400m from the edge of the Metropolitan Centre Zone (as sought within this submission) (Riccarton, Hornby and Papanui centres).</p>	<p>4. Subject to the relief sought above, further consequential changes may be necessary to fully incorporate the effects of the zone changes discussed in the reason related to Metropolitan Centres.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>A 36m 'Height Variation Control' is sought to replace the High Density Residential Precinct and 0-400m from the edge of the CCZ.</p> <p>Rules controlling boundary setback, height to boundary, outdoor living space, and landscaping are all covered by other built form rules. The PC14 height to boundary rule requires at least a 6m setback from boundaries for buildings over 12m.</p> <p>Tall buildings are anticipated in the HRZ and therefore are sought to be permitted up to the height limit. Such buildings will remain subject to an assessment of qualitative urban design outcomes as covered by the urban design assessment matters for 4+ units.</p> <p>Buildings that exceed the height limits are RD, and subject to additional assessment of the</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				built form matters of discretion for height breaches.	
111.	Residential	14.6.1.3 RD13	Oppose	In accordance with our submission seeking deletion of the tree canopy financial contribution rule, the landscaping and tree canopy rule is sought to be deleted and replaced with the MDRS standard.	Delete the rule.
112.		RD17	Support in Part	<p>While Kāinga Ora does not oppose the potential need for wind assessments on tall buildings (above 6 storey), the concern lays around appropriateness of Matters of Discretion, the proposed height limits triggering an assessment and technical expertise available to carry out these assessments or determine if assessments (or anticipated effects) are appropriate.</p> <p>The rule should provide a permitted pathway. Buildings may separately breach height</p>	<ol style="list-style-type: none"> 1. Delete the rule. 2. As an alternative relief in the event that a regulatory approach to wind modelling is retained, redraft the rule to provide for a permitted pathway (for wind effects) where compliance with the specified performance standards is met. 3. Kāinga Ora seek that the provisions relating to wind effects are relocated to within the General Rules.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				rules but that is a separate matter (just as they will also invariably require consent under RD2 for more than 3 units).	
113.		D1 and NC1 –education, spiritual, heath, pre-school activities	Support in Part	<p>The Operative Plan has restrictive rules controlling non-residential activities within the City Centre (Four Avenues) due to historic pressure to develop such areas for non-residential use.</p> <p>The HRZ now extends much further than the City Centre, however the restrictive ‘4 Aves’ rules have been carried over so they now apply throughout the HRZ.</p> <p>The HRZ includes areas in close proximity to the larger commercial centres where the provision of a range of community facilities is very appropriate and has long been anticipated and provided for in the District Plan. Easy accessibility to such services</p>	<ol style="list-style-type: none"> 1. Retain Rule D1 for education, spiritual, heath, pre-school activities located inside the Four Avenues. 2. Adopt the MRZ provisions/ activity status for such activities located in the HRZ outside the Four Avenues.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>and facilities is likewise a key element in delivering well-functioning urban environments and good quality high density residential neighbourhoods.</p> <p>Whilst retention of the existing restrictive approach to such facilities inside the Four Avenues may be appropriate, the existing framework in the Residential Medium Density Zone is considered to be more appropriate for the HRZ areas outside of the Four Avenues.</p>	
114.		Add new provisions for retail, office, and commercial service activity on the ground floor of apartment buildings		It is common for apartment buildings to contain a small-scale commercial activity on the ground floor, often adjacent to the entrance foyer and as a means of buffering residential activity from what can be busy frontage roads. The provision of such services can likewise have significant convenience benefits for residents and is consistent with a good quality, high density neighbourhood. The ability to provide shared workspaces in	<p>Add a new restricted discretionary and fully discretionary rule as follows:</p> <p><u>Retail, office, and commercial service activity</u></p> <p><u>a. Activity status: Restricted Discretionary</u></p> <p><u>Where:</u></p> <p><u>i. The retail, office, or commercial service activity is limited to the</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>apartment buildings is consistent with emerging remote working trends where people still seek companionship during the day whilst working remotely from their employer. Provided the scale of non-residential facilities is limited there is minimal potential for such to undermine the role and function of nearby commercial centres which typically cover several hectares.</p>	<p><u>ground floor tenancy of an apartment building;</u></p> <p><u>ii. The gross floor area of the activity/activities does not exceed 200m²; and</u></p> <p><u>iii. The hours of operation are between:</u></p> <p><u>i. 7.00am and 9.00pm Monday to Friday; and</u></p> <p><u>ii. 8.00am and 7.00pm Saturday, Sunday, and public holidays.</u></p> <p><u>The Council's discretion shall be limited to the following matters:</u></p> <p><u>a. The design, appearance and siting of the activity;</u></p> <p><u>b. Noise and illumination;</u></p> <p><u>c. Signage.</u></p> <p><u>2. Activity status: Discretionary</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<u>Where compliance is not achieved with the matters specified in HRZ-RX(a)(i), (ii) and/or (iii).</u>
115.		14.6.2 – Built form standards note	Oppose	<p>The built form rules start with a new note that the standards apply “to all permitted activities and restricted discretionary RD2” i.e. 3+ units.</p> <p>This note is ambiguous as it implies that the built form standards do not apply to any non-residential activities or activities that breach other RD, D or NC rules.</p> <p>It is questionable whether the note is necessary, but if it is to be retained it would be better placed in the ‘how to use the rules’ section. Kāinga Ora seek that it simply state that in addition to being subject to the activity standards, all buildings are also subject to the built form rules.</p>	<ol style="list-style-type: none"> Delete the note. As an alternative relief, if the note is to be retained, then relocate it to the ‘how to use the rules’ section 14.3 as follows: <p><u>In addition to being subject to the activity standards, all buildings are also subject to the built form standards.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
116.		14.6.2.1 - Height	Support in Part	See discussion under RD7 and RD8 above.	Amend clause (a) of the rule as follows: a. Buildings must not exceed 14.22 metres in height above ground level; b. <u>Buildings located in the Height Variation Control overlay must not exceed 36 metres in height above ground level;</u>
117.		14.6.2.2 – Height to boundary	Support in Part	Kāinga Ora supports the encouragement of perimeter block development and building mass at front edge. However there is some concern over if the 20m, or 60% element of the provision is appropriate. For example, the 20m length should be increased to better align with standard block sizes in the High Density Zone. Kāinga Ora is also concerned, while the intent of the rule will achieve desired development outcomes, its drafting could be simplified.	Redraft provisions to improve clarity for plan users and ensure that dimensions referred to in the provision reflects block sizes within the High Density Zone.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
118.		14.6.2.3 - Setbacks	Support in Part	<p>Support clauses (a) and (b)(i) as implements MDRS as per Schedule 3A.</p> <p>Support clause (b)(ii) – support reduction in setbacks for accessory buildings, subject to the limitations to height and length in the rule. A grammatical amendment would be helpful to clarify that accessory buildings do not need to have internal access to the dwelling.</p> <p>Support clause (b)(iii) enabling eaves and gutters to project into the road boundary setback. Extend the eave exemption to 600mm to align with standard building practice, along with enabling deeper porches which have a strong functional benefit. Such projections have a minimal impact on streetscape amenity and can have benefits through providing greater articulation in the street-facing facade.</p>	<p>Retain clause (a) and (b)(i) as notified.</p> <p>Amend clause (b)(ii) and (iii) as follows:</p> <p>(b) This standard does not apply to site boundaries:</p> <p>(i)...</p> <p>(ii) side and rear setbacks: for accessory buildings or garages, including garages that internally access a residential unit, where the accessory building or garage is less than 3 metres in height and the total length of the building does not exceed 10.1m; and</p> <p>(iii) front boundary setbacks: where eaves, and roof overhangs, and porches up to 300mm 600mm in width and guttering up to 200mm in width from the wall of a building intrude into the boundary setback.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
119.		14.6.2.4 - Outlook Space	Support	Support as implements MDRS as per Schedule 3A. Minor amendment to clarify clause (i) is also supported.	Retain rule as notified
120.		14.6.2.5 – Building separation	Support in Part	<p>It is understood that the intent of the rule is to manage built form within the site i.e. the rule is to ensure separation between two towers on the same site, rather than provide separation with buildings on neighbouring sites (as separation to neighbours is managed through a combination of height to boundary, internal boundary setbacks and outlook space rules).</p> <p>The outcome of having reasonable space between taller built elements on the same site is supported, subject to the rule being amended to make its application clear.</p> <p>The other option is to delete the rule and rely on separation being addressed in part through the outlook space rule, plus</p>	<p>Delete the rule and replace as follows:</p> <p><u>Any parts of a building located more than 12m above ground level shall be separated by at least 10m from any other buildings on the same site that are also located more than 12m above ground level.</u></p> <p><u>Or alternatively, delete the rule entirely.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought									
				urban design assessment matters, and therefore this rule is unnecessary.										
121.		14.6.2.6 - Fencing	Support in Part	<p>Support 2m height limit on internal boundary fencing.</p> <p>The proposed rules will result in a significant loss of occupant amenity where outdoor living is located between the unit and the street. Whilst such a layout is not generally preferred, for east-west streets, the units on the southern side of the street will face north where it can often result in good design outcomes for the outdoor living to be located between the unit and the street to take advantage of the northern orientation.</p> <p>Retain the Operative Plan rules on road frontage fencing which are well understood by the design community and achieve an appropriate balance in occupant amenity and streetscape outcomes.</p>	<p>Retain clause (iii) relating to internal boundaries as notified.</p> <p>Delete clauses (i) and (ii) and replace with the following (Operative Plan rule and associated diagrams reinstated):</p> <table border="1"> <thead> <tr> <th></th> <th>Fence type</th> <th>standard</th> </tr> </thead> <tbody> <tr> <td>i</td> <td><u>Where at least 50% of the fence structure is visually transparent</u></td> <td><u>1.8m</u></td> </tr> <tr> <td>ii</td> <td><u>Where less than 50% of the fence structure is visually transparent</u></td> <td><u>1.2m</u></td> </tr> </tbody> </table>		Fence type	standard	i	<u>Where at least 50% of the fence structure is visually transparent</u>	<u>1.8m</u>	ii	<u>Where less than 50% of the fence structure is visually transparent</u>	<u>1.2m</u>
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i	<u>Where at least 50% of the fence structure is visually transparent</u>	<u>1.8m</u>												
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ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
122.		14.6.2.7 - Landscaping and tree cover	Oppose	<p>In accordance with our submission seeking deletion of the tree canopy financial contribution rule, the landscaping and tree canopy rule is also sought to be deleted and replaced with the MDRS standard.</p> <p>An additional clause is proposed for non-residential activities that aligns with the MDRS outcomes.</p>	<p>Delete rule and replace with the following:</p> <p><u>14.5.2.2 landscaped area</u></p> <p><u>(1) A residential unit at ground floor level must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p> <p><u>2. The landscaped area may be located on any part of the development site, and does not need to be associated with each residential unit.</u></p> <p><u>3. Non-residential activities must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p>
123.		14.6.2.8 - Windows to street	Support in Part	<p>Clause (a) of the rule implements MDRS as per Schedule 3A.</p>	<p>Retain clause (a)-(d) as notified.</p> <p>Delete clause (e).</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Clause (b) re excluding gables is supported.</p> <p>Clause (c) relating to units with large streetscene setbacks is also supported as the large setbacks meant that the streetscene outcomes sought by the rule are less relevant.</p> <p>Clause (d) to incentivise front doors and their contribution towards an attractive street façade is supported.</p> <p>Clause (e), whilst trying to be enabling, adds considerable (and unnecessary) complexity to the rule for little gain.</p>	
124.		14.6.2.9 – Ground floor habitable rooms	Support in Part	<p>The Operative Plan includes a rule controlling ground floor habitable rooms which is well-established and appears to be working well.</p> <p>There are two key design outcomes sought, namely 1) the ground floor on the road</p>	<p>Amend the rule as follows:</p> <p>a. Any building that includes a residential unit shall:</p> <p>i. Where the residential unit fronts a road or public open space, unless built over a separate ground floor residential unit, have a habitable room located at ground floor level</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>frontage is habitable space rather than garaging in order to deliver positive streetscape outcomes; and 2) that at least 50% of the ground floor across the site is habitable space, to avoid the ground floor of complexes being overly dominated by garaging and undercroft parking areas.</p> <p>The proposed rule is sought to be amended to better articulate these two outcomes and to avoid developments arranged as horizontally stacked low-rise apartments being unnecessarily penalised through a requirement for every unit to individually have ground floor space.</p> <p>The outcome of 50% habitable at ground floor across a site is an appropriate outcome for HRZ.</p>	<p>with a minimum internal dimension of 3 metres; and</p> <p>ii. Any residential unit shall have at least 50% of any ground floor area as habitable rooms.</p> <p>a. <u>Where a residential unit fronts a road or public open space, it shall have a habitable room with a minimum internal dimension of 3 metres located at the ground floor level facing the frontage. This rule does not apply to upper-level units that are built over a separate ground floor residential unit; and</u></p> <p>b. have at least 50% of any ground floor area as habitable rooms, except on sites where at least 25% of the building footprint is more than 4 storeys, which shall have at least 30% of any ground floor area as habitable rooms.</p> <p><u>A minimum of 50% of the ground floor area across the site shall be occupied by habitable spaces and/or indoor communal living space. This area may include pedestrian access to lifts, stairs, and foyers.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
125.		14.6.2.10 - Outdoor living space	support	<p>Clauses (a) and (b) implement MDRS as per Schedule 3A</p> <p>Clause (c) provides a useful reduction for studio/ 1 bed units to 15m² (ground floor) or 6m² balcony if located above ground floor.</p>	Retain rule as notified.
126.		14.6.2.11 – Storage space	Support in Part	<p>The requirement for outdoor storage for bins and washing lines is an Operative Plan rule that appears to be working well.</p> <p>Clause (a) relating to outdoor storage is supported, although may be an unnecessary level of regulation if this matter is covered by urban design assessment matters.</p> <p>Clause (b) is a new rule in PC14. It requires a minimum amount of internal storage to be provided. Whilst internal storage spaces are useful, this rule is considered to be an unnecessary level of regulation.</p>	<ol style="list-style-type: none"> 1. Retain clause (a), noting that if outdoor storage is addressed as an urban design assessment matter then a separate rule may be unnecessary. 2. Delete clause (b).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				It is noted that clause (a) only applies to 4 or more units, while clause (b) applies to all units i.e. it is unclear what the rationale is behind the different number of units that trigger the clauses.	
127.		14.6.2.12 - Building coverage	Support in Part	<p>The rule implements MDRS as per Schedule 3A.</p> <p>Support additional exemption for eaves and guttering, although this is sought to be extended to 600mm which is a standard eave depth and better provides for weather tightness design solutions. Eaves do not have a significant impact on visual dominance, and setbacks from neighbours are controlled through separate rules on internal setbacks and height-to-boundary.</p> <p>Clause (a)(ii) seeks to enable greater site coverage in the HRZ. An increase to 60% is supported and is a useful tool in differentiating between MRZ</p>	<ol style="list-style-type: none"> 1. Amend as follows: <ol style="list-style-type: none"> a. <u>The maximum building coverage must not exceed 50 60% of the net site area;</u> <ol style="list-style-type: none"> i. <u>Any eaves and roof overhangs up to 300mm 600mm in width and guttering up to 200mm in width from the wall of a building shall not be included in the building coverage calculation.</u> 2. Delete Clause (a)(ii).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				and HRZ. The proposed clause is however unnecessarily complex, with outdoor space and landscaping both subject to other rules and noting that the proposed ground floor habitable space rule will also necessitate the provision of ground floor outdoor living spaces.	
128.		14.6.2.13 – water supply for fire fighting	Neutral		
129.		14.6.2.14 - Garaging	Oppose	<p>Whilst the equivalent rule in the MRZ requires garaging to be recessed behind the front façade, this rule requires garaging to be located behind the rear façade of a residential unit.</p> <p>This rule is unworkable for carparking levels in apartment buildings where such parking is invariably located beneath (or above) a residential unit rather than behind the unit's rear façade.</p>	<p>Delete the rule and replace as follows:</p> <p><u>14.6.2.14 garaging and carports</u></p> <p><u>Where a residential unit fronts towards a road, any garage or carport shall be located at least 1.2 metres behind the front façade of a residential unit.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>For smaller scale developments ie. 2-3 storey, having parking recessed behind the front façade provides an acceptable outcome, in combination with the urban design assessment matters for 4+ units.</p> <p>The rule wording sought in the equivalent rule in the MRZ is considered to be equally applicable.</p>	
130.		14.6.2.15 – Location of mechanical ventilation	Oppose	<p>New rule that requires a 3m setback if at ground level between a residential unit and the road or a shared accessway. Presumably it is visual effects that are the concern.</p> <p>Level of design detail that is unnecessary to regulate. If mounted at ground level then even a short 1.2m high fence is sufficient to visually screen in a similar manner to the proposed rule on bin storage.</p>	Delete the rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				As drafted the rule applies to mechanical units on the ground, whereas they would be permitted if wall-mounted despite having a worse visual outcome. It also applies to mechanical units located adjacent to internal boundaries where the property next door (over the fence) has an accessway.	
131.		14.6.2.16 - Minimum unit sizes	Support	No amendments are proposed to the Operative Plan rule on minimum unit sizes. This rule is well-established and appears to be working well.	Retain rule as notified.
132.		14.6.2.17 - Spine road setbacks	Oppose	<p>The new rule requires buildings and outdoor living spaces to be set back 4m from spine road corridors (where the corridor is less than 24m in width).</p> <p>It is understood that the intention of the rule is to enable road widening in the future to accommodate public rapid transit. If Council's intention is to acquire land in the future to</p>	<p>Delete the rule.</p> <p>If land acquisition for public works is the intent, then Council should initiate a Notice of Requirement to designate the corridor.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>facilitate public works then it should use the designation powers available to it.</p> <p>Given the highly developed nature of these existing corridors with lengthy sections of commercial property built to the road boundary, it is unclear how any corridor-long road widening will occur without major land acquisition and demolition.</p>	
14.7 – Residential Hills Zone					
133.				<p>The Residential Hills zone is an existing Operative Plan zone that covers the Port Hills Suburbs. PC14 as notified includes a QM on public transport accessibility. Areas that fall within this QM retain their existing low-density Operative Plan zoning.</p> <p>It would appear that the public transport QM is the only QM</p>	Delete zone and replace with MDZ.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				that is generating the need to retain the Residential Hills Zone. Given our submission that the public transport QM is not a valid QM and is sought to be deleted, a consequence is that the Residential Port Hills Zone is also sought to be deleted and replaced by MRZ	
14.12 – Future Urban Zone					
134.				See above discussion on Objective 14.2.8. The Future Urban Zone ('FUZ') is a relabelling of Residential New Neighbourhood Zone. This is the wrong label and not the intention of the National Planning Standards. FUZ are a mechanism for signalling rural areas that will be urbanised at some point in the future as a holding pattern, with the 'live' zone to be developed at a later date through a subsequent plan change process. RNN are existing well-established live	Delete the FUZ and replace with MDRZ. The associated rules relating to build-out of these areas/ compliance with ODPs, or any area-specific rules can equally be located at the end of the MDRZ provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				zones (albeit that some of them are still being built out). These areas are sought to simply be MDRZ unless there is a qualifying matter in play that would preclude MDRZ zoning.	
14.14 – Community Housing Redevelopment Mechanism					
136.	Chapter 14.14 – Community Housing Redevelopment Mechanism	Whole Chapter	Support	Kāinga Ora supports the deletion of the Community Housing Redevelopment Mechanism, provided Plan Change 14 is consistent with the MDRS and NPS-UD.	Kāinga Ora supports the deletion of the Community Housing Redevelopment Mechanism, provided Plan Change 14 is amended consistent with the relief sought in this submission.
Chapter 15 - Commercial					
137.		Related to the commercial chapter as a whole	Support in part	Kāinga Ora seeks that Metropolitan Centres are introduced within the centres hierarchy, as per the forward-looking aspects of the NPS-UD policies of 1, 3, and 6. These are sought to cover the existing key activity areas for Riccarton, Papanui, and Hornby. The size,	<ol style="list-style-type: none"> 1. Insert reference to Metropolitan Centres in all relevant provisions of the chapter. 2. Insert rules for metropolitan centre zone as attached in Appendix 2.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>scale, existing and future function of these centres are such that they merit the application of a Metropolitan Centre Zone classification, and thus an appropriate objective, policy and rules framework.</p> <p>Further, recent and proposed investment in public and active transport modes along the corridors in which these activity centres are located support the case for a zoning classification reflective of their relative position within the centres hierarchy.</p>	
Chapter 15.2 – Commercial Policy framework					
138.		Policy 15.2.2.1, Table 15.1 – Commercial zone titles	Support in part	<p>Support amendments to Table 15.1 of Policy 15.2.2.1 in so far as these reflect National Planning Standards nomenclature.</p> <p>Kāinga Ora</p>	<p>Realignment of Commercial Zone names with National Planning Standard (NPS) zone descriptions (Chapter 2 Interpretation). The allocation of centres to the NPS labelling appears generally appropriate if Metropolitan Centre is added.</p> <p>B. Town Centre: Key Activity Centre:</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>Retain reference to '<i>High Density Housing is contemplated ... and around larger local centres</i>'.</p> <p>C. Local Centres: Retain reference to '<i>High Density Housing is contemplated ... and around larger local centres</i>'.</p>
138.		Table 15.1 - Centre hierarchy		<p>The role and function of centres has a direct bearing on the associated geographic extent and zoning of high density residential zoning around the centre. The hierarchy needs to reflect both current condition and potential future state in the event that enabled development occurs.</p> <p>The centre hierarchy for Local Centres in particular is considered to be unnecessarily complex and it is sought that these be simplified, along with a commensurate simplification in the heights and zoning of the surrounding residential area.</p>	<ol style="list-style-type: none"> 1. Amend role and function of Church Corner, Sydenham and Merivale from 'Local Centre (Large)' to 'Town Centre'. 2. Consolidate all Local Centres into a simple category i.e. delete the distinction between 'small' and 'medium'. 3. Incorporate Metropolitan centres and relabel Riccarton, Hornby, Papanui Northlands as such and as shown within Appendix 3.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Church Corner, Sydenham and Merivale are evolving and will be establishing a substantial residential catchment through development enabled by PC14. In addition, these 'centres' are positioned within corridors identified as Mass Transit Network and Growth Corridors within the Greater Christchurch 'Huihui Mai' Consultation Plan for accommodating Growth to 2050. The corresponding Council s32 Report 'Commercial Appendix 2' identifies such centres as performing a greater role in intensification enablement and diversity of function.</p> <p>The large local centres should be town centres, with small and medium local centres merged into a single 'local centre' category.</p>	
139.		Policy 15.2.2.7 – Residential activity in centres	Support in part	Amend so that the provision also provides for residential activity within Neighbourhood centres. Rule 15.5.1.1.1(P19)	Amend Policy 15.2.2.7 as follows: Residential activity in district Town, and

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				provides for such above ground floor, or to the rear of the premises fronting the street.	Local <u>and neighbourhood</u> centres Residential activity in district town , <u>and</u> Local <u>and neighbourhood</u> neighbourhood centres
140.		Objective 15.2.3(b) – Mixed use areas	Support in part	<p>Kāinga Ora support the principle of providing for Mixed Use Zones proximate to the City Centre Zone to transition to higher density residential neighbourhoods.</p> <p>The application of the provision is unclear however. The ‘Objective Heading’ refers to mixed use <u>outside the central city</u>. Central City is defined (in the operative Plan) as that part of the City contained within the four avenues. Whereas the amendment to Chapter 2 Interpretation to introduce ‘City Centre – means the City Centre Zone’.</p> <p>This confusion is then reinforced in Policy 15.2.3.2 where the ‘heading’ references Mixed Use Zones outside the central city, then conflicts with</p>	<p>Amend the objective as follows:</p> <p>15.1.1 Objective - Office parks and mixed use areas <u>outside the central city (except the Central City Mixed Use and Central City Mixed Use (South) Zones)</u>.</p> <p>a. Recognise the existing nature, scale and extent of commercial activity within the Commercial Office and Commercial Mixed Use Zones, but avoid the expansion of existing, or the development of new, office parks and/or mixed use areas.</p> <p>b. <u>Mixed use zones located within a 15min walking distance of close to the City Centre Zone transition into high density residential neighbourhoods that contribute to an improved</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>(b) which references increased opportunities within a 15 minute walking distance of the City Centre Zone (which would therefore include the Commercial Central City Mixed Use and Central City Mixed Use (South Frame) zones). If the aim is to deliberately exclude the Central City Mixed Use and South Frame Zones, this should be made clear, and Policy 15.2.7.1 'Diversity of Activities' amended to encourage a transition into good quality residential neighbourhoods.</p> <p>'Close' should be replaced by explicit reference to the respective zones (presumed to be the 15-minute walking distance in Policy 15.2.3.2(b)).</p> <p>Referencing a reduction in greenhouse gas emissions is superfluous in this context, given proximity and modal choice.</p>	<p><u>diversity of housing type, tenure and affordability</u> and support a reduction in greenhouse gas emissions.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>The intent and objectives of these amendments to the plan change do not seem to be achievable through the rules proposed. Kāinga Ora submits that it may be more appropriate to consider these zone changes and rules through a subsequent schedule 1 process.</p>	
141.		Policy 15.2.3.2 – Mixed use	Support in part	<p>Amend ‘outside the central city’ as above.</p> <p>A ‘high quality’ residential neighbourhood is subjective and is referenced in terms of residential zone outcomes (Objective 14.2.4). Such is an inappropriately high threshold for residential development in a transitioning and Mixed Use zone. Contributing positively to quality and design is sufficient.</p> <p>Delete reference to ‘reducing greenhouse gas emissions’ as this would be immaterial at this scale, and the areas are zoned for mixed use which anticipates residential activity being</p>	<p>Amend as follows: 15.2.3.2 Policy – Mixed use areas outside the central city (except the Central City Mixed Use and Central City Mixed Use (South) Zones)</p> <p>a. Recognise the existing nature, scale and extent of retail activities and offices in mixed use zones outside the central city in Addington, New Brighton, off Mandeville Street and adjoining Blenheim Road, while limiting their future growth and development to ensure commercial activity in the City is focussed within the network of commercial centres.</p> <p>b. Support mixed use zones at</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>proximate to necessary facilities / employment thereby reducing trip journeys. Support for greater housing diversity and including 'alternative housing models' although noting that these are not well defined (Chapter 2 Interpretation).</p> <p>The greenway requirements in Appendix 15.15.12 and 15.15.13 are problematic to implement given the fragmented ownership of these areas. The provision of small parks and greenlinks is a matter for Council to facilitate through LGA processes and a more comprehensive place-making programme that will be vital in supporting a shift from industrial to mixed use neighbourhoods. If specific greenlinks are considered to be vital then the Council should use its designation powers to secure these spaces as a more efficient and effective method than the proposed comprehensive housing rules.</p>	<p><u>Sydenham, Addington, off Mandeville Street, and Philipstown located within a 15 minute walking distance of the City Centre Zone, to transition into high good quality residential neighbourhoods by:</u></p> <ol style="list-style-type: none"> i. <u>enabling comprehensively designed high-good-quality, high-density residential activity;</u> ii. <u>ensuring that the location, form and layout of residential development supports the objective of reducing greenhouse gas emissions and provides for greater housing diversity including alternative housing models;</u> iii. <u>requiring developments to achieve a high-good standard of on-site residential amenity to offset and improve the current low amenity industrial environment and mitigate potential conflicts between</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>uses;</p> <p>iv. <u>encourage small-scale building conversions to residential use where they support sustainable re-use and provide high-good quality living space, and contribute to the visual interest of the area.</u></p> <p>c. Avoid Comprehensive Residential Development of sites within the Comprehensive Housing Precinct that are identified in Appendix 15.15.12 and 15.15.13 unless the relevant shared pedestrian/cycleway, greenway or road connection is provided.</p> <p>d. For sites identified within Appendix 15.15.12 and 15.15.13 encourage the connection to facilitate convenient and accessible through block connectivity.</p>
142.		Objective 15.2.4 – urban form	Support	No changes necessary.	Retain the objective as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
143.		Policy 15.2.4.1 – scale and form	Support in part	<p>The foundation of this policy is found within Policy 3 of the NPS – UD. That Policy requires at clause (a) within city centre zones, building heights and density of urban form to realise as much development capacity as possible. Accordingly, the current wording of clause (i) to (v) which seek to limit building height is not supported.</p> <p>For clause (b)(i) the duplication associated with the amendment can be removed.</p> <p>For clause(b)(ii) it is considered that the District Plan should be forward looking, hence the need for building heights to be commensurate with their 'anticipated' role.</p>	<p>1. Amend Clause (a) as follows:</p> <p>15.2.4.1 Policy – Scale and form of development</p> <p>a. Provide for development of a significant scale and form <u>massing that reinforces the City's City Centre Zone's distinctive sense of place and a legible urban form by enabling as much development capacity as possible to maximise the benefits of intensification, whilst managing building heights adjoining Cathedral Square, Victoria Street, New Regent High Street and the Arts Centre to account for recognised heritage and character values.</u> in the core of District Centres and Neighbourhood Centres, and of a lesser scale and form on the fringe of these centres.</p> <p>2. Delete Clause (a)(i)-(v).</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>1. Amend Clause (b) as follows:</p> <p>b. The scale and form of development in other commercial centres shall:</p> <ul style="list-style-type: none"> i. reflect the context, character and the anticipated scale of the zone and centre's function by: ii. providing for the tallest buildings and greatest scale of development in the city centre to reinforce its primacy for Greater Christchurch and enable as much development capacity as possible to maximise the benefits of intensification;... <p>2. Retain the remaining parts of clause (b) as notified.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
144.		Policy 15.2.4.2 - design	Oppose	There is no basis within the MDMR Act nor NPS-UD that facilitates or provides support for the inclusion of these provisions. It is considered that the provisions introduced would function to limit or reduce potential development capacity. The provisions are not accompanied by a comprehensive s32, do not adequately recognise the functional requirements associated with commercial developments, and would not be the more appropriate in terms of achieving Objective 3.3.1 and 3.3.2 of the Plan.	Delete all inclusions introduced and retain existing Operative Plan Policy 15.2.4.2.
145.		Policy 15.2.4.6 – Strategic Infrastructure	Support in Part	This policy contains operative plan wordings using the term ‘avoiding’ in relation to noise sensitive activities and the Airport Noise Influence Area, we seek amendment to this wording to reflect management solutions are appropriate.	Amend policy 15.2.4.6 as follows: Provide for the effective development, operation, maintenance and upgrade of strategic infrastructure and avoid adverse effects of development on strategic infrastructure through managing the location of activities and the design of stormwater areas. This includes but is not limited to, managing noise sensitive activities within commercial zones

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					located within the 50-dB Ldn Air Noise Contour and within the Lyttelton Port Influences Overlay Area.
146.		Objective 15.2.5(a)(i)	Support in Part	This policy contains existing Operative Plan wording that's no longer appropriate "...and limiting the height of buildings to support an intensity of commercial activity across the zone".	Amend Objective 15.2.5 as follows: <ul style="list-style-type: none"> a. A range of commercial activities, community activities, cultural activities, residential activities and guest visitor accommodation are supported in the Central City to enhance its viability, vitality and the efficiency of resources, while encouraging activities in specific areas by: <ul style="list-style-type: none"> i. Defining the Commercial Central City Business City Centre Zone as the focus of retail activities and offices and limiting the height of buildings to support an intensity of commercial activity across the zone;

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
147.	Central City	Policy 15.2.6.3 - Amenity	Support in part	<p>Deletion of the operative clause (ii) is supported.</p> <p>Seek deletion or amendment of inserted clause (ii) which acts as a proxy to otherwise limit height contrary to the statutory requirement of Policy 3 of the NPS-UD.</p>	<ol style="list-style-type: none"> 1. Support the deletion of existing clause (a)(ii). 2. Delete the replacement Clause (a)(ii).
148.	Central City	Policy 15.2.6.4 – Residential intensification	Support in part	<p>Seek moderation of the qualifier 'high quality' to either good, or 'positively contributes'.</p>	<p>Amend Policy 15.2.6.4(a) as follows:</p> <p>Encourage the intensification of residential activity within the Commercial Central City Business City Centre Zone by enabling high-good quality residential development that positively contributes to supports a range of types of residential development typologies, tenures and prices, with an appropriate level of amenity including:...</p>
149.	Central City	Policy 15.2.6.5 – Pedestrian focus	Oppose	<p>Delete the PC14 amendment relating to 'wind generation'. It is not considered that the respective s32 analysis demonstrates that such limits/</p>	<p>Amend Policy 15.2.6.5(ii) as follows:</p> <p>ii. requiring development to support a</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				wind rules are the most efficient or effective method.	pedestrian focus through controls over building location and continuity, weather protection, height, wind generation , sunlight admission, and the location of parking areas;
150.	Central City Mixed Use Zone	Objective 15.2.7 – central city mixed use	Oppose	Delete insertion of reference to 'high quality' as inappropriate in this context.	15.2.7 Objective – Role of the Central City Mixed Use Zone a. The development of vibrant, high good quality urban areas where a diverse and compatible mix of activities can coexist in support of the Commercial Central City Business City Centre Zone and other areas within the Central City Central City .
151.	Central City Mixed Use Zone	Policy 15.2.7.1 – diversity of activities	Support in part	The Central City mixed use zone is well located within easy walking and cycling distance of the wide range of services and facilities on offer. As such the height limit is sought to reflect such proximity and not be tagged or limited to colocation with large faculties, as the whole of the zone is well-	<u>Amend Clause (a)(viii) as follows:</u> <u>viii. opportunities for taller buildings to accommodate residential activity and visitor accommodation, to support the vibrancy of the City Centre Zone, where co-located with the and the nearby large-scale community facilities, Te Kaha</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				located in close proximity to these facilities.	<u>and Parakiore.</u>
152.	Central City Mixed Use Zone	Policy 15.2.8.1 - usability, Policy 15.2.8.2 - amenity	Oppose	<p>The amenity provisions introduced are too fine grain to be set as policies, are unsubstantiated by s32 analysis, do not respond to a resource management issue, and would act as detriment to development. Kāinga Ora seek that these be deleted.</p> <p>Policy 15.2.8.2(viii) is not opposed, subject to the amendments sought above as to setting an appropriate urban design context, and not set at 'high quality'.</p>	<ol style="list-style-type: none"> 1. Retain Policy 15.2.8.1 as existing in the Operative Plan and delete all PC14 amendments. 2. Retain Policy 15.2.8.2 as existing in the Operative Plan and delete all PC14 amendments, with the exception of clause (viii) which is sought to be retained.
153.	Central City Mixed Use Zone	Policy 15.2.8.3 – residential development	Oppose	The requirements in the NPS-UD to facilitate differing housing typologies and provide intensification opportunities is disabled by provisions seeking excessive private amenity space.	<p>Delete amendments seeking improved private amenity space, compensatory to the predominantly commercial nature of the Central City Mixed Use Zone.</p> <p>15.2.8.3 Policy Residential Development</p> <p>a. provide for ...</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>b. <u>Require a level of private amenity space for residents that is proportionate to the extent of residential activity proposed.</u> and which compensates for the predominantly commercial nature of the area, including consistent with the intended built form and mix of activities within that environment, through:...</p>
154.	Central City Mixed Use Zone (South Frame)	Policy 15.2.10.2 – residential development	Support	Policy amendments appropriately recognise area context.	Retain policy as notified
15.4 – Commercial Zone rules					
155.	Town Centre Zone Rules Local Centre Rules Neighbourhood Centre Zone	City Spine Transport Corridor 15.4.1.3(RD8) 15.5.1.3(RD8) 15.6.1.3(RD7)	Oppose	Delete the provision in its entirety. The provision is not justified in terms of s32, is not the most appropriate mechanism to secure increased road widths, or proxy road reserve planting and landscaping at the expense of developable area. Provision and Qualifying matter is not	Delete all City Spine Transport Corridor activity rules from the suite of commercial zones.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	Large Format Retail Zone Mixed Use Zone	15.8.1.3(RD3) 15.10.2.10		supported by Policy 4/ clause 3.32 of the NPS-UD. Inconsistency with design outcomes specified in Rule 15.4.2.3, including clause (i) Key Pedestrian Frontages as associated with Riccarton, Church Corner, Merivale and Papanui Centres. If road widening is required to facilitate rapid transit infrastructure then Council should use its designating powers.	
156.	Town Centre Zone Built Form Standards Local Centre Built Form Standards	15.4.2.1(a)(ii) 15.5.2.1(a)(i)	Oppose / cl16(b)	Delete erroneous reference to Local Centre in 15.4.2.1(a)(ii) Delete erroneous reference to Town Centre in 15.5.2.1(a)(i)	ii. 1,000m² GLFA where located in a Neighbourhood Local Centre identified in Policy 15.2.2.1, Table 15.1 ii. 4,000m² GLFA where located in a District Town Centre as identified in Policy 15.2.2.1, Table 15.1; or
157.	Town Centre Zone Built Form Standards	14.4.2.2 Maximum Building Height	Support in part	Increased development capacity is sought to be enabled specifically at Hornby,	1. Adopt Metropolitan Centre Zone Rules proposed in the Kāinga Ora submission Appendix 2 and amend

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought												
				<p>Riccarton and Papanui noting that the role and function of these centres is already straddling that associated with the role and function of Metropolitan Centres as set out within the National Planning Standards. The adoption of the Metropolitan Centre Rules Kāinga Ora seeks would take into account that role and function (including social amenity) would be anticipated to grow and diversify given the anticipated level of residential catchment growth. An appropriate height limit is accordingly 36m.</p> <p>For the remaining Town Centres, noting anticipated corridor growth and development as associated with Sydenham, Merivale and Church Corner (elevating these centres to Town Centres in the retail hierarchy) (refer submission to Table 15.1) a height limit of 22m is the more appropriate.</p>	<p>these rules as appropriate.</p> <p>2. Amend rule 14.4.2.2 as follows:</p> <p>a. The maximum height of any building shall be as follows:</p> <table border="1" data-bbox="1547 603 2002 1023"> <thead> <tr> <th data-bbox="1547 603 1608 660"></th> <th data-bbox="1608 603 1843 660">Applicable to</th> <th data-bbox="1843 603 2002 660">Standard</th> </tr> </thead> <tbody> <tr> <td data-bbox="1547 660 1608 799">i.</td> <td data-bbox="1608 660 1843 799">All sites in a <u>District Town Centre (other than specified below)</u></td> <td data-bbox="1843 660 2002 799">20 metres</td> </tr> <tr> <td data-bbox="1547 799 1608 963">ii.</td> <td data-bbox="1608 799 1843 963"><u>All sites in a Town Centre at Riccarton, or Hornby or Papanui</u></td> <td data-bbox="1843 799 2002 963"><u>22 metres</u></td> </tr> <tr> <td data-bbox="1547 963 1608 1023">iii.</td> <td data-bbox="1608 963 1843 1023">...</td> <td data-bbox="1843 963 2002 1023"></td> </tr> </tbody> </table>		Applicable to	Standard	i.	All sites in a <u>District Town Centre (other than specified below)</u>	20 metres	ii.	<u>All sites in a Town Centre at Riccarton, or Hornby or Papanui</u>	<u>22 metres</u>	iii.	...	
	Applicable to	Standard															
i.	All sites in a <u>District Town Centre (other than specified below)</u>	20 metres															
ii.	<u>All sites in a Town Centre at Riccarton, or Hornby or Papanui</u>	<u>22 metres</u>															
iii.	...																

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
158.	Town Centre Zone Built Form Standards	Sunlight and Outlook 15.4.2.5	Oppose in part	Refer submission point relating to amended Recession Planes as a Qualifying Matter and changes to Appendix 14.16.2.	Consequential amendments associated with Appendix 14.16.2. Adopt Metropolitan Centre Zone Rules proposed in the Kāinga Ora submission Appendix 2 and amend these rules as appropriate.
	Local Centre Zone Standards	15.5.2.5			
	Neighbourhood Centre Zone Standards	15.6.2.4			
	Large Format Zone	15.8.2.4			
	Commercial Office Zone	15.9.2.4			
	Mixed Use Zone	15.10.2.4			
	City Centre Zone	15.11.2.9			
	Central City Mixed Use Zone	15.12.2.6			

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
159.	Town Centre Zone Built Form Standards Local Centre Zone Standards Neighbourhood Centre Zone Standards Large Format Zone Mixed Use Zone City Centre – Mixed Use Zone	City Spine Transport Corridor 15.4.2.10 15.5.2.10 15.6.2.11 15.8.2.13 15.10.1.3 (RD5) 15.12.2.13 / 15.12.1.3(RD6)	Oppose	Delete the provision in its entirety. The provision is not justified in terms of s32, is not the most appropriate mechanism to secure increased road widths, or proxy road reserve planting and landscaping at the expense of developable area. Provision and Qualifying matter is not supported by Policy 4/ clause 3.32 of the NPS-UD.	Delete all City Spine Transport Corridor built form rules from the suite of commercial zones.						
160	Local Centre Zone Built Form Rules – Maximum Building Height	15.5.2.2		Support in part As identified in the submission point on Town Centre heights – Merivale, Church Corner and Sydenham are sought to be elevated to a 'Town Centre' zone and provided with a 22m height limit.	Replace the table in 15.5.2.2 as follows (with Merivale, Church Corner and Sydenham elevated in Table 15.1 to Town Centre zoning): <table border="1" data-bbox="1547 1155 2002 1318"> <thead> <tr> <th></th> <th>Applicable to</th> <th>Standard</th> </tr> </thead> <tbody> <tr> <td>ii</td> <td><u>Ferrymead and all sites in a Local Centre (medium)</u></td> <td><u>20 metres</u></td> </tr> </tbody> </table>		Applicable to	Standard	ii	<u>Ferrymead and all sites in a Local Centre (medium)</u>	<u>20 metres</u>
	Applicable to	Standard									
ii	<u>Ferrymead and all sites in a Local Centre (medium)</u>	<u>20 metres</u>									

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought												
				<p>In the alternative, they are sought to be afforded a 22m height limit as Local Centre (Large).</p> <p>As sought above the remaining medium centres and Ferrymeed are sought to become 'large' Local Centres, with the 'small' Local Centres simply being 'local centres'.</p> <p>In terms of heights, the new large centres are sought to have a consistent 22m height limit to provide for additional capacity and conformity with the proposed HRZ height limits adjoining these centres within this submission. The exception is New Brighton, given qualifying matters associated with appropriate natural hazards reduce intensification opportunities.</p> <p>All remaining Neighbourhood Centres are sought to have a standard height limit of 14m to provide a scale commensurate</p>	<table border="1" data-bbox="1547 373 2002 727"> <tr> <td data-bbox="1547 373 1854 531"></td> <td data-bbox="1854 373 2002 531"><u>as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u></td> <td data-bbox="1854 531 2002 727"></td> </tr> <tr> <td data-bbox="1547 531 1854 727">ii.</td> <td data-bbox="1854 531 2002 727"><u>New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1</u></td> <td data-bbox="1854 531 2002 727"><u>14metres</u></td> </tr> </table> <p>Or in the alternative:</p> <p>15.5.2.2 Maximum building height</p> <p>a. The maximum height of any building shall be as follows:</p> <table border="1" data-bbox="1547 1002 2002 1318"> <thead> <tr> <th data-bbox="1547 1002 1599 1059"></th> <th data-bbox="1599 1002 1861 1059">Applicable to</th> <th data-bbox="1861 1002 2002 1059">Standard</th> </tr> </thead> <tbody> <tr> <td data-bbox="1547 1059 1599 1318">i</td> <td data-bbox="1599 1059 1861 1318"><u>Merivale, Church Corner and Sydenham North (Colombo Street between Brougham Street and Moorhouse Avenue)</u></td> <td data-bbox="1861 1059 2002 1318"><u>22 metres</u></td> </tr> </tbody> </table>		<u>as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u>		ii.	<u>New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1</u>	<u>14metres</u>		Applicable to	Standard	i	<u>Merivale, Church Corner and Sydenham North (Colombo Street between Brougham Street and Moorhouse Avenue)</u>	<u>22 metres</u>
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ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought															
				with the surrounding MRZ areas and to differentiate from the 12m height limit applying to Neighbourhood Centres.	<table border="1"> <tbody> <tr> <td data-bbox="1547 368 1599 635">ii</td> <td data-bbox="1599 368 1861 635">Ferrymead and all sites in a Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</td> <td data-bbox="1861 368 2002 635">20 metres</td> </tr> <tr> <td data-bbox="1547 635 1599 831">ii.</td> <td data-bbox="1599 635 1861 831">New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1</td> <td data-bbox="1861 635 2002 831">14 metres</td> </tr> <tr> <td data-bbox="1547 831 1599 906">i.</td> <td data-bbox="1599 831 1861 906">All sites in a District Centre</td> <td data-bbox="1861 831 2002 906">20 metres</td> </tr> <tr> <td data-bbox="1547 906 1599 1102">ii.</td> <td data-bbox="1599 906 1861 1102">Any building in a District Centre within 30 metres of an internal boundary with a residential zone</td> <td data-bbox="1861 906 2002 1102">12 metres</td> </tr> <tr> <td data-bbox="1547 1102 1599 1326">iii. i.</td> <td data-bbox="1599 1102 1861 1326">All sites in a Neighbourhood Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1.</td> <td data-bbox="1861 1102 2002 1326">12 metres</td> </tr> </tbody> </table>	ii	Ferrymead and all sites in a Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.	20 metres	ii.	New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1	14 metres	i.	All sites in a District Centre	20 metres	ii.	Any building in a District Centre within 30 metres of an internal boundary with a residential zone	12 metres	iii. i.	All sites in a Neighbourhood Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1.	12 metres
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161.	Neighbourhood Centre Zone – Built Form Standards	15.6.2.1 - Height	Support in part	<p>The increase in height of buildings from 8m to 12m is supported.</p> <p>Within the Central City, an increased height to 32m is the more appropriate, given these areas are surrounded by HRZ.</p>	<p>Amend rule 15.6.2.1 as follows:</p> <p>15.6.2.1 Maximum Building Height</p> <p>a. The maximum height of any building shall be as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Applicable to</th> <th>Standard</th> </tr> </thead> <tbody> <tr> <td>i.</td> <td>All sites unless specified below</td> <td>8 <u>12</u> metres</td> </tr> <tr> <td>ii.</td> <td><u>For sites within the Central City</u></td> <td></td> </tr> </tbody> </table>		Applicable to	Standard	i.	All sites unless specified below	8 <u>12</u> metres	ii.	<u>For sites within the Central City</u>	
	Applicable to	Standard												
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<u>located:</u> a. To the east of Barbadoes Street b. To the west of Barbadoes Street	20m 32m						
162.	Mixed Use Zone	15.10.1.1 Activity rules	Support in Part	<p>Support the enablement of residential in P27, subject to deletion of the 'Comprehensive Housing Precinct'.</p> <p>The rule framework does not enable the suite of community activities that are inherent in good quality mixed use neighbourhoods. The rule framework must enable activities such as preschools, education, spiritual, health, community facilities, and convenience retail to support the emergence of a genuinely mixed use neighbourhood. The activity standards for these activities in the MRZ are equally</p>	<ol style="list-style-type: none"> Amend P27 to delete clause (b) relating to the Comprehensive Housing Precinct. Add additional activity rules enabling a suite of community activities i.e. rules 14.5.1.1 P5-P13, P20. 		

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>appropriate and set appropriate limits on activity size to ensure effects of larger facilities are able to be assessed.</p> <p>Such activities do not generally give rise to retail distribution effects, and will not give rise to reverse sensitivity effects given the clear change in outcomes sought for these areas and the enablement of residential activity throughout the mixed use zone.</p>	
163.	Mixed Use Zone	15.10.2.1 - Height	Support in part	<p>The insertion of (b) providing for higher intensity of residential development is supported. However a height limit of 22m is considered the more appropriate for consistency with the height limits proposed within this submission, and appropriate levels of enablement, along with the unnecessary need to differentiate between the heights of buildings depending on where they are located on the site.</p>	<p>Amend rule 15.10.2.1 as follows:</p> <p>Maximum building height</p> <ol style="list-style-type: none"> a. The maximum height of any building shall be 15 metres, <u>unless specified below.</u> b. <u>The maximum height of any Comprehensive Residential Development located within the Comprehensive Housing Precinct (shown on the</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>planning maps) shall be 21 22 metres, for buildings located adjacent to the street, or 12 metres for buildings located at the rear of the site.</p>
164.	Mixed Use Zone – Comprehensive Residential Development	<p>15.10.1.1(P27)</p> <p>15.10.1.3 (RD3 / RD4) Comprehensive Residential Development</p> <p>15.10.2.9 Minimum Standards for Comprehensive Residential Development.</p> <p>15.14.3.40 Assessment Matters Comprehensive Redevelopment</p> <p>15.10.1.5(NC3)</p> <p>Appendix 15.15.12 – Sydenham and Appendix 15.15.13. Appendix 15.15.14</p>	Oppose	<p>These provisions are overtly complicated, unworkable and provide inappropriate mechanisms to manage development and acquire public laneways (Appendix 15.15.12 – Sydenham and Appendix 15.15.13).</p> <p>Clarity needs to be improved in (P27) that those provisions apply to all MUZ except:</p> <ul style="list-style-type: none"> (i) Blenheim Road / Main South Road 15.10.1.4(D1); and (ii) Comprehensive Housing Precinct (15.10.1.3 (RD3) and (RD4). 	<p>Delete all existing provisions and provide a suite of workable and clear rules that encourage and enable large scale redevelopment.</p> <p>Remove statutory impediments in Appendix 15.15.12 – Sydenham and Appendix 15.15.13 requiring ‘Greenways’ and ‘Shared Pedestrian / Cycleways’ and seek to facilitate through more appropriate means – such as negotiated purchase.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Reference in 15.10.1.3(RD3) to 15.14.3.40(a)(iv) and (v) is incorrect, as these provisions do not exist.</p> <p>The respective matters identified in relation to 15.10.1.3(RD4) are overly excessive and broad.</p> <p>15.10.1.5(NC3) has the statutory function of deeming all Comprehensive Residential Development within the precinct identified for such (at Appendix 15.15.12 and 15.15.13) non-complying. This inconsistency and error needs to be corrected.</p> <p>The matters expressed in 15.14.3.40 are overly excessive and broad (effectively not restricting the matters to be assessed), lack certainty of achievement, and are absent a resource management purpose. Collectively these matters are the antithesis of the achievement of Objective 3.3.1</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>and Objective 3.3.2 and will disenable investment and redevelopment. Reference is sought to be made to a good quality living environment that positively contributes to local amenity as a high quality environment is contextually unobtainable in a transitioning Mixed Use Environment.</p> <p>The requirements in Appendix 15.15.12 – Sydenham and Appendix 15.15.13. Appendix 15.15.14 are not the most appropriate in terms of s32 of the Act, and will act to disenable redevelopment and the purpose of the Zone.</p>	
165.	Central City Zone	15.11.1.1(P18) – Small buildings	Support	Support the introduction of a permitted pathway for small buildings where the built form rules and activity standards are sufficient to deliver acceptable urban design outcomes and the need for a separate urban design assessment/ consent is able to be avoided.	Retain P18 as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
166.	Central City Zone	15.11.1.2(C1)	Oppose	<p>Additions to C1 are not in accordance with the statutory requirements of the NPS-UD, Sections 77G or 77H of the Resource Management Act, nor Objective 3.3.1 and 3.3.2 of the Plan. The provisions would act as proxies to otherwise reduce development capacity.</p> <p>The Operative Plan controlled activity status for urban design assessments is sought to be retained.</p>	Delete proposed PC14 amendments to the rule i.e. retain the Operative Plan provision.
167.	Central City Zone Central City Mixed Use Zone	Residential Activity 15.11.1.3(RD4) Matters (b) and (c) 15.12.1.3(RD)(b) and (c)	Oppose	Additional controls are unnecessary and inappropriate. These matters are able to be addressed by existing matters (i.e 15.14.2.9(b) and 15.14.2.9(d).	<p>Amend the rule by deleting clauses (b) and (c) as follows:</p> <p>a. Residential activity in the Commercial Central City Business City Centre and Central City Mixed Use Zones – Rule 15.134.2.9</p> <p>b. Glazing – 15.14.3.37</p> <p>c. Outlook spaces – 15.14.3.38.</p>
168.	Central City Zone	Buildings 15.11.1.3(RD5)	Oppose	As a consequential amendment to the relief sought in this submission to delete various	<p>Amend rule by deleting clauses (m) and (n) as follows:</p> <p>m. Upper floor setbacks, tower</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought		
				built form rules, the activity status rule also needs amending to remove reference to rule breaches with the built form rules on wind, upper floor setbacks and tower dimension.	dimension and site coverage – Rule 15.14.3.35 n. – Wind – Rule 15.14.3.39		
169.	Central City Zone	Sunlight and Outlook for the street 15.11.2.3	Oppose	Acts as a proxy to limit development capacity in the Central City in a manner that is not founded in the NPS-UD Policy 3.	Delete rule		
170.	Central City Zone	Building Height – 15.11.2.11	Support in part	<p>There is an inconsistency between the definition of Building Base and the rule. The definition of Building Base is sought to be deleted, as it is internally inconsistent with provisions in the Plan and is uncertain in purpose.</p> <p>Building Base is defined as: <i>'In respect to the City Centre and Central City Mixed Use Zones, means any part of any building that is below the maximum permitted height for that type of building in the zone.'</i></p>	<p>1. Amend definition of Building Base as:</p> <p>Building Base: In respect to the City Centre and Central City Mixed Use Zones, means any part of any building that is below the maximum permitted height for that type of building in the zone.</p> <p>2. Amend rule as follows:</p> <table border="1" data-bbox="1547 1141 2002 1198"> <tr> <td>Applicable to</td> <td>Standard</td> </tr> </table>	Applicable to	Standard
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					<table border="1"> <tr> <td data-bbox="1547 373 1794 935"> i. All buildings, except as provided for in ii, and iii and iv below. </td> <td data-bbox="1794 373 2002 935"> A. The maximum height shall be <u>90 metres.</u> B. The maximum height of the building base shall be 28 metres. in accordance with the Central City Maximum Building Height planning map </td> </tr> <tr> <td data-bbox="1547 935 1794 1158"> ii. All buildings in <u>the heritage setting of New Regent Street as identified in Appendix 9.3.7.2.</u> </td> <td data-bbox="1794 935 2002 1158"> The minimum and maximum height shall be 8 metres. </td> </tr> <tr> <td data-bbox="1547 1158 1794 1331"> iii. All buildings at the Arts Centre, being land bordered by Montreal Street, </td> <td data-bbox="1794 1158 2002 1331"> The maximum height shall be 16 metres. </td> </tr> </table>	i. All buildings, except as provided for in ii, and iii and iv below.	A. The maximum height shall be <u>90 metres.</u> B. The maximum height of the building base shall be 28 metres. in accordance with the Central City Maximum Building Height planning map	ii. All buildings in <u>the heritage setting of New Regent Street as identified in Appendix 9.3.7.2.</u>	The minimum and maximum height shall be 8 metres.	iii. All buildings at the Arts Centre, being land bordered by Montreal Street,	The maximum height shall be 16 metres.
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171.	Central City Zone	Maximum Road Wall Height - 15.11.2.12 Building Tower Setbacks - 15.11.2.14 Maximum building tower dimension and building tower coverage – 15.11.2.15 15.11.2.16 Minimum building tower separation 15.11.2.17 Wind	Oppose	<p>These provisions, both individually and collectively act as proxies to restrict height and associated development capacity in the Central City Zone.</p> <p>The retention (and addition) of height rules in the City Centre zone simply does not give effect to the NPS-UD Policy 3 direction to “enable in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification.</p>	Delete all these provisions.		

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>The proposed wind standards are inappropriate (as set between 4m/s to 6m/s more than 5% annually at ground level within 100m of a proposal.) The Technical data used in support of the provision identifies that measured wind levels already typically exceed these levels without development. There is no supporting s32 considering the benefits and costs associated with this provision.</p> <p><i>“Christchurch is a relatively windy city with a background mean wind speed of about 4 m/s (at 10 m above the ground). At the airport for example, the mean wind speed exceeds 4 m/s about 45% of the time, exceeds 6 m/s about 21% of time, and exceeds 8 m/s about 11% of the time”.¹</i></p>	
172.	Central City Mixed Use Zone	15.12.1.1(P16)(a)(iii)	Oppose	Delete as this matter is appropriately managed through	Amend rule by deleting clause (a)(iii).

¹ Technical Advice for Wind Assessments for Christchurch Cit. Meteorology Solutions (2022). [Section 2. Context]

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				screening and controls in Rule 15.12.2.5 'Screening'	
173.	Central City Mixed Use Zone	15.12.1.1(P16)(c)(iii)	Oppose	Requirement is seen as excessive within this context as these areas are not necessarily mutually exclusive.	Amend rule by deleting clause (c)(iii).
174.	Central City Mixed Use Zone	15.12.1.1(P16)(j)	Oppose	This requirement is seen as excessive within this context as a higher density of residential activity should be encouraged, with standards for outdoor and communal living space being used to provide appropriate levels of amenity.	Amend rule by deleting clause (j).
175.	Central City Mixed Use Zone	15.12.1.3(RD2) – Buildings	Oppose	Additional matters of discretion associated with Upper Floor Setbacks, and Glazing are unnecessary and not the more appropriate provisions.	Amend rule by deleting clauses (k) upper floor setbacks and (l) glazing.
176.	Central City Mixed Use Zone	15.12.1.3(RD4) – Four or more residential units	Oppose	Matters of discretion associated with Upper Floor Setbacks, and Glazing are unnecessary and not the more appropriate provisions. The matters in 15.5.1 are considered	Amend rule by deleting clauses (b) outdoor living space and (c) glazing.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				appropriately broad to ensure an appropriate balance between private, communal and public amenity.	
177.	Central City Mixed Use Zone	15.12.2.1 'Street scene, landscaping and trees'	Oppose	The proposed landscaping requirements are excessive and inappropriately reduce development opportunities. The operative plan rule is sought to be retained and PC14 amendments deleted.	Delete PC14 amendments and retain operative plan rule.
178.	Central City Mixed Use Zone	15.12.2.2	Support in part	<p>The maximum height of 32m is supported as being appropriately enabling within a proximate distance to the City Centre Zone.</p> <p>The restrictions associated with the rule are opposed as being unnecessary, in conjunction with the absence of clarity in the definition associated with 'building base' as discussed in this submission.</p>	<p>Amend the rule as follows:</p> <p>15.12.2.2 Maximum building height</p> <p>a. The maximum height of any building shall be in accordance with the height specified <u>Unless identified on the Central City Maximum Building Height planning map the maximum height of any building shall be 32 metres.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>b. The maximum height of any building base shall be 17 metres.</p> <p>b. Any application arising from this rule shall not be limited or publicly notified.</p>
179.	Central City Mixed Use Zone	15.12.2.7 – Minimum setback from the boundary	Oppose	It is considered that the inserted requirements are unnecessary, and unduly constraining.	Delete PC14 amendments and retain operative plan rule.
180.	Central City Mixed Use Zone	15.12.2.9 – Minimum number of floors	Oppose	Whilst a minimum requirement of two floor levels is appropriate in the zone to increase intensity of development, the zone provides for a wide variety of uses, not all of which are appropriate in multi-storey buildings. As such single storey buildings may well be appropriate in a mixed use environment.	Delete proposed rule.
181.	Central City Mixed Use Zone	15.12.2.10 – Building Setbacks	Oppose	Requirements associated with internal setbacks between building towers is unnecessary.	Amend the rule by deleting clauses (b) and (c).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
182.	Central City Mixed Use Zone	15.12.2.11 – Building Tower Coverage	Oppose	Considered unnecessary and would inappropriate disenable development capacity for no sound resource management purpose.	Delete the rule.
183.	Central City Mixed Use Zone	15.12.2.12 – Glazing	Oppose	Considered unnecessary and would inappropriate disenable development capacity for no sound resource management purpose	Delete the rule.
184.	Central City Mixed Use Zone (South Frame)	15.12.1.1(P13)(a)(iii)	Oppose	Delete as this matter is appropriately managed through screening and controls in Rule 15.12.2.5 'Screening'	Amend the rule by deleting clause (a)(iii).
185.	Central City Mixed Use Zone (South Frame)	15.12.1.1(P13)(d)(iii)	Oppose	Requirement is seen as excessive within this context as these areas are not necessarily mutually exclusive.	Amend the rule by deleting clause (d)(iii).
	Central City Mixed Use Zone (South Frame)	15.12.1.1(P13)(f)(g)(j)	Oppose	Increasing the extent of setbacks is not more appropriate within this context, revert to the operative Plan rule.	<ol style="list-style-type: none"> 1. Amend the rule by retaining the operative Plan wording for clause (f). 2. Delete clauses (g) and (j).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Clause (j) is seen as excessive within this context as a higher density of residential activity should be encouraged, with standards for outdoor and communal living space being used.	
186.	Central City Mixed Use Zone – South Frame	15.13.1.3(RD4)	Oppose	Assessment matters for Glazing and Outdoor Space are excessive and appropriate matters are contained within Provision 15.14.2.10.	Amend the rule by deleting clauses (b) - glazing and (c) – outlook.
187.	Central City Mixed Use Zone – South Frame	15.13.1.3(RD5)	Oppose	Assessment matters for Upper floor setbacks and glazing are excessive.	Amend the rule by deleting clauses (l) – upper floor setbacks and (m) – glazing.
188.	Central City Mixed Use Zone – South Frame	15.13.2.1	Support in part	<p>The maximum height of 32m is supported as being appropriately enabling within a proximate distance to the City Centre Zone.</p> <p>The restrictions associated with is opposed as unnecessary, in conjunction with the absence of clarity in the definition associated with ‘building base’</p>	<p>Delete the rule and replace as follows:</p> <p><u>The maximum height of all buildings shall be 32m.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>as discussed in this submission.</p> <p>The provision as associated with notification is sought to be consistent with that associated with the Central City – Mixed Use zone.</p>	Retain clause (b).
189.	Central City Mixed Use Zone – South Frame	15.13.2.4(f) 'Street scene, landscaping and trees'	Oppose	The requirement for a minimum area of tree canopy of 4m ² is excessive and inappropriately, it reduces development opportunities.	Amend the rule by deleting the PC14 amendments and retaining the Operative Plan rule wording.
190.	Central City Mixed Use Zone – South Frame	15.13.2.10 – Building Tower Setbacks 15.13.2.11 – Building Tower Coverage 15.13.2.12 – Glazing	Oppose	Considered unnecessary and would reduce development capacity for no sound resource management purpose.	Delete rules 15.13.2.10 – tower setbacks, 15.13.2.11 – tower coverage, and 15.13.2.12 -glazing.
191.	Assessment Matters	15.14.3.1	Oppose	Additional assessment matters set out in clause (b) are unnecessary as the key issues are already addressed in clause (a), or are matters to be deleted	Delete clause (b), with the exception of clause (v) (subject to the below amendment): v. <u>The individual or cumulative</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				as a consequential amendment in association with the submission seeking the deletion of street wall, wind, and tower rules.	<u>effects of shading, visual bulk and dominance, and reflected heat from glass</u> on sites in adjoining residential zones or on the character, quality and use of public open space and in particular the <u>Ōtākaro Avon River corridor, Earthquake Memorial, Victoria Square and Cathedral Square</u> ;
192.	Assessment Matters	15.14.3.35 – Upper Floor Setbacks 15.14.3.36 – height in Central City Mixed Use Zone 15.14.3.37 Glazing 15.14.3.38 Outdoor Spaces 15.14.3.39 Wind 15.14.3.40 – Comprehensive Residential Development in the Mixed Use Zones 15.14.5.3 City Spine Transport Corridor	Oppose	Additional controls are unnecessary, subjective and overly broad. These matters are all addressed by Rule 15.14.2.6 'Urban Design'. Deletion of the assessment matters sought as a consequential amendment associated with the submission seeking the deletion of the upper floor setback rule.	Delete the following assessment matters: 15.14.3.35 – upper floor setbacks 15.14.3.36 – height in Central City Mixed Use Zone 15.14.3.37 Glazing 15.14.3.38 Outdoor Spaces 15.14.3.39 Wind 15.14.3.40 – Comprehensive Residential Development in the Mixed Use Zones 15.14.5.3 City Spine Transport Corridor

Appendix 2: Metropolitan Centre Zone Rules

The following Metropolitan Centre Zone Rules set out proposed amendments sought from Kāinga Ora to Plan Change 14, to incorporate rules to enable the classification of Hornby, Papanui and Riccarton as Metropolitan Centre Zones

Proposed changes in zoning are highlighted in dark blue.

MCZ - Metropolitan Centre Zone

The Christchurch Metropolitan Centres are commercial centres with a focal point as sub-regional centres of Papanui, Riccarton and Hornby. They have a planned urban built environment that reflects a high density built form with high-quality public spaces. The Metropolitan Centre Zone provides for a diverse range of commercial, retail, community and recreational activities and offers a variety of employment and living opportunities.

The Metropolitan Centre Zone implements the National Policy Statement on Urban Development, by enabling a built form and density that reflects demand for housing and business use in sub-regional centres.

Activities and buildings along identified active street frontages interact with the streets and public spaces and contribute to a vibrant and attractive metropolitan centre. New buildings and development are well designed and reflect the high-quality urban environment.

Objectives
<p>MCZ-O1 Purpose of the Metropolitan Centre Zone</p> <p>The Metropolitan Centre Zone:</p> <ol style="list-style-type: none"> 1. Is Christchurch's secondary commercial, civic and community centres; and 2. Accommodates a wide range of commercial, community, recreational and residential activities.
<p>MCZ-O2 Planned urban built environment of the Metropolitan Centre Zone</p> <p>The planned urban built environment of the Metropolitan Centre Zone is characterised by:</p> <ol style="list-style-type: none"> 1. A built form that is compact and reflects the high-density environment of the Metropolitan Centre; 2. A built environment that is versatile, well designed and of high quality and contributes to attractive and safe public spaces; and 3. An urban environment that is an attractive place to live, work and visit.
Policies
<p>MCZ-P1 Appropriate activities</p> <p>Enable activities that are compatible with the purpose of the Metropolitan Centre Zone.</p>
<p>MCZ-P2 Location of residential activity</p> <p>Enable residential activity where:</p> <ol style="list-style-type: none"> 1. It is located above ground floor; and 2. It provides for an ongoing active street frontage with a positive interface with the public space.
<p>MCZ-P3 Health and well-being for residential activity</p> <p>Ensure residential activity and residential units achieve a healthy urban built environment that provides for people's amenity and well-being in respect of:</p> <ol style="list-style-type: none"> 1. Access to sunlight, daylight and outdoor living space; and 2. Privacy and site design.

<p>MCZ-P4 Other activities</p> <p>Provide for other activities within the Metropolitan Centre Zone where:</p> <ol style="list-style-type: none"> 1. Any significant adverse effects, can be avoided, remedied or mitigated; and 2. The activity is consistent with the planned urban built environment and purpose of the zone.
<p>MCZ-P5 Inappropriate activities</p> <p>Avoid activities that are incompatible with the purpose of the Metropolitan Centre Zone.</p>
<p>MCZ-P6 Small scale built development</p> <p>Enable repairs, alterations and additions to existing buildings and structures, and the erection of smaller-scale buildings and structures, that achieve the planned urban built environment for the Metropolitan Centre Zone.</p>
<p>MCZ-P7 Larger scale built development</p> <p>Provide for high-density development that achieves a quality built form, taking into consideration the following design objectives and the planned urban built environment of the zone.</p> <ol style="list-style-type: none"> 1. Buildings are well-designed and contribute to a high-quality vibrant public realm through visual interest and aesthetic coherence achieved through façade design, materials, and active edges; 2. Buildings abut the street edge and define and enclose the streets, and define the edges of open space; 3. Street corners are legible and enhanced through architectural treatment and form and maximised activity; 4. Pedestrian amenity is maximised through good permeability and activation, which contributes to safety and walkability; 5. Servicing and parking are subservient to the built form to maximise an attractive and active pedestrian interface at the street edge; 6. Servicing plant is integrated within the architectural design, to avoid an ‘add on’ appearance and ensure a well-designed top to buildings; 7. Residential activity is provided with a high quality living environment, including access to privacy, outlook, and sun access; 8. Development responds to the positive contextual elements (existing and potential) including neighbouring buildings, elements such as trees and crossing points in the street
<p>MCZ-P8 Public space interface</p> <p>Where located along an active street frontage identified on the planning maps, require development to provide a positive interface with the public space through:</p> <ol style="list-style-type: none"> 1. Buildings that are built up to the front boundary of the site; 2. Continuous active street frontages; 3. Verandas or other forms of pedestrian shelter; 4. Transparent glazing on the ground floor that allows visibility into and out of commercial frontages and reflects whether it is a primary or secondary frontage; 5. Obvious and highlighted public entrances; and 6. Visually unobtrusive parking, storage and servicing areas, preferably within or to the rear of the building.
<p>MCZ-P9 Car parking and parking lots</p> <p>Only allow for ground level car parking and parking lots where:</p> <ol style="list-style-type: none"> 1. It is not located along a primary frontage identified on the planning maps; and

2. Any adverse effects on the amenity and quality of the streetscape and public open spaces can be minimised.

Rules

MCZ-R1 New buildings and structures, and alterations, repairs and additions to existing buildings and structures

1. Activity status: **Permitted**

Where:

- a. The gross floor area of the new building, structure or addition to an existing building or structure is no more than 450m²; and
- b. Compliance is achieved with:
 - i. MCZ-S1;
 - ii. MCZ-S2;
 - iii. MCZ-S4; and
 - iv. MCZ-S5.

Except that:

MCZ-S1, MCZ-S4 and MCZ-S5 do not apply to alterations and repairs to existing buildings and structures.

2. Activity status: **Restricted discretionary**

Where:

- a. Compliance is not achieved with MCZ-R1-1.a.

Matters of discretion are restricted to:

1. The matters in MCZ-P7.

Notification:

An application under this rule is precluded from being publicly and limited notified in accordance with sections 95A and 95B of the RMA.

3. Activity status: **Restricted discretionary**

Where:

- a. Compliance is not achieved with MCZ-R1-1.b.

Matters of discretion are restricted to:

1. The matters of discretion of the infringed standard.

Notification:

An application under this rule where compliance is not achieved with MCZ-S2, MCZ-S3, MCZ-S4, or MCZ-S5 is precluded from being publicly

	notified in accordance with section 95A of the RMA.
MCZ-R2	Construction activity 1. Activity status: Permitted
MCZ-R3	Retail activity 1. Activity status: Permitted
MCZ-R4	Commercial service activity 1. Activity status: Permitted
MCZ-R5	Office 1. Activity status: Permitted
MCZ-R6	Entertainment activity 1. Activity status: Permitted
MCZ-R7	Recreation activity 1. Activity status: Permitted
MCZ-R8	Gymnasium 1. Activity status: Permitted
MCZ-R9	Food and beverage outlet 1. Activity status: Permitted
MCZ-R10	Healthcare activity 1. Activity status: Permitted
MCZ-R11	Educational facility 1. Activity status: Permitted
MCZ-R12	Community facility 1. Activity status: Permitted
MCZ-R13	Visitor accommodation 1. Activity status: Permitted
MCZ-R14	Residential activity including Papakāinga/Kāinga Nohoanga 1. Activity status: Permitted Where: a. Compliance is achieved with: i. MCZ-S3.
	2. Activity status: Restricted discretionary

<p>Where:</p> <p>a. Compliance is not achieved with MCZ-S3.</p> <p>Matters of discretion are restricted to</p> <p>1. The matters of discretion of the infringed standard.</p> <p>Notification:</p> <p>An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</p>
<p>MCZ-R15 Social Housing Complex</p> <p>1. Activity status: Permitted</p>
<p>MCZ-R16 Community corrections activities</p> <p>1. Activity status: Permitted</p>
<p>MCZ-R17 Conservation activity</p> <p>1. Activity status: Permitted</p>
<p>MCZ-R18 Customary harvesting</p> <p>1. Activity status: Permitted</p>
<p>MCZ-R19 Large format retail activity</p> <p>1. Activity status: Permitted</p>
<p>MCZ-R20 Supermarket</p> <p>1. Activity status: Permitted</p>
<p>MCZ-R21 Emergency service facility</p> <p>1. Activity status: Restricted discretionary</p> <p>Matters of discretion are restricted to:</p> <p>1. The matters in MCZ-P4.</p> <p>Notification:</p> <p>An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</p>
<p>MCZ-R22 Retirement village</p> <p>1. Activity status: Restricted discretionary</p> <p>Matters of discretion are restricted to:</p> <p>1. The matters in MCZ-P4.</p>
<p>MCZ-R23 Parking lot</p> <p>1. Activity status: Restricted discretionary</p>

	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> The matters in MCZ-P9. <p>Notification: An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA</p>
	<p>MCZ-R24 Trade supplier</p> <ol style="list-style-type: none"> Activity status: Discretionary
	<p>MCZ-R25 Drive-through services</p> <ol style="list-style-type: none"> Activity status: Permitted
	<p>MCZ-R26 Any activity not otherwise listed as permitted, restricted discretionary, discretionary or non-complying</p> <ol style="list-style-type: none"> Activity status: Discretionary
	<p>MCZ-R27 Industrial activity</p> <ol style="list-style-type: none"> Activity status: Non-complying
	<p>MCZ-R28 Primary production</p> <ol style="list-style-type: none"> Activity status: Non-complying
	<p>MCZ-R29 Rural activities other than primary production</p> <ol style="list-style-type: none"> Activity status: Non-complying

Standards	
MCZ-S1 Height	
<ol style="list-style-type: none"> All buildings and structures must not exceed a maximum height above ground level of 53m. 	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> The location, design and appearance of the building or structure; Loss of sunlight to adjacent public space; Shading to surrounding buildings; Shading and loss of privacy for any adjacent residential activity; Wind effects on the safety and amenity of the adjacent public space; The planned urban built environment; and Whether an increase in building height results from a response to natural hazard mitigation.
MCZ-S2 Active street frontages	
<ol style="list-style-type: none"> Along building lines identified on the planning maps all buildings must be built up to and oriented towards the identified building line and provide a veranda that: 	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> Whether the building promotes a positive interface with the street, community safety and visual interest; Whether the building incorporates landscaping or other means to provide

<ul style="list-style-type: none"> a. Extends along the entire length of the building frontage; b. Provides continuous shelter with any adjoining veranda; and c. Has a minimum setback of 500mm from any kerb face. <p>2. For sites with primary street frontage controls identified in the planning maps:</p> <ul style="list-style-type: none"> a. At least 55% of the ground floor building frontage must be display windows or transparent glazing; and b. The principal public entrance to the building must be located on the front boundary. <p>3. For sites with secondary street frontage controls identified in the planning maps at least 35% of the ground floor building frontage must be display windows or transparent glazing.</p>	<p>increased amenity, shade and weather protection; and</p> <p>3. Whether topographical or other site constraints make compliance with the standard impractical.</p>
<p>MCZ-S3 Location of residential units</p>	
<p>1. All residential units must be located above ground floor.</p>	<p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> 1. The amenity and quality of the streetscape; 2. Whether the location of the residential units promote on the an active frontage, community safety and visual interest at the pedestrian level; and 3. Whether the design could facilitate conversion to commercial use so as not to foreclose future options.
<p>MCZ-S4 Location of parking</p>	
<p>1. Any on-site ground level car parking must be located within or at the rear of the building that it serves.</p>	<p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> 1. The amenity and quality of the streetscape.

MCZ-S5 Service areas and outdoor storage	
<p>1. Any on-site service area, including rubbish collection areas, and area for the outdoor storage of goods or materials must:</p> <ul style="list-style-type: none"> a. Be located to the rear of the building; and b. Without preventing the provision of a gate or entry point to the site, be fully screened by a 1.8m high fence or landscaping where it is visible from the road or any other public space. 	<p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> 1. The amenity and quality of the streetscape or public space; and 2. The service and storage needs of the activity.

Appendix 3: Maps

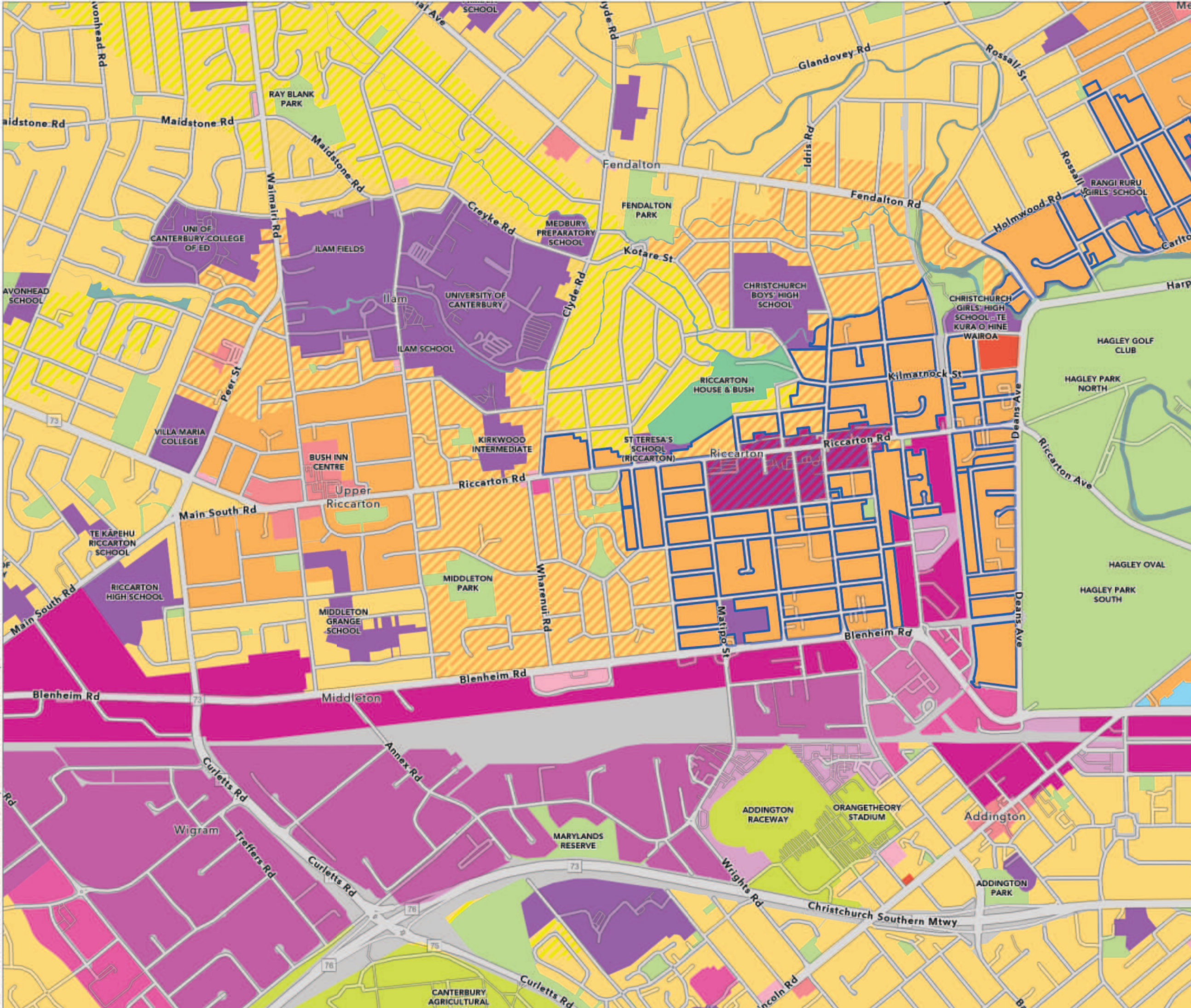
The following maps set out the height amendments sought from Kāinga Ora to Plan Change 14.

Noting that changes to the Residential Suburban and Residential Transition Zone and including the Lyttleton Port Residential Zone has not been shown here.



Christchurch City Council Plan Change 14 Kāinga Ora Submission Riccarton

- Kāinga Ora Proposed HVC**
 [Blue outline] Height Variation Control - 36m
- Kāinga Ora Proposed Zoning**
- [Purple] Metropolitan Centre Zone
 - [Orange] High density residential zone
 - [Yellow] Medium density residential zone
- PC14 Zoning**
- [Light Blue] Central City Mixed Use Zone
 - [Orange] High density residential zone
 - [Pink] Large format retail zone
 - [Red] Local centre zone
 - [Yellow] Medium density residential zone
 - [Magenta] Mixed use zone
 - [Light Pink] Neighbourhood centre zone
 - [Dark Red] Town centre zone
 - [Grey] Transport
 - [Dark Purple] Specific Purpose
 - [Pink] Industrial General
 - [Purple] Industrial Heavy
 - [Red] Residential Guest Accommodation
 - [Yellow] Residential Medium Density
 - [Light Yellow] Residential Suburban
 - [Orange] Residential Suburban Density Transition
 - [Light Green] Open Space Community Parks
 - [Green] Open Space Metropolitan Facilities
 - [Dark Green] Open Space Natural
 - [Teal] Open Space Water and Margins
 - [Light Purple] Commercial Office



This map contains data derived in part or wholly from sources other than Kāinga Ora, and therefore, no representations or warranties are made by Kāinga Ora as to the accuracy or completeness of this information. Contains information sourced from Hastings District Council, Hawke Bay Regional Council, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS. Map intended for distribution as an A3 PDF document.



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Client	Kāinga Ora
Discipline	GIS
Drawing No.	GIS-7774461-CCPC14-01



Christchurch City Council Plan Change 14 Kāinga Ora Submission Hornby

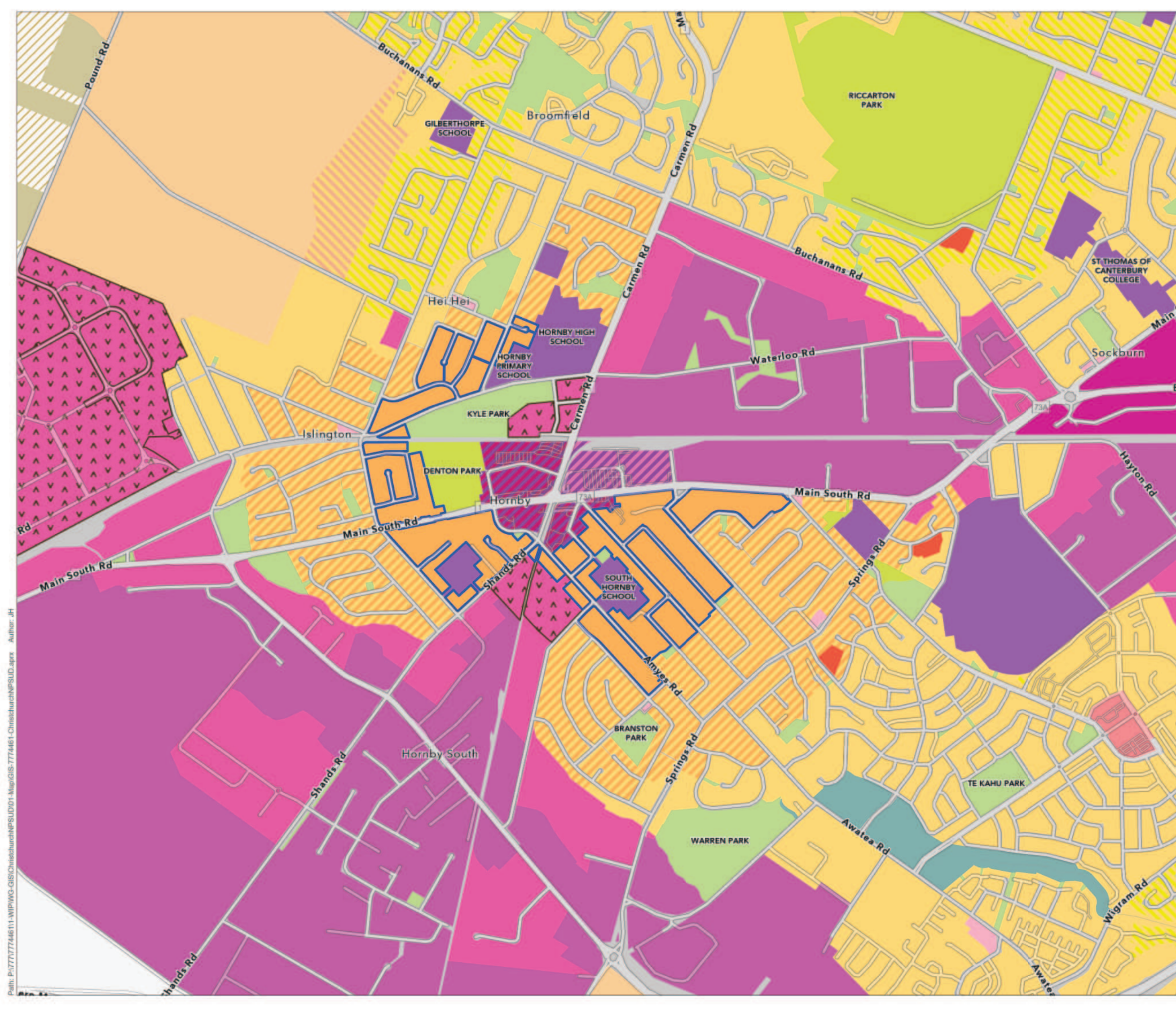
- Kāinga Ora Proposed HVC**
 [Blue outline] Height Variation Control - 36m
- Kāinga Ora Proposed Zoning**
 [Purple diagonal lines] Metropolitan Centre Zone
 [Orange diagonal lines] High density residential zone
 [Yellow diagonal lines] Medium density residential zone
- PC14 Zoning**
 [Light orange] Future Urban Zone
 [Orange] High density residential zone
 [Pink] Large format retail zone
 [Light pink] Local centre zone
 [Yellow] Medium density residential zone
 [Magenta] Mixed use zone
 [Light magenta] Neighbourhood centre zone
 [Dark magenta] Town centre zone
 [Grey] Transport
 [Dark purple] Specific Purpose
 [Light purple] Industrial General
 [Dark purple] Industrial Heavy
 [Purple] Industrial Park
 [Light green] Rural Quarry
 [Light green with diagonal lines] Rural Quarry or Open Space Community Parks (Templeton)
 [Light orange] Rural Urban Fringe
 [Red] Residential Guest Accommodation
 [Yellow] Residential Suburban
 [Orange] Residential Suburban Density Transition
 [Light green] Open Space Community Parks
 [Light green] Open Space Metropolitan Facilities
 [Teal] Open Space Water and Margins
 [Light yellow] Residential New Neighbourhood
- Precinct**
 [Black outline] Brownfield Precinct

This map contains data derived in part or wholly from sources other than Kāinga Ora, and therefore, no representations or warranties are made by Kāinga Ora as to the accuracy or completeness of this information. Contains information sourced from Hastings District Council, Hawke Bay Regional Council, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS. Map intended for distribution as an A3 PDF document.



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 Author: JH



12th May 2023

Attn: Mark Stevenson
Planning Manager
Christchurch City Council
Po Box 73016
Christchurch

Submission lodged via email: engagement@ccc.govt.nz

**KĀINGA ORA – HOMES AND COMMUNITIES SUBMISSION ON A NOTIFIED
PROPOSAL FOR PLAN CHANGE 14 UNDER CLAUSE 6 OF SCHEDULE 1 OF THE
RESOURCE MANAGEMENT ACT 1991**

This is a submission on Plan Change 14 – Housing and Business Choice (“PC14”) from Christchurch City Council (“the Council” on the Operative Christchurch District Plan (“the Plan”).

Kāinga Ora does not consider it can gain an advantage in trade competition through this submission. In any event, Kāinga Ora is directly affected by an effect of the subject matter of the submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

The specific provisions of the proposal that this submission relates to:

PC14 in its entirety.

This document and the appendices attached is Kāinga Ora submission on PC14.

The Kāinga Ora submission is:

1. Kāinga Ora Homes and Communities (“Kāinga Ora”) is a Crown Entity and is required to give effect to Government policies. Kāinga Ora has a statutory objective that requires it to contribute to sustainable, inclusive, and thriving communities that:
 - a) Provide people with good quality, affordable housing choices that meet diverse needs; and
 - b) Support good access to jobs, amenities and services; and
 - c) Otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
2. Because of these statutory objectives, Kāinga Ora has interests beyond its role as a public housing provider. This includes a role as a landowner and developer of residential housing and as an enabler of quality urban developments through increasing the availability of build-ready land across the Canterbury Region, including Christchurch City.
3. Kāinga Ora therefore has an interest in both PC13 and PC14 and how they:
 - a) Gives effect to the National Policy Statement on Urban Development (“**NPS-UD**”) and The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (“**the Housing Supply Act**”);
 - b) Minimises barriers that constrain the ability to deliver housing development across public housing, affordable housing, affordable rental, and market housing; and
 - c) Provides for the provision of services and infrastructure and how this may impact on the existing and planned communities, including Kāinga Ora housing developments.
4. Kāinga Ora supports the general direction and intent of Plan Change 14, especially to the extent that this suite of plan changes is more enabling of residential and business development capacity compared to the Christchurch City Council Operative District Plan.

In particular, Kāinga Ora supports:

- a) The recognition of the need for well-functioning urban environments (consistent with the direction set out in the National Policy Statement on Urban Development 2020 (“**NPS-UD**”));
 - b) The provision of medium density housing in most existing residential areas across the city, which is consistent with the requirements of the Resource Management (Enabling Housing Supply) Amendment Act 2021 (“**the Amendment Act**”);
 - c) The recognition of the need to provide sufficient development capacity to meet long term demands for housing and business land;
 - d) The need to manage significant risks from natural hazards;
 - e) The promotion of a compact urban form and residential intensification in Christchurch City;
 - f) The provision for enabling medium to high density residential development within a walkable catchment of the City Centre and larger Commercial Centres; and
 - g) The provision of a range of commercial and mixed-use environments which will provide for and support urban development across Christchurch City.
5. The Kāinga Ora submission seeks amendments to PC14 in the following topic areas:

Qualifying Matters

- a) Kāinga Ora could support the qualifying matters, subject to amendments and clarifications as sought in the submission with the exception of: Low Public Transport Accessibility, Key Transport Corridors, Sunlight Access, Residential Heritage Areas, Character Areas, the Christchurch International Airport Noise Influence Area, Industrial Interfaces, and Open Space Areas which are opposed in full by Kāinga Ora for the reasons included in **Appendix 1**.
- b) Kāinga Ora considers that qualifying matters need to be expressed more clearly across PC13 and PC14 to assist with plan administration and interpretation. For example, having some of the Heritage Area provisions being contained in PC14 and following an IPI process i.e. the built form standards. Whilst other Heritage Area provisions are being progressed through a separate PC13, and following a first schedule process i.e. Heritage Area policies has created efficiency issues.

- c) Kāinga Ora opposes the proposed introduction of certain new qualifying matters through the IPI process because doing so in this instance (having regard to the nature of the particular qualifying matters concerned) goes beyond the scope of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. The concerns about the use of the IPI process for this purpose was highlighted in the recent Environment Court's decision of *Waikanae Land Company Limited v Heritage New Zealand Pouhere Tāonga [2023] NZEnvC 056*. As noted in that case, if a Council wishes to implement other changes to its district plan, then there is the usual First Schedule process that can be adopted, with that process containing the appropriate safeguard of a full appeal to the Environment Court.

Residential Heights

- d) Kāinga Ora supports the application of a Medium Density Residential Zone (MRZ) across all relevant residential zones. It also supports the introduction of High Density Residential Zone (HRZ) around the edge of the City Centre and where located in close proximity to larger commercial centres. The extent of HRZ is sought to be increased in the Riccarton area given the scale of the Riccarton commercial centre and proximity to the University of Canterbury activity hub. In addition to the increased spatial extent of HRZ being sought, Kāinga Ora submits that the heights and centre hierarchy be simplified, with greater enablement of taller buildings provided.
- e) Further to this, Kāinga Ora seeks that a Height Variation Control overlay of 36m be applied 1.20km from the edge of the City Centre Zone and the three Metropolitan Centre Zones as sought below.

Metropolitan Centre Zoning

- f) Kāinga Ora seeks the introduction of a new 'Metropolitan Centre Zone (MCZ) in the Plan to replace the Riccarton, Papanui, and Hornby Town Centre Zones to recognise the broader catchment these centres serve, both currently and to account for future growth of the residential catchment. The existing size, scale and function of these centres are such that they merit the application of a MCZ classification, with appropriate objectives, policies and rules framework. A MCZ chapter is sought and is attached in **Appendix 2**. Further, recent and proposed investment in public and active transport modes along the corridors in which these activity centres are located, support the case for a zoning classification reflective of their relative position within the centres hierarchy.

Industrial Interface, Industrial General, and Commercial Mixed Use proposals

- g) Kāinga Ora submits that the Industrial Interfaces qualifying matter and associated policies, and rules are deleted, and that the purported effects are managed, where necessary through noise controls and acoustic and ventilation requirements as opposed to the proposed density controls.
- h) In reviewing the locations that the Industrial Interface qualifying matter applies in the preparation of this submission, Kāinga Ora notes that the current function of many industrial general zone areas, that are located in primarily residential areas, would no longer meet a definition of 'industrial activity'. Kāinga Ora question if this zoning may no longer be appropriate for these locations and if an application of a commercial mixed use zone may be more appropriate; as has been proposed in PC14 for Sydenham.
- i) Similarly, in relation to the rules that have been proposed in commercial mixed use zone boundary changes in areas adjacent to the central city i.e. Sydenham and Phillipstown, Kāinga Ora express concern that the approach taken will not achieve the outcomes sought. Kāinga Ora proposes that the existing zoning remains and a schedule 1 process is followed, including structure planning and use of appropriate planning methods. This may also provide the Council with opportunities to support these changes through the Long Term Plan.

General Feedback

- j) Kāinga Ora submits that changes to policies, rules and matters of discretion are necessary to better reflect the requirements and intent of the 'the Housing Supply Act' and NPS-UD. Kāinga Ora considers that PC14 is not currently appropriately framed to recognise that as the character of planned urban areas evolves to deliver a more intensive and compact urban form, amenity values will change. Amendments are sought to ensure this is reflected more consistently throughout the provisions, in language that is consistent with the NPS-UD.
- k) The Kāinga Ora submission seeks changes to rules to address errors, to align with Schedule 3A of the Housing Supply Act, or to reduce duplication where the standards introduced via Schedule 3A overlap with District Plan provisions that are not proposed to be deleted.

- l) The Kāinga Ora submission seeks amendments to objectives, policies, rules and matters for discretion / assessment criteria - for improved clarity, effectiveness and focus on the specific resource management issue / effect to be addressed. Further, The scope and extent of assessment matters provide such broad discretion that they undermine the 'Housing Supply Act's' intent of a restricted discretionary activity status.
 - m) The submission seeks such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission above and in **Appendix 1**.
6. The changes requested are made to:
- a) Ensure that Kāinga Ora can carry out its statutory obligations;
 - b) Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991;
 - c) Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development;
 - d) Provide clarity for all plan users; and
 - e) Allow Kāinga Ora to fulfil its urban development functions as required under the Kāinga Ora–Homes and Communities Act 2019.
7. The Kāinga Ora submission points and changes sought can be found within Table 1 of Appendix 1 which forms the bulk of the submission.
8. A Metropolitan Centre Zone chapter is sought and included in **Appendix 2**.
9. Mapping changes sought are included in **Appendix 3**.

Kāinga Ora seeks the following decision from Christchurch City Council:

That the specific amendments, additions or retentions which are sought as specifically outlined in this letter and **Appendix 1-3**, are accepted and adopted into PC14, including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Kāinga Ora wishes to be heard in support of their submission.

Kāinga Ora seeks to work collaboratively with the Council and wishes to discuss its

submission on PC14 to address the matters raised in its submission.

A handwritten signature in black ink, appearing to be 'BL', written over a horizontal dotted line.

Brendon Liggett

Development Planning Manager

Kāinga Ora – Homes and Communities

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Appendix 1: Decisions sought on PC14

The following table sets out the amendments sought to the PC14 and also identifies those provisions that Kāinga Ora supports.

*Proposed changes are shown as **strikethrough** for deletion and **underlined** for proposed additional text.*

Table 1

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
Zone Boundaries/ Mapping					
1.		Planning maps	Support in Part	<p>Kāinga Ora support the implementation of a Medium Density Residential Zone (MRZ) over all relevant residential zones. As set out in this submission, Kāinga Ora oppose the Public Transport Accessibility Qualifying Matter (QM) and the Airport Noise Influence Area QM and therefore seek as a consequence of deleting these QMs that the RS and RSDT zoned areas within these QMs be rezoned to MRZ.</p> <p>Kāinga Ora note some ambiguity in the provisions as to whether the land that is subject to the Tsunami Risk QM is intended to be zoned MRZ or RS/ RSDT. Whilst agreeing that a high risk of natural hazards is a legitimate QM, our</p>	<ol style="list-style-type: none"> 1. Retain MRZ over areas where MRZ is proposed in PC14 as notified unless otherwise changed by this submission. 2. Rezone to MRZ areas that are proposed as RS/ RSDT zones under the Public Transport Accessibility and Airport Noise Influence Area QMs. 3. Rezone Lyttelton to MRZ. 4. Rezone Papanui, Riccarton and Hornby Key Activity Centres to Metropolitan Centre Zone (MCZ) from Town Centre Zone and Large Format Retail Zone. 5. Rezone to HRZ areas that are proposed as MRZ within a Local Centre Intensification Precinct and remove the precinct. 6. Retain HRZ over areas where HRZ is proposed in PC14 as notified unless otherwise changed by this submission.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>submission raises concerns with whether the costs and benefits of this QM strike an appropriate balance, and question the appropriateness of using a threshold of a 1:500 year event plus a 1m rise in sea levels as the mapping base. Use of a lower density RS/ RSDT zoning should only be used where the risk of hazards is proven to be high and with a high return period.</p> <p>The areas subject to the 'Local Centre Intensification Precinct' are sought to be rezoned from MRZ to HRZ and the precinct overlay deleted. These areas are ideally located adjacent to medium-sized commercial centres that provide residential activities with easy access to a wide range of services and are also generally well serviced by public transport. As such, a HRZ is considered to be more appropriate and better aligned</p>	<p>7. Remove the Large Local Centre Intensification Precinct and replace with HDZ.</p> <p>8. Extend the boundary of HRZ in the Riccarton area as shown in the maps attached to this submission in Appendix 3.</p> <p>9. Delete the various height/intensification precincts and replace with a single 'Height Variation Control' precinct to reflect the 36m height limit sought in the submission for the HRZ adjacent to the City Centre, Hornby, Riccarton, and Papanui centres as shown in the maps attached to this submission within Appendix 3.</p> <p>Generally these are:</p> <ul style="list-style-type: none"> - 22m HDZ 1.20km from the edge of the new MCZ and the CCZ. - 36m Height Variation Overlay 400m from the edge of the new MCZ and CCZ.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>with NPS-UD and National Planning Standard outcomes.</p> <p>Kāinga Ora submits that Metropolitan Centres be employed within the centres hierarchy. Kāinga Ora seeks that this covers the existing key activity areas for Riccarton, Papanui, and Hornby.</p> <p>Kāinga Ora support the inclusion of a HRZ in appropriate locations close to the City Centre, Metropolitan and larger suburban commercial centres. The zone boundaries for the HRZ is supported, with the only exception being in the Riccarton area where an extension of the HRZ boundaries are sought to better recognise the proximity of this area to a wide range of commercial services, university activity node, high frequency public transport, cycle ways, and the relief sought in the submission opposing the</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Riccarton Bush, Industrial Interface, Airport Influence Density Precinct, and Piko/Shands heritage area and character area QMs. Noting also the recommendation that Kāinga Ora has suggested in relation to amendments to the Industrial General Zoning at 247 Riccarton Road and 37 Euston Street.</p> <p>Kāinga Ora seeks to rationalise and simplify the height limits applicable to the HRZ, depending on the size of the adjacent commercial centre. Consequential amendments are therefore required to the various height/ intensification precincts to reflect the outcomes sought in the submission.</p>	
Chapter 3 - Strategic Directions					

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
2.	3.3	Objective 3.3.3 – Ngāi Tahu mana whenua	Support in Part	<p>The proposed amendment to clause (a)(ii) is supported.</p> <p>This objective is sought to also include explicit reference to enabling the ability of mana whenua to establish Papakāinga/Kāinga Nohoanga as an important tool in meeting their well-being and prosperity as sought in the amendment.</p>	<p>1. Amend clause (a)(ii) as follows:</p> <p>Ngāi Tahu mana whenua's aspirations to actively participate priorities for their well-being and prosperity are recognised and provided for in the revitalisation of Ōtautahi, including the provision of Papakāinga/Kāinga Nohoanga are recognised; and</p>
3.	3.3	Objective 3.3.4 – Housing bottom lines and choice	Support	Support the proposed reference to Papakāinga/Kāinga Nohoanga as a new clause (b)(ii).	Retain clause (b)(ii) as notified.
4.	3.3	Objective 3.3.7 – Well functioning urban environment	Support in Part	<p>Clause (a) implements legislative requirements and is supported. The balance of the objective is likewise supported, with the exception of clause (a)(i)(A) which confuses urban form with landscape outcomes and adds little meaningful value to the objective.</p> <p>Clause (a)(E)(iii) relating to mana whenua must include</p>	<p>2. Retain the objective as notified, except for:</p> <p>Delete clause (a)(i)(A) Contrasting building clusters within the cityscape and the wider perspective of the Te Poho-o-Tamatea/the Port Hills and Canterbury plains; and</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>explicit reference to Papakāinga/Kāinga Nohoanga.</p> <p>It is noted that the clause numbering/ formatting is unclear.</p>	<p>Amend clause (a)(E)(iii) as follows:</p> <ol style="list-style-type: none"> The cultural traditions and norms of Ngāi Tahu mana whenua, <u>including the provision of Papakāinga/Kāinga Nohoanga</u> Update clause numbering.
5.	3.3	Objective 3.3.8 – Urban growth, form and design	Support in Part	<p>In line with our submission raising concerns that the proposed character area QM does not meet s32 requirements, in the event that the character area provisions are deleted, then existing clause (a)(ii) is also sought to be deleted.</p> <p>Similarly in line with our submission raising consistency of heights in local centres, and in line with concerns of the public transport access qualifying matter clause (a)(iv.)(A) is sought to be amended. The other amendments sought in PC14 to this objective are supported.</p>	<ol style="list-style-type: none"> Retain objective as notified, except for the deletion of existing clause (a)(ii): <u>Has its areas of special character and amenity value identified and their specifically recognised values appropriately managed; and</u> Amend clause (a)(iv.)(A) as follows: <u>in and around the Central City, Key Activity Centres (as identified in the Canterbury Regional Policy Statement), Town Centre, and larger Local neighbourhood</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<u>centres, and nodes of core public transport routes; and</u>
6.	3.3	Objective 3.3.10 – Natural and cultural environment	Oppose	In line with our submission seeking the deletion of the tree canopy financial contribution rules, the related proposed reference to tree canopy in the strategic objectives is also opposed.	Delete proposed clause (a)(ii)(E): Tree canopy cover in areas of residential activity that maintains and enhances the city's biodiversity and amenity, sequesters carbon, reduces stormwater runoff, and mitigates heat island effects; and
7.	3.3	Objective 3.3.13 - Infrastructure	Oppose	In line with our submission seeking the deletion of the Airport Influence Density Precinct and our concern that the Qualifying Matter does not meet s32 requirements, amend Clause (b).(iii.)	Delete clause (b).(iii.).
Chapter 6 – Qualifying Matters					
8.	Sites of Ecological Significance	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards	Support	Kāinga Ora support the Sites of Ecological Significance, the Outstanding and Significant Natural Features, and the Sites of Cultural Significance qualifying matters, noting these	<ol style="list-style-type: none"> 1. Retain the Sites of Ecological Significance qualifying matter. 2. Retain the Outstanding and Significant Natural Features qualifying matter.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	<ul style="list-style-type: none"> • Outstanding Natural Features and Landscapes • Sites of Cultural Significance (Wāhi Tapu / Wāhi Taonga, Ngā Tūranga Tūpuna, Ngā Wai and Belfast Silent File) 	<p>and/or intensification enabled under Policy 3.</p> <p>9.1.4.1.1 P1 Indigenous vegetation clearance.</p> <p>9.1.4.1.3 RD3 – RD6 Indigenous vegetation clearance.</p> <p>9.1.4.1.5 NC1 and NC3 Indigenous vegetation clearance.</p> <p>8.5.1.3 RD11 Subdivision of land.</p> <p>8.9.2.3 RD5 Earthworks.</p> <p>9.2.4.1 Table 1(a) – (d), (i), (o) – (s) Outstanding natural features and landscapes.</p> <p>9.5.4.1.3 RD3 – RD6 Wāhi Tapu / Wāhi Taonga.</p>		<p>are all relevant matters of national significance in Section 6.</p> <p>It is also noted that there is very little overlap between Sites of Ecological Significance and Outstanding Natural Features and Landscapes with existing residential zones.</p>	<p>3. Retain the Sites of Cultural Significance qualifying matter.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		8.5.1.3 RD11 Subdivision of land. 8.9.2.3 RD5 Earthworks.			
9.	Slope Hazard Areas	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3. 5.6.1 Slope Instability Management Area	Support	Kāinga Ora support the management of significant risks from natural hazards as a qualifying matter (in appropriate circumstances), noting that it is a matter of national significance in Section 6. As slope hazards are less dynamic and have greater certainty as to their risk over time than flooding (submitted on below) and are not subject to constant change through hazard mitigation works, Kāinga Ora supports the Slope Hazard Areas qualifying matter.	Retain the Slope Hazard Areas qualifying matter.
10.	High Flood Hazard Management Area	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards	Support in Part	Kāinga Ora supports a risk-based approach to the management of natural hazards, however, opposes the inclusion of further hazard	1. Amend the provisions to remove / delete the mapped Hazard Management Areas from within the District Plan and instead hold this information in non-statutory GIS maps.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	<p>Coastal Hazard Management Areas</p> <p>Tsunami Management Area</p>	<p>and/or intensification enabled under Policy 3.</p> <p>5.4.5 Flood Ponding Management Areas</p> <p>5.4.6 High Flood Hazard Management Areas</p> <p>5.2.2.5.1 Managing development in Qualifying Matter Coastal Hazard Management Areas 5.4A.1 – 5.4A.6 Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area.</p> <p>5.2.2.5.2 Managing development within the Qualifying Matter Tsunami Management Area</p> <p>5.4A.1 – 5.4A.6 Rules – Qualifying Matter Coastal Hazard Management Areas</p>		<p>areas within the maps as part of the District Plan.</p> <p>Including Flood Hazard Areas in the District Plan ignores the dynamic nature of such hazards. Kāinga Ora accepts that it is appropriate to include rules in relation to these hazards but seeks that the rules are not linked to static maps.</p> <p>Other councils across the country adopt a set of non-statutory hazard overlay maps which operate as interactive maps on the respective Council's 'Geo Maps' website – a separate mapping viewer to the statutory maps. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 process under the RMA. Kāinga Ora notes that there is no formal requirement for hazard</p>	<ol style="list-style-type: none"> 2. Reduce the Tsunami Management Area to a 1:100 year hazard. 3. Amend and make consequential changes to give effect to this submission.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		and Qualifying Matter Tsunami Management Area		<p>maps to be included within a district plan.</p> <p>Kāinga Ora also has concerns that the proposed policy approach relating to the Tsunami Management Area is too conservative, noting that Policy 24 of the NZCPS requires identification of areas in the coastal environment that are potentially affected by coastal hazards (including tsunami) over at least 100 years.</p> <p>Kāinga Ora also considers that the Council's intent to retain Residential Suburban / Residential Suburban Density Transition zoning in the Tsunami Management Area is disproportionate based on the modelled return period.</p>	
11.	Historic Heritage, Residential Heritage Areas, and Residential	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium	Support Historic Heritage.	Kāinga Ora generally supports the protection of areas of historic heritage where the requirements of Section 6 of the Resource Management Act	Delete the Residential Heritage Area qualifying matter and all proposed provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	Heritage Area Interface.	Density Residential Standards and/or intensification enabled under Policy 3. 14.5.3.2.3 Building height - Residential Heritage Areas. 14.5.3.2.7 Number of Residential Units Per Site - Residential Heritage Areas. 14.5.3.2.8b, 8c Setbacks - Residential Heritage Areas. 14.5.3.2.9 Building Coverage - Residential Heritage Areas. 14.5.3.2.10c Outdoor living space - Residential Heritage Areas.	Oppose Residential Heritage Areas.	<p>1991 ('RMA' or 'the Act') are met. However, Kāinga Ora opposes the new proposed Heritage Areas ('HAs') that are sought to be introduced under PC13 and PC14 in their entirety.</p> <p>Kāinga Ora does not consider that the proposed HAs meet the requirements of Section 6 of RMA to the extent that they should be accorded 'historic heritage' status of 'national' significance.</p> <p>Therefore, if these areas are considered to manage character (s7 RMA), rather than protect heritage, Kāinga Ora considers that a more nuanced assessment of costs and benefits applies to areas with a high proportion of Kāinga Ora housing, such as the proposed Piko/Shands character and heritage areas (i.e. the benefits of providing a greater number of houses for the most vulnerable members of society,</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>particularly in an area that has historically been used for social housing, are greater than retaining the character associated with existing housing per se, and therefore the character or heritage values of such locations must be carefully weighed to test the heritage values are existent and sufficiently so that they outweigh the social costs of lost development opportunity. We do not believe this test has been met.</p> <p>A more nuanced assessment of costs and benefits is likewise required for heritage areas in locations that are otherwise ideally located for further intensification, such as the heritage areas within and adjacent to the central city/ Four Avenues. Piko/ Shands is located in close proximity to both Riccarton and Church Corner commercial centres as well as an emerging high frequency public transport</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>corridor along Riccarton Road and a new major cycle way network. Were it not for the heritage and character area overlays, the Piko/ Shands area would merit a High Density zoning/ height limits.</p> <p>The imposition (costs) of character controls in locations that would otherwise suit high density housing must therefore be greater than the costs applying to character areas more generally. It follows that the benefits of such regulation and the identification of these areas as Qualifying Matters must therefore be greater than the benefits generally in order to justify additional regulation.</p> <p>It is further noted that having some of the Heritage Area provisions being contained in PC14 and following an IPI process i.e. the built form standards, and other Heritage Area provisions being progressed through a separate</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>PC13, and following a first schedule process i.e. Heritage Area policies has created efficiency issues.</p> <p>Consistency is sought with the Kāinga Ora submission on Plan Change 13 (“PC13”), which Kāinga Ora opposed the approach of establishing ‘Historic Heritage Areas’ in its entirety.</p> <p>Kāinga Ora is seeking the spatial application of residential zones to be applied across the City, regardless of the nature and extent of the current and proposed ‘Heritage Areas’ set out by Council in PC13. Kāinga Ora seeks the deletion of any proposed changes in PC14 that seek amendments to historic heritage and special character, consistent with the relief sought in PC13.</p> <p>Kāinga Ora considers that the proposed changes across PC13 and PC14 are not</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				qualifying matters, as the assessments in its view, do not meet the requirements under s6, s77I, s77J, s77K, and/or s77L of the RMA.	
12.	Significant and Other Trees (excluding those not identified as Qualifying Matters).	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>9.4.4.1.1 P1 – P12 Tree pruning, felling, earthworks.</p> <p>9.4.4.1.2 C1 Tree maintenance.</p> <p>9.4.4.1.3 RD1 – RD8 Tree pruning, felling, earthworks.</p> <p>9.4.4.1.4 D1 – D2 Tree pruning, felling 9.4.7.1 Appendix – Schedules of significant trees.</p>	Support in Part	<p>Kāinga Ora support the Significant and Other Trees qualifying matter.</p> <p>The rules in Chapter 9 of the District Plan sufficiently recognise and provide for the management of notable trees. Such rules provide a suitable framework for considering new buildings in proximity to notable trees, or their removal.</p> <p>Rule 9.4.4.1.1 P12 triggers the need for resource consent for earthworks within 5m of a street tree, however consent is always granted provided the works are undertaken by, or under the supervision of, a works arborist. The relief sought would reduce costs and the reliance on the resource consent process and is therefore more consistent</p>	<ol style="list-style-type: none"> 1. Retain Significant and Other Tree Qualifying Matter. 2. Amend Rule 9.4.4.1.1 P12 as follows: <p>Rule 9.4.4.1.1 P12 - Activities shall be undertaken by, or under the supervision of, a works arborist. employed or contracted by the Council or a network utility operator.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				with Objective 3.3.2.	
13.	Waterbody setbacks	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>6.6.4 City and Settlement Water Body Setbacks 6.6.4.1 – 6.6.4.4 Activities within water body setbacks</p>	Support in Part	<p>Section 6 seeks the preservation of rivers and their margins and their protection from inappropriate subdivision, use and development. Similarly, Section 6 also recognises and provides for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga.</p> <p>Kāinga Ora is supportive of these Section 6 matters being identified as a qualifying matter. However, where the identified waterbodies do not meet a Section 6 threshold, such as for 'Environmental Asset Waterways' and 'Network Waterways' use of waterway setbacks as a qualifying matter, Council needs to demonstrate why development that is otherwise permitted under</p>	Remove 'Environmental Asset Waterways' and 'Network Waterways' as qualifying matter, unless a site by site assessment has been undertaken that demonstrates why development that is otherwise permitted under MDRS is inappropriate.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>MDRS is inappropriate, for every specific waterway (and adjacent site) where a qualifying matter is proposed.</p> <p>The existing provisions in Chapter 6.6 of the District Plan are sufficient.</p>	
14.	Public Open Space areas; and Ōtākaro Avon River Corridor.	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>18.4 to 18.96.1A Qualifying matters</p> <p>13.14 Specific Purpose (Ōtākaro Avon River Corridor) Zone – All provisions, including Appendix 13.14.6.2 specifying alternative zone provisions applicable to privately owned properties within the zone</p>	Oppose	<p>Kāinga Ora considers this qualifying matter is unnecessary and seek that it is deleted.</p> <p>While the use of areas for open space purposes is identified as a qualifying matter under RMA s77O(f), the areas zoned Open Space are owned by CCC and many are administered under the Reserves Act 1977. Council ownership, and Open Space zoning, makes it unlikely that these areas will be developed for medium density housing and such development would also be contrary to the purposes for which these sites were reserved. Further, the Housing Supply Act only requires CCC</p>	Delete the Open Space (recreation zone) qualifying matter and any relevant provisions proposed in its entirety.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		15.4.3.2.1 Maximum building height; Appendix 15.15.1 Town Centre Zone (Belfast/Northwood) Outline Development Plan		to incorporate MDRS into every relevant residential zone (not Open Space Zone). The s77O(f) matter is noted as being relevant for other councils where their District Plan does not include an Open Space zone and instead reserves often have a residential zoning. As with the Open Space Zones, Kāinga Ora note that the Ōtākaro 'red zone' area has been subject to detailed place-based assessment, with large-scale residential development not anticipated in this area.	
15.	Residential Character Areas	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3. 14.5.3.1.1 P4 Conversion to two residential units –	Oppose in Part	Kāinga Ora support, in principle, the management of character as a qualifying matter. However, Kāinga Ora does not consider appropriate justification has been provided for the proposed new or extended 'character areas' set out in PC13 and PC14 to demonstrate that they contain specific characteristics that	<ol style="list-style-type: none"> 1. Delete all new or extended character areas as qualifying matters and undertake further analysis to determine the exact values of the resources that the Council seeks to manage in the District Plan. 2. For existing character areas retain the controlled activity status for new buildings that exists in the Operative Plan - Rule 14.5.3.1.2 C1.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>Character Area Overlays</p> <p>14.5.3.1.2 C1 Character Area Overlays – new residential units to rear</p> <p>14.5.3.1.3, RD6, RD14 Area-specific rules and character overlays.</p> <p>14.5.3.2.3 Building height – Character Area Overlays.</p> <p>14.5.3.2.5 – 14.5.3.2.14 Built form rules – Character Area Overlays.</p> <p>14.15.27 Matters of discretion - Character Area Overlays.</p> <p>14.8.1.1 P18 – Conversion to two residential units –Lyttelton Character Area.</p> <p>14.8.3.1.1 P5 – Minor residential unit in Lyttelton Character Area or Lyttelton Residential Heritage Area.</p>		<p>make the level of development provided by the MDRS or policy 3 inappropriate in the area. Further, they blur the line between the protection of historic heritage values as set out under s6(f) of the RMA, and amenity values as set out under section 7 of the RMA. This is especially the case where both character and heritage area overlays apply to the same geographic area.</p> <p>Kāinga Ora questions the planning method and assessment undertaken to determine the proposed provisions.</p> <p>Kāinga Ora considers that any such provisions and values identified should be ‘managed’ rather than ‘protected’ in the District Plan. Kāinga Ora seeks the provisions as proposed are deleted and that further analysis is undertaken to determine the exact values of the resources that the Council</p>	<p>14.5.3.2.3 Building height – Character Area Overlays, and</p> <p>14.5.3.2.5 – 14.5.3.2.14 Built form rules – Character Area Overlays.</p> <p>3. In the event that the Character Area qualifying matter remains, explicit provision is sought for the ability to develop Papakāinga/Kāinga Nohoanga, noting that local Rūnanga have purchased the former Lyttelton West School Site.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>14.8.3.1.2 C3 – New residential unit to rear Lyttelton Character Area.</p> <p>14.8.3.1.3 RD3 – Lyttelton Character Overlay – new buildings, alterations etc.</p> <p>14.8.3.1.3. RD5-RD7, RD9 – not meeting Lyttelton Character Area or Residential Heritage Area built form rules</p> <p>14.8.3.1.3 RD8, RD10 –not meeting Lyttelton Character Area built form rules.</p> <p>14.8.3.1.3 RD11 - Lyttelton Character Area or Lyttelton Residential Heritage Area – not meeting minor residential units rules.</p> <p>14.8.3.2.2 –14.8.3.2.6 Built form rules – Lyttelton Character Area or Lyttelton Residential Heritage Area.</p> <p>14.8.3.2.7 – 14.8.3.2.12 -Built form rules – Lyttelton Character Area only.</p>		<p>seeks to manage in the District Plan.</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
16.	Electricity Transmission Corridors.	<p>6.1A Qualifying matters.</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.4.1.5 NC6 – NC7 National Grid transmission and distribution lines.</p> <p>14.5.1.5 NC2 – NC3 National Grid transmission and distribution lines.</p> <p>14.7.1.5 NC2 National Grid transmission and distribution lines.</p> <p>14.12.1.5 NC1 – NC2 National Grid transmission and distribution lines.</p>	Support	Kāinga Ora support this qualifying matter noting that the qualifying matter only relates to the National Grid Transmission Lines (nationally significant infrastructure) in accordance with s771(e) and no other lesser category of line.	Retain Electricity Transmission Corridors qualifying matter only to the extent of the corridor as defined in the NES ET.
17.	Airport Noise Influence Area	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the</p>	Oppose in Part	Kāinga Ora seeks that the Airport Noise Influence Area qualifying matter be deleted thus allowing all existing	Delete this qualifying matter and all proposed provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>Safe or efficient operation of nationally significant infrastructure (Christchurch Airport)</p> <p>14.4.1 – 14.4.4, 14.13, 14.14 Low Density Residential Airport Influence Zone and Airport Influence Density Precinct.</p>		<p>residential zoned land within the Airport Noise Influence Area to be zoned Medium Density Residential as per the direction in the Act.</p> <p>While Kāinga Ora agrees that it is appropriate to protect strategic infrastructure (including Christchurch International Airport) from reverse sensitivity effects, it does not consider that restricting density under the Airport Noise Influence Area is necessary to avoid reverse sensitivity effects. Further, Kāinga Ora considers that the health, safety and amenity of existing and future residents living within the Airport Noise Influence Area would be appropriately maintained if the land was zoned Medium Density Residential. Any new buildings and additions to existing buildings located within the 55 dB Ldn air noise contour or the 55 dB Ldn engine testing contour would continue to be</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				subject to the acoustic insulation standards set out at Rule 6.1.7.2.2 (Activities near Christchurch Airport) in the District Plan as required by Policy 6.1.2.1.5 b. ii. (Airport noise).	
18.	Lyttelton Port Influence Overlay	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.8.3.1.1 – 14.8.3.1.5 Area-specific rules - Lyttelton Port Influences Overlay</p>	Support	<p>Kāinga Ora support the Lyttelton Port Influence Overlay qualifying matter noting that the qualifying matter only relates to nationally significant infrastructure in accordance with s771(e).</p> <p>Kāinga Ora does not oppose the noise insulation standards.</p> <p>Kāinga Ora notes that the geographic area covered by the Port Influence Overlay is small and overlaps with a proposed Heritage Area. Furthermore, the Port is obliged to pay for the acoustic insulation of existing dwellings within the contour (Rule 13.8.4.2.7), so the scale, plus the costs and benefits, are markedly different between the</p>	Retain Lyttelton Port qualifying matter.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Port Influence Overlay and the Airport Noise Influence Area qualifying matter.	
19.	NZ Rail Network Interface Sites.	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>6.1.7 Activities near infrastructure.</p> <p>14.4.1.3 RD28 and 14.4.2.7 Setback from rail corridor.</p> <p>14.5.1.3 RD12 and 14.5.2.7 Setback from rail corridor.</p> <p>14.8.1.3 RD16 and 14.8.2.4 Setback from rail corridor.</p>	Oppose	Kāinga Ora considers that the standard internal boundary setback for zones is appropriate.	Delete NZ Rail Network Interface Sites qualifying matter.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		14.12.1.3 RD13 and 14.12.2.5 Setback from rail corridor.			
20.	Radio Communication Pathways for the Justice and Emergency Services Precinct.	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3. 6.12 Radio communication Pathway Protection Corridors.	Neutral	Kāinga Ora recognise the need to maintain radio communication for emergency services, and does not provide any further feedback.	Note: Table 1 in Chapter 6.1A references an abbreviation rather than the qualifying matter rule reference.
21.	Vacuum Sewer Wastewater Constraint Areas	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3. 8.9A Waste water constraint areas	Support in Part	Kāinga Ora recognise the need to ensure sufficient infrastructure is available to service developments. The Restricted Discretionary Activity status and the relevant matters of discretion are generally considered appropriate, however an additional matter of discretion that provides a consenting pathway for intensification in	Amend as follows: The Council's discretion shall be limited to the following matters: <u>c. The ability to connect into any nearby non-vacuum wastewater system.</u> <u>d. The extent to which alternative waste water solutions are available that do not adversely affect the</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				these areas where infrastructure constraints can be addressed by alternative means is required.	<u>function of the Council's waste water systems.</u>
22.	Sunlight Access	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.2.6 – Height in relation to boundary,</p> <p>14.6.2.2 – Height in relation to Boundary, 14.15.2 – Diagram D.</p>	Oppose	Kāinga Ora oppose 'Sunlight Access' being a qualifying matter and considers this to be inconsistent with the requirements of Section 77L.	Delete the Sunlight Access qualifying matter and all associated provisions.
23.	Low Public Transport Accessibility.	<p>14.1 Introduction,</p> <p>14.2 Objectives and Policies, 14.3 How to interpret and apply the rules, 14.4 Rules - Residential Suburban Zone and Residential Suburban Density Transition Zone, 14.7</p>	Oppose	Kāinga Ora opposes the 'Low Public Transport Accessibility' being a qualifying matter and considers this to be inconsistent with the requirements of Section 77L.	<ol style="list-style-type: none"> 1. Delete the Low Public Transport Accessibility Qualifying Matter and all associated provisions. 2. Rezone all areas subject to this QM to MRZ.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		Rules - Residential Hills Zone, 14.8 Rules - Residential Banks Peninsula Zone, 14.15 Rules - Matters of control and discretion, 14.16 Rules - Appendices – all as they apply to areas that are zoned Residential Suburban or Residential Hills, or in Lyttelton zoned Residential Banks Peninsula.		Kāinga Ora is particularly concerned to note the large areas with inadequate services in the eastern parts of the District, where the lack of such services has the potential to exacerbate existing social inequalities.	
24.	Industrial Interface	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3. 8.6.15 North Halswell – additional standards 8.7.13 North Halswell – additional matters – Medium and High Density Residential Zones in North Halswell 8.8.17 North Halswell – additional matters of discretion.	Oppose	Kāinga Ora considers that effects from industrial activities should first be mitigated at the source. The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.	Delete the Industrial Interface Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be appropriate with the benefits of the QM not outweighing the costs.</p>	
25.	Riccarton Bush Interface	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.2.3 Medium Density Residential Zone – Building height.</p> <p>14.4.2.3 Residential Suburban Zone – Building height.</p>	Oppose	<p>Kāinga Ora considers that the existing long-established Operative Plan rules requiring a 10m building and earthworks setback from boundaries with the Bush are appropriate for managing potential interface issues/ impacts on tree health. The retention of the existing setback is quite different from the proposed QM which extends across roads and goes some distance from the Bush itself.</p> <p>The area around Riccarton Bush is ideally located for supporting a High Density</p>	<ol style="list-style-type: none"> 1. Delete the Riccarton Bush Interface Qualifying Matter and all associated provisions. 2. The existing tree setbacks in Chapter 9.4 are retained.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Residential Zone given its close proximity to a Metropolitan centre, cycleways, high frequency bus routes, and the large university activity hub.	
26.	Key Transport Corridors – City Spine	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.2.18 – Spine Road setbacks.</p> <p>14.6.2.17 - Spine road setbacks.</p> <p>15.4.2.10 – spine corridor setbacks.</p> <p>15.5.2.10 Setback from corridor.</p>	Oppose	<p>Kāinga Ora oppose the ‘City Spine’ being a qualifying matter and considers this to be inconsistent with the requirements of Section 77L.</p> <p>The associated rules require buildings and outdoor living spaces to be set back from spine road corridors in both residential and commercial zones. In commercial zones there is a direct conflict in urban design outcomes (and rules) where the Key Pedestrian Frontage rules require buildings to be built up to the road boundary in order to deliver good urban design outcomes and facilitates a continuous street edge (often with veranda cover for pedestrians).</p>	Delete the Key Transport Corridors – City Spine Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		15.6.2.11 Setback from corridor. 15.8.2.13 Setback from corridor. 15.10.2.10 Setback from corridor. 15.12.2.13 Setback from corridor. 15.14.5.3 Matters of Discretion.		<p>It is understood that the intention of the rule is to enable road widening in the future to accommodate public rapid transit. If Council's intention is to acquire land in the future to facilitate public works then it should use the designation powers available to it.</p> <p>Given the highly developed nature of these existing corridors with lengthy sections of commercial property built to the road boundary, it is unclear how any corridor-long road widening will occur without major land acquisition and demolition.</p>	
27.	Sites of historic heritage items and their settings (City Centre Zone) - Cathedral Square, New Regent Street, the Arts Centre.	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.	Support	Kāinga Ora support the management of Historic Heritage as a qualifying matter, noting that Cathedral Square, New Regent Street and the Arts Centre contain individually listed heritage items and are within identified heritage settings. This is a matter of	Retain sites of historic heritage items and their settings (City Centre Zone) - Cathedral Square, New Regent Street, the Arts Centre.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		15.11.1.2 C2 Works at 100 Cathedral Square 15.11.1.3 RD9 Works at 100 Cathedral Square 15.11.1.3 RD11 buildings on New Regent Street, the Arts Centre, and in the Central City Heritage Qualifying Matter and Precinct 15.11.2.11 Building height in area-specific precincts		national significance in Section 6.	
28.	Belfast/Northwood Outline Development Plan Features	15.4.3.2.1 Maximum building height; Appendix 15.15.1 Town Centre Zone (Belfast/Northwood) Outline Development Plan.	Neutral	Kāinga Ora does not have a view on this site-specific qualifying matter.	
Chapter 5 – Natural Hazards					
29.	5.5	Policy 5.2.2.5.1 – Managing development in Qualifying Matter Coastal Hazard Management Areas	Support in Part	Kāinga Ora support the management of significant risks from natural hazards as a qualifying matter (in appropriate circumstances), noting that it is a matter of national significance in Section 6.	Amend the policy as follows: Within the following Qualifying Matters, development, subdivision and land use that would provide for intensification of any site shall be avoided, unless the risk is from coastal inundation and a site specific assessment demonstrates the

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Kāinga Ora generally supports the risk based approach to the management of natural hazards but considers that the avoidance of intensification should be reserved to high risk from coastal inundation.</p> <p>Rule 5.4A.4 D1 requires resource consent for new buildings, other than accessory buildings, extensions etc, in areas shown on the planning maps as Qualifying Matter Coastal Hazard Medium Risk Management Area as a Discretionary Activity. Even with a site specific assessment however, Policy 5.2.2.5.1 seeks to avoid this.</p>	<p>risk is medium, low or very low based on thresholds defined in Table 5.2.2.5.1a below:</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
30.	5.5	Policy 5.2.2.5.2 - Managing development within Qualifying Matter Tsunami Management Area	Support in Part	<p>Kāinga Ora considers that the Council's intent to retain Residential Suburban / Residential Suburban Density Transition zoning in the Tsunami Management Area is disproportionate based on the modelled return period. This may be appropriate for 1:100 or 1:200, especially if such areas are also covered by high flood and/or coastal inundation risk overlays.</p> <p>Kāinga Ora seeks changes to the wording of Policy 5.2.2.5.2 to provide certainty of the outcomes intended, noting that the rule allows for up to four residential units to be constructed on these sites (Rule 14.4.1.1 P4, P5 and P6) so there is a disconnect between the use of the term 'avoid' and what the provisions would allow for as a permitted activity.</p>	<ol style="list-style-type: none"> Amend Policy 5.2.2.5.2 as follows: Within the Tsunami Management Area Qualifying Matter, avoid discourage development, subdivision and land use that would provide for intensification of any site, unless the risk to life and property is acceptable. Alternatively the Policy framework could be retained if the geographic extent of the QM matter is better aligned with a 1:100 return period or covers an area reflective of the Tsunami Inundation area identified by the Greater Christchurch Partnership as part of its consultation on the Greater Christchurch Spatial Plan.
31.	5.4	Flood hazard provisions	Support in Part	Kāinga Ora seek that spatial identification of flood hazard	<ol style="list-style-type: none"> Amend the provisions to remove / delete the mapped Hazard

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>management areas are made available through a set of non-statutory maps, which would operate as interactive maps on the Council's GIS website – thereby operating as a separate mapping viewer to the statutory District Plan maps. This approach is different to that of the traditional means of displaying hazard overlays on district plan maps and reflects that these maps do not have regulatory effect. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 Resource Management Act 1991 process. Kāinga Ora notes that this is an approach taken by other Councils around the country.</p>	<p>Management Areas from within the District Plan and instead hold this information in non-statutory GIS maps.</p> <ol style="list-style-type: none"> 2. Delete all references to maps within the District Plan. 3. Undertake any consequential amendments to zones, overlays, precincts, and qualifying matters to reflect the relief sought in the submission.
32.	5.4.1.3	Exemptions for daylight recession planes in the Flood Management Area	Support in Part	Kāinga Ora seeks for the applicable daylight recession planes in all residential zones to	Amend rules as follows:

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>be determined as if the ground level at the relevant boundary was the minimum floor level set in the activity specific standards in Rule 5.4.1.1, or natural ground level, whichever is higher.</p>	<p>5.4.1.3 a. For P1 and P2 in Rule 5.4.1.1, the applicable daylight recession plane in residential zones (other than in the Medium Density Residential Zone and High Density Residential Zone) shall be determined as if the ground level at the relevant boundary was the minimum floor level set in the activity specific standards in Rule 5.4.1.1, or natural ground level, whichever is higher.</p> <p>5.4.1.3b. For P3 and P4 in Rule 5.4.1.1, the applicable daylight recession plane in residential zones (other than in the Medium Density Residential Zone and High Density Residential Zone) shall be determined as if the ground level at the relevant boundary was the minimum floor level specified in the Minimum Floor Level Certificate issued under Rule 5.4.1.2, or natural ground level, whichever is higher.</p> <p>5.4.1.3 c</p> <p>viii. Rule 14.5.2.6 Height in relation to boundary – Medium Density Residential Zone</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>ix. Rule 14.6.2.2 Height in relation to boundary – High Density Residential Zone</p>
33.	5.4A	Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area	Oppose in Part	<p>Kāinga Ora seek that spatial identification of coastal hazard management areas be made available through a set of non-statutory maps, which would operate as interactive maps on the Council’s GIS website – thereby operating as a separate mapping viewer to the statutory District Plan maps. This approach is different to that of the traditional means of displaying hazard overlays on district plan maps and reflects that these maps do not have regulatory effect. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 Resource Management Act 1991 process. Kāinga Ora notes that this is an approach</p>	<ol style="list-style-type: none"> 1. Delete all references in all rules in this section that refer to maps. 2. Include a rule to provide for a Controlled Activity to subdivide within the Tsunami Management Area. 3. Amend Rule 5.4A.5 NC3 as follows: <ol style="list-style-type: none"> a. Development, subdivision and land use that would provide for residential intensification of any site within the Qualifying Matter Tsunami Management Area except that permitted or controlled in Rules 14.4.1 and 14.4.2. 4. Any consequential amendments to zones, overlays, precincts, and qualifying matters to reflect the relief sought in the submission.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>taken by other Councils around the country.</p> <p>Rule 5.4A.5 NC3 makes development, subdivision and land use that would provide for residential intensification of any site within the Qualifying Matter Tsunami Management Area except that permitted or controlled in Rule 14.4.1 a non-complying activity.</p> <p>Rule 14.4.2 deals with controlled activities so the rule outlined above needs to be amended to reference Rule 14.4.2.</p> <p>There is no applicable rules in the subdivision chapter for the Tsunami Management Area.</p> <p>Rule 14.4.1 provides for up to four residential units to be constructed as a permitted activity. If this level of intensification is provided for, then having a non-complying</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				activity status and an avoid policy seems nonsensical.	
Chapter 6 – General Rules and Procedures 6.10A – Tree Canopy Cover and Financial Contributions					
34.	6.10A	6.10A Rules 8.3, 8.5.1 and 8.7.12 - Subdivision; Rules 14.4.2 – 14.11.2 – Residential Built Form Standards. 14.6.1.3 RD13. 14.6.2.7 - Landscaping and tree cover.	Oppose	<p>Kāinga Ora welcomes the Council’s recognition of trees as a key element in successful urban environments.</p> <p>Kāinga Ora strongly support the Council increasing its prioritisation of the need to renew streetscapes, especially in areas where intensification has and will continue to occur. Such renewals should include kerb and channel replacement, undergrounding of overhead wires, and street tree planting.</p> <p>Kāinga Ora has substantial concerns with the 20% tree canopy cover target and considers it fundamentally</p>	Delete Section 6.10A and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>unachievable in medium and high density environments on private land. Kāinga Ora consider the requirements to achieve 20% tree canopy cover is inconsistent with the spatial outcome requirements set out in the NPS-UD, and the Medium Density Residential Standard (MDRS) provisions of the Housing Supply Act.</p> <p>Kāinga Ora considers that the proposed financial contribution calculator is complicated and flawed, a simpler formula would be to require 1 tree to be planted per 100m² of site area, as an easier compliance threshold than a trigger of 10% of future canopy cover.</p> <p>It also has concerns with the reliance on Financial Contributions. Given that Council already own extensive areas of park and open space land (including several thousand hectares of land on</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>the Port Hills and Red Zone), in addition to extensive road reserve and local park areas, and given that Council takes Development Contributions for new parkland as part of any new development, the need for the land component to form part of the financial contributions appears to be particularly hard to justify.</p> <p>The need to provide rapid canopy cover potentially creates a perverse incentive to plant faster growing exotic species rather than natives. The proposed Financial Contribution could therefore result in a decline in biodiversity by driving developers to plant exotics over natives, with attendant adverse biodiversity outcomes, which is contrary of the desire in the Urban Forest Plan to seek diversity in tree species.</p>	
Chapter 8 – Subdivision, Development and Earthworks					

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
35.		Policy 8.2.2.1 – Recovery activities	Support in Part	<p>PC14 seeks to delete this policy which provides for a range of intensification opportunities in the RS and RSDT zones.</p> <p>Deletion of this policy may well be appropriate if MRZ is properly implemented across all relevant residential zones and the Kāinga Ora submission opposing the Public Transport and Airport Noise Influence Area QMs is confirmed i.e. the only areas which retain low density RS/ RSDT/ RHZ zoning are those subject to a high risk of natural hazards.</p>	Delete the policy as notified.
36.		Policy 8.2.3.2 – Connections to infrastructure	Support	PC14 proposes an additional clause (g) relating to development in the vacuum sewer area. This policy provides for development in the area if connection is able to be made to a part of the waste water system that is not part of the vacuum sewer, or if sufficient capacity can be demonstrated (which could be for example through -on-site	Retain Clause (g) as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				holding tanks and off-peak pumping into the network).	
37.		<p>Tree Canopy and Financial Contribution provisions:</p> <p>Objective 8.2.6 and associated policies;</p> <p>Clause 8.3.1(e)-(f) – how to apply to the rules</p> <p>Clause 8.3.3(b) – financial contributions</p> <p>Clause 8.3.7 – consent notices</p> <p>Clause 8.7.12 – Assessment matters</p>	Oppose	In line with our submission seeking the deletion of the tree canopy financial contribution rules, the related proposed references to tree canopy in the subdivision chapter policies and rules is also opposed.	Delete the provisions relating to the tree canopy financial contribution and associated tree canopy rules.
38.		8.4.1.1 - Notification	Support	Support clause (a)(i) that any controlled or restricted discretionary subdivision application shall not be publicly or limited notified.	Retain 8.4.1.1 as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
39.		8.5.1.2 – Controlled activities – C8 and C9	Support	Support controlled activity status for the creation of vacant allotments (C8) or allotments containing an existing or consented dwelling (C9), where these allotments comply with density standards.	Retain C8 and C9 as notified
40.		8.5.1.3 – Restricted discretionary activities – RD2(c) and RD2A	Support	Support restricted discretionary activity status where the proposed allotments do not comply with C8 or C9.	Retain RD2(c) and RD2A as notified.
41.		8.6.1 – minimum dimensions	Oppose	<p>Support the use of a minimum dimension for the creation of vacant sections. However, Kāinga Ora recommends an 8m x 15m minimum shape factor for MRZ and HRZ sites as this is demonstrated as practicable to construct a permitted medium density residential dwelling.</p> <p>The rule needs clarification that the minimum sizes apply to the creation of vacant lots, rather</p>	<p>Amend clause 8.63.1(c) as follows:</p> <p><u>The creation of vacant allotments that do not contain an existing or consented residential unit Allotments</u> in the Medium Density (including MRZ Hills), and High Density Residential Zones, shall <u>have accommodate</u> a <u>minimum dimension shape factor</u> of <u>10m 8m x 15m</u>. <u>Within the Medium Density Residential (Residential Hills Precinct) Zone the allotment shall have a minimum dimension of 17m x 12m.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>than lots with an existing or consented dwelling.</p> <p>Similarly clarity needs to be retained that is explicit that the minimum net site provisions shall not apply to sites used exclusively for access, reserves, or infrastructure, or which are wholly subject to a designation.</p>	<p><u>This shape factor shall be located outside of:</u></p> <ol style="list-style-type: none"> <u>1. Land which may be subject to instability or is otherwise geotechnically unsuitable;</u> <u>2. Any existing or proposed easement areas required for access or services purposes;</u> <u>3. Network Utilities, including private and public lines.</u>
42.		<p>Table 1 – Minimum net site area</p> <p>Clause (a) and (c)</p> <p>Table 6 – Allotments with existing or proposed buildings</p>	Oppose	Kāinga Ora opposes both Table 1 and Table 6 and consider that the minimum shape factor provision proposed above is more appropriate	Delete Table 1 and Table 6.
44.		<p>8.9.2.1 – Earthworks</p> <p>Table 9</p>	Support in Part	<p>Earthworks are permitted through rule 8.9.2.31(P1), provided they comply with the volumes specified in Table 9.</p> <p>Table 9(d) in the Operative Plan limits earthworks to no more</p>	Amend Table 9(d) so the maximum volume is <u>50m³250m³/ site net fill above existing ground level</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>than 20m³ in all residential zones. Whilst these volumes do not include earthworks associated with a Building Consent i.e foundation construction, they are invariably triggered through the formation of driveways and landscaping. In practice, a 20m³ limit is frequently triggered for low density suburban development let alone medium density outcomes. As an example a standard driveway for a single dwelling is 4m wide by say 30m long = 120m². To build the driveway requires existing earth to be removed to a depth of 20cm, and then replaced with basecourse prior to being gravelled or asphalted. There is no change to existing ground levels. The cut is 24m³ (120m² x 0.2m depth), with fill being the same, resulting in 48m³.</p> <p>The rule threshold is considered to be unrealistically low, such that it generates numerous consents that are</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>invariably granted. The key effects that need to be controlled with earthworks are erosion and sediment control during construction (although the scale of such works means that they are generally completed within a couple of days and therefore do not generated significant risks of sediment discharge), and permanent changes to finished ground levels that would result in overlooking of neighbouring properties i.e. forming raised mounds or terraces.</p> <p>It is therefore sought that the rule be amended so the volume is net fill above existing ground levels. It is noted that filling within Flood Management Areas is separately controlled in Chapter 5.</p>	
Chapter 12 - Papakāinga/ Kāinga Nohoanga Zone and Chapter 8 subdivision					
45.	12.4.1 and 12.5.1	Activity status tables and built form rules	Support in Part	Kāinga Ora seek that the Papakāinga Zone be retained	Amend the Papakāinga/Kāinga Nohoanga Zone activity table and built

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				as a specific zone, given its unique policy outcomes and function. We seek that the MRZ built form rules however apply to the Papakāinga Zone. The activity status tables and built form standards are sought to therefore be amended to align with MRZ outcomes i.e. the Papakāinga Zone rules controlling matters such as height, boundary setbacks etc should simply align with those in the MRZ.	form standards to align with the built form rules in the MRZ.
46.	Chapter 8	Subdivision provisions relating to the Papakāinga/ Kāinga Nohoanga Zone	Oppose	The suite of subdivision provisions relating to minimum site sizes for the Papakāinga/ Kāinga Nohoanga Zone are sought to also be amended to align with MRZ outcomes.	Amend the subdivision standards for the Papakāinga/ Kāinga Nohoanga Zone to align with MRZ outcomes.
Residential Zone Introduction and Policy Framework – 14.1-14.2					
47.	Residential	14.1(e) Introduction to residential policies	Support in Part	Helpful statement for plan interpretation	Retain statement. Amend reference at the end of the statement to "...subclause g f "

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
48.	Residential	14.2.1 – Objective - housing supply	Support	Support amendments given that Christchurch has moved beyond the immediate earthquake recovery period. Support recognition that the community's housing needs may change, and that provision needs to take into account future needs.	Retain the objective
49.	Residential	Policy 14.2.1.1 – Policy – Housing distribution and density	Support in Part	<p>Support the amendments to clause (a)(ii) and (iii) that clearly state the expectation that high density residential development will be established in both the Central City and in and near identified commercial centres.</p> <p>By amending clause (iii) to now reference high density, the policy is now silent on the locations and expectation of medium density development. Given that the introduction of MRZ across most of the City, there is a need for a clear statement in the policy regarding what is now the normative housing density.</p>	<p>Retain clauses (a)(ii) and (iii).</p> <p>Add a new clause (a)(iv) as follows (with consequential renumbering of subsequent clauses):</p> <p><u>(iv) medium density residential development is established across the majority of the City unless precluded by a qualifying matter.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
50.	Residential	Table 14.2.1.1a – Zone descriptions	Support	The proposed MRZ and HRZ descriptions align with the National Planning Standards descriptions.	Retain zone descriptions
51.	Residential	Policy 14.2.1.2 and 14.2.1.3	Support	Support deletion of these two policies as their original policy direction regarding the location of new medium density areas no longer aligns with the direction in the Enabling Act.	Support the deletion of these two policies.
52.	Residential	Objective 14.2.2 and associated policies 14.2.2.1-14.2.2.4 – short term recovery	Oppose	<p>Given that Christchurch is now some 12 years post-earthquake there may no longer be a need for these policies and associated mechanisms such as the 'Enhanced development mechanism' (EDM) and the 'Community Housing Redevelopment Mechanism'(CHRM).</p> <p>The housing opportunities and more enabling built form standards now provided through the MRZ and HRZ may make this suite of policies and short-term recovery tools unnecessary, however if the</p>	Delete Objective 14.2.2 and associated policies 14.2.2.1-14.2.2.4 and the associated EDM and CHRM in the event that the Public Transport accessibility QM is removed, and the Tsunami Hazard QM reduced to 1:100 year hazard.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				QM are retained and large parts of the city retain RS or RSDT then the EDM and CHRM are sought to remain as important tools.	
53.	Residential	Objective 14.2.3 and associated policies 14.2.3.1-14.2.3.5 - MDRS	Support	The objective and associated policies align with the policies mandated in the Enabling Act.	Retain the objective and associated policies. <i>Note that sequentially Policy 5 (14.2.3.3) should come at the end i.e. the policy 'batting order' should be 1 to 5 rather than the current arrangement of 1,2, 5, 3, 4.</i>
54.	Residential	Policy 14.2.2.2 b. iv. (Recovery housing higher density comprehensive redevelopment)	Oppose	Provided the Airport Noise Influence Area qualifying matter is deleted, the reference in Policy 14.2.2.2 b. iv. to Christchurch International Airport is unnecessary given the relevant land will be zoned for medium density residential development.	14.2.2.2 Policy - Recovery housing higher density comprehensive redevelopment a. Enable and incentivise higher density comprehensive development of suitably sized and located sites within existing residential areas, through an Enhanced development mechanism which provides:... iv. Christchurch International Airport, arterial traffic routes, and railway lines.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
55.	Residential	Policy 14.2.3.6 – Framework for building heights	Oppose	<p>The policy does not provide a framework or rationale for the proposed heights and does not specify what the ‘specific conditions’ might be when taller buildings would be enabled.</p> <p>There is merit in having a policy that clearly articulates the building height hierarchy, with this hierarchy tied to proximity to commercial centres and the size / range of services provided in those centres.</p> <p>The requested amendments also reflect the Kāinga Ora position that Metropolitan Centres be employed within the centres hierarchy, as per the forward-looking aspects of the NPS-UD policies of 1, 3, and 6.</p> <p>These are sought to cover the existing key activity areas for Riccarton, Papanui, and Hornby. Furthermore, the higher density zoning around the city centre and metropolitan centres, are sought to extend</p>	<p>Delete policy and replace with the following:</p> <p><u>Enable building heights in accordance with the planned urban built character for medium and high density areas, whilst also enabling increased building heights under specific conditions.</u></p> <p><u>Encourage greater building height, bulk, form and appearance to achieve high density planned urban form when within the proximity of nearby commercial centres to deliver:</u></p> <p><u>a. At least 10 storey buildings within 1.2km of the Central City and the Metropolitan Centre zones in Hornby, Riccarton and Papanui;</u></p> <p><u>b. At least 6 storey buildings in proximity to town centres and medium and large local centres;</u></p> <p><u>c. At least 3-4 stories everywhere else in the MRZ.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				for 1.20 km, with a 400m Height Variation Overlay of 36m sought within 400m of the edge of these centres.	
56.	Residential	Policy 14.2.3.7 – management of increased building heights	Oppose	<p>The MDRS has the height rule as a restricted dictionary activity. MDRS Policy 5 explicitly seeks to ‘provide for developments not meeting permitted activity status, while encouraging high quality developments’.</p> <p>Taller buildings are therefore anticipated as being potentially appropriate subject to a site-specific assessment of effects. The policy needs to properly reflect that taller buildings are anticipated in appropriate locations and where the specific design properly manages the effects generated by the increase in height. As written this policy directly conflicts with Policy 5 of Sub clause 6 of Schedule 3A RMA.</p>	<p>Delete the policy and replace it with:</p> <p><u>Within medium and high density zoned areas, increased building heights are anticipated where:</u></p> <p>i. <u>The site has good accessibility to is public and active transport corridors, public open space, and a town or local commercial centre; and</u></p> <p>ii. <u>The design of the building appropriately manages potential shading, privacy, and visual dominance effects on the surrounding environment.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Taller residential buildings within 1.2km of the central city can only have a positive economic impact on the CBD by enabling more people to live within walking distance of the town centre. Given the large size of Christchurch, additional enablement of residential opportunities within 1.2km facilitates more people living near the centre i.e. it draws people in, rather than resulting in existing (or potential) CBD residents shifting out.	
57.	Residential	Policy 14.2.3.8 – fire fighting water capacity	Neutral		
58.	Residential	Objective 14.2.5 – high quality residential neighbourhoods	Support in Part	<p>Support the amendments to reference the planned urban character.</p> <p>References to ‘high’ quality in the title and the start of the objective will not always be appropriate or realistic. Use of language around ‘high standard’, ‘high level of amenity’, ‘spacious and</p>	<p>Amend the objective as follows:</p> <p>High Good quality, sustainable, residential neighbourhoods which are well designed, have a high level of amenity, enhance local character and reflect to reflect the planned urban character and the Ngāi Tahu heritage of Ōtautahi.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>attractive pedestrian circulation', 'high levels of glazing' can be used to set a bar that can be unrealistically high (or at least is very subjective). Kāinga Ora support high quality outcomes, however such language is subjective and is an easy stick that can be used by NIMBY opponents to higher density. Invariably multi-unit development involves the balancing of competing design outcomes (which are all perfectly valid), and it comes down to how these are balanced and prioritised – it often isn't possible to tick the optimal outcome across every matter.</p>	
59.	Residential	Policy 14.2.5.1 – Neighbourhood character, amenity, and safety	Oppose	<p>The matters subject to this policy are either captured in the MDRS policies which set the anticipated outcomes for MDRS, or are better articulated through proposed Policy 14.2.5.3 relating to</p>	Delete policy.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>developments of 4 or more units.</p> <p>Policy direction for the remaining low density residential environments is provided through Policies 14.2.5.6-9.</p> <p>This policy therefore duplicates directions which are already better articulated elsewhere in the policy framework</p>	
60.	Residential	Policy 14.2.5.2 – high quality medium density residential developments	Support in Part	<p>Support the amendments to reference the planned urban character.</p> <p>References to ‘high’ quality in the title will not always be appropriate or realistic.</p>	<p>Amend policy as follows:</p> <p>14.2.5.2 Policy – High Good quality, medium density residential development</p> <p>Encourage innovative approaches to comprehensively designed, high good quality, medium density residential development, which is attractive to residents, responsive to housing demands, and provides a positive contribution to its environment (while acknowledging the need for increased densities and changes in residential</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>character) reflects the planned urban built character of an area, through:</p> <ul style="list-style-type: none"> i. consultative planning approaches to identifying particular areas for residential intensification and to defining high good quality, built and urban design outcomes for those areas; ii. encouraging and incentivising amalgamation and redevelopment across large-scale residential intensification areas; iii. providing design guidelines to assist developers to achieve high good quality, medium density development; iv. considering input from urban design experts into resource consent applications; v. promoting incorporation of low impact urban design elements, energy and water efficiency, and life-stage inclusive and adaptive design; and vi. recognising that built form standards may not always support the best design and efficient use of a site for medium density development, particularly for larger sites.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
61.	Residential	Policy 14.2.5.3 – quality large scale developments	Support in Part	<p>The policy is generally appropriate and captures the key design elements necessary to support the good design of more intensive residential complexes.</p> <p>As above, ‘good quality’ is considered to be a more appropriate term than ‘high quality’.</p>	<p>Amend the policy as follows:</p> <p>14.2.5.3 Policy – Good gQQuality large scale developments</p> <p>a. Residential developments of four or more residential units contribute to a high good quality residential environment through site layout, building and landscape design to achieve:</p> <ul style="list-style-type: none"> i. engagement with the street and other spaces; ii. minimisation of the visual bulk of buildings and provision of visual interest; iii. a high good level of internal and external residential amenity; iv. high good quality shared spaces, including communal living spaces and accessways that provide safe, direct access for pedestrians; v. a safe and secure environment; and

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					vi. public through connections for large sites with multiple public frontages.
62.	Residential	Policy 14.2.5.4 – On-site waste storage	Oppose	A policy is not necessary for this level of detail. The matters addressed by the policy are covered at an appropriate level in Policy 14.2.5.3 above.	Delete policy
63.	Residential	Policy 14.2.5.5 – Wind effects	Support in Part	While Kāinga Ora does not oppose the potential need for wind effects to be considered, the concern lays around appropriateness of Matters of Discretion, the proposed height limits triggering an assessment and technical expertise available to carry out these assessments or determine if assessments (or anticipated effects) are appropriate.	<ol style="list-style-type: none"> 1. Retain Policy 14.2.5.5, noting that Kāinga Ora has submitted on provisions relating to wind effects. 2. Move all provisions relating to wind to sit under the General Rules.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
64.	Residential	Objective 14.2.6 – Medium density residential zone	Oppose	The MDRS objective 2 and Policies 1-5 discussed above (objective 14.2.3 and associated policies 14.2.3.1-14.2.3.5) provide the policy framework for MDRS and as such this objective and associated policy are unnecessary	Delete the objective
65.	Residential	Policy 14.2.6.1 - MDRS	Oppose	As per comments on Objective 14.2.6	Delete the policy
66.	Residential	Policy 14.2.6.2 – local centre intensification precincts	Oppose	As discussed in the section on HRZ height limits, the proposed approach to heights and precincts is unnecessarily complicated. Local Centre Intensification Precincts are well-located for enabling more people to live in close proximity to a range of services. The area covered by this precinct is sought to be simply rezoned to HRZ, and as such this policy is no longer necessary and can be deleted.	<ol style="list-style-type: none"> 1. Delete the policy and associated Local Centre Intensification Precinct from the planning maps. 2. As sought elsewhere in this submission, rezone the land within the Local Centre intensification Precinct to HRZ.

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67.	Residential	Objective 14.2.7 and associated policies - HDRS	Neutral	It would thematically make more sense for these provisions to be located after the policies on MRZ, which would then lead into the policies on heights and design outcomes	Relocate the HRZ provisions so they are located after the suite of MRZ policies i.e. after Policy 14.2.3.5.
68.	Residential	Objective 14.2.7 and policies 14.2.7.1-14.2.7.3	Support	The objective and policies provide for higher density development in appropriate locations.	Retain the objective and policies.
69.	Residential	Policy 14.2.7.4 and Policy 14.2.7.5	Oppose	As set out elsewhere in this submission, the precinct approach is unnecessarily complicated. A simplified approach is sought through amendments to the HRZ height rules, with this rationalised approach to heights provided with appropriate policy support through Objective 14.2.7 and policies 14.2.7.1-14.2.7.3 (along with Policy 14.2.3.7 as sought to be amended above)	Delete the policies and the associated Large Local Centre Intensification Precincts and the High Density Residential Precincts.
70.	Residential	Policy 14.2.7.6 – High density development	Oppose	The requirement that sites be at least two stories in height may not be appropriate in a range of circumstances and is	Delete the policy.

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				<p>unnecessarily complex – there is significant theoretical capacity in these areas so maintaining design flexibility is more important than maintaining capacity.</p> <p>Whilst sites can be amalgamated, there is no requirement for amalgamation.</p> <p>It can be quite appropriate to locate building height and mass away from the road edge in high density environments, depending on site shape, size, orientation, and building design</p>	
71.	Residential	Objective 14.2.8 and policies 14.2.8.1 and 14.2.8.2 – Central City	Support	This Operative Plan objective and associated policies are proposed to be deleted in PC14. This deletion is supported as the policy direction is no longer appropriate, with the purpose of the HRZ near the central city better articulated through the proposed new replacement provisions in 14.2.8 and policies 14.2.8.1 and 14.2.8.2	Support the deletion of these provisions as shown in PC14 as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
72.	Residential	<p>Objective 14.2.8 – Future urban zone</p> <p>Associated policies 14.2.8.1 to 14.2.8.7</p>	Support in Part	<p>See comments elsewhere regarding zone labelling. The FUZ label has not been appropriately applied to existing greenfield urban zoned locations – existing urban zoned but unbuilt residential land are sought to be MRZ (unless appropriately justified QM apply). An example of just such an approach is the correct application of a HRZ around the emerging Halswell commercial centre where already zoned RNN land is yet to be built, but has a proposed HRZ applied. In the same way the balance of this RNN area is to have a MRZ applied rather than FUZ.</p> <p>Taking a consistent national view in the application of National Planning Standards, the FUZ zone label is only used in other District Plans for areas that are yet to have an operative urban zone. A FUZ is a ‘holding zone’ that identifies where medium to long term urban growth is anticipated.</p>	<ol style="list-style-type: none"> 1. Delete references to FUZ and relabel existing urban zoned but undeveloped residential land as MRZ (or HRZ if appropriately located proximate to a large commercial centre). 2. Retain the 14.2.8 section as it provides useful direction on how the build-out of greenfield residentially zoned areas is to occur. 3. Amend the objective as follows: <ul style="list-style-type: none"> 14.2.8 Objective – <u>Development of greenfield areas</u> Future Urban Zone <p>Co-ordinated, sustainable and efficient use and development is enabled in the Future Urban Zone <u>greenfield growth areas</u>.</p>

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				<p>The FUZ zone provisions are focussed on preventing rural activities from occurring that could prejudice future urbanisation e.g. quarries or intensive farming or lifestyle block subdivision. Invariably the plan frameworks require a further plan change process to be undertaken to activate or 'live zone' a residential zone that can then be developed.</p> <p>The associated policies that guide the build-out of greenfield areas remain appropriate.</p>	
73.	Residential	Policy 14.2.9.4 – Existing non-residential activities	Support in Part	<p>This existing Operative Plan policy has in practice created ambiguity when non-residential sites are proposed to be redeveloped for a different non-residential activity i.e. the reference to 'redevelopment' can be interpreted as only applying to the existing activity having new facilities, rather than enabling the site to be efficiently repurposed for a</p>	<p>Amend the policy as follows:</p> <p>Enable existing non-residential sites activities to continue to be used for a range of non-residential activities and support their redevelopment and expansion provided they do not:</p> <ul style="list-style-type: none"> i. have a significant adverse effect on the anticipated character and amenity of residential zones; or ii. are of a scale or activity that would undermine the role or

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>different type of non-residential activity.</p> <p>With neighbourhoods transitioning to medium density outcomes, it is important that residents have easy access to convenience retail and a range of community facilities. The adaption and repurposing of existing non-residential sites is a useful tool for enabling such provision as part of delivering good quality neighbourhoods.</p> <p>It is accepted that such changes need to be assessed on a case-by-case basis to ensure compatibility with a residential context, with the MRZ and HRZ description both anticipating that such zones will include compatible non-residential activities.</p>	<p><u>function of any nearby commercial centres, undermine the potential for residential development consistent with the zone descriptions in Table 14.2.1.1a.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
74.	Residential	Objective 14.2.12 and Policy 14.2.12.1 – compatibility with industrial activities	Oppose	<p>Kāinga Ora considers that at the interface of industrial and residential zones the onus for managing effects rest primarily with the industrial activity. The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p> <p>Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be appropriate with the benefits of the QM not outweighing the costs.</p>	Delete Objective 14.2.12 and Policy 14.2.12.1 and the Industrial Interface Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
75.	Residential	14.3 – how to apply the rules		Kāinga Ora notes that the relevant objectives and policies are still provided for within the Plan and therefore questions the relevance of these if the Community Housing redevelopment mechanism has been deleted.	<p>Consistent with this submission, Kāinga Ora supports the deletion of the Community Housing Redevelopment Mechanism, provided Plan Change 14 is amended consistent with the relief sought in this submission.</p> <p>Kāinga Ora notes that the relevant objectives and policies are still provided for within the Plan and therefore questions the relevance of these if the Community Housing redevelopment mechanism has been deleted.</p>
14.3 How to interpret and apply the rules					
76.	Residential	14.3 How to interpret and apply the rules – Clause f. xvi.	Oppose	The proposed deletion is consequential to the deletion of the Airport Noise Influence Area qualifying matter, amongst others deleted here and throughout the body of this submission.	<p>f. There are parts of residential zones where the permitted development, height and/or density directed by the MDRS or Policy 3 of the NPS-UD may be modified by qualifying matters. These are identified in detail in Chapter 6.1A and the Planning Maps, and include the following:</p> <p>i. Historic Heritage including heritage items, heritage settings, Residential</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>Heritage Area, Residential Heritage Area Interface</p> <p>ii. Riccarton Bush Interface Area</p> <p>iii. Heritage, Significant and other Trees</p> <p>iv. Sites of Ecological Significance</p> <p>v. Outstanding Natural Features and Landscapes</p> <p>vi. Sites of Cultural Significance</p> <p>vii. Residential Character Areas</p> <p>viii. High Flood Hazard Management Area</p> <p>ix. Flood Ponding Management Area</p> <p>x. Coastal Hazard High Risk Management Area and Coastal Hazard Medium Risk Management Area</p> <p>xi. Tsunami Management Area</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					xii. Slope Hazard xiii. Waterbody Setback xiv. Railway Building Setback xv. Electricity Transmission Corridor and Infrastructure xvi. Airport Noise Influence Area xvii. Waste Water Constraint Area xviii. Lyttelton Port Influence Area xix. Low Public Transport Accessibility Area xx. City Spine Transport Corridor xxi. Industrial Interface
14.4 Residential Suburban and RSDT Zone rules					
77.	Residential	14.4.2.2 – Tree and garden planting	Oppose	The proposed amendments to this rule duplicate and confuse the regulatory framework with	Delete the proposed amendments and retain the Operative Plan rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>the tree FC rule – essentially it introduces two rules to control the same matter.</p> <p>Kāinga Ora oppose the tree FC rule and this rule amendment for the reasons given in the submission on the tree FC rule.</p> <p>In the event that the tree FC rule is retained, this rule is sought to simply have an advice note directing Plan users to the FC rule and the additional tree canopy outcomes sought in that separate rule.</p>	
78.	Residential	14.4.2.3 - height	Oppose	<p>This rule introduces an 8m height limit if you're in the Riccarton Bush QM and under the Airport Noise Influence Area (which is why it has a RS zoning rather than MRZ).</p> <p>Kāinga Ora have opposed before the extent of the Airport Noise Influence Area and the Riccarton Bush QM and have sought the area around</p>	<ol style="list-style-type: none"> 1. Delete 8m Riccarton Bush height limit. 2. Delete 7m height rule in the Industrial Interface Qualifying matter area and apply relevant MRZ or HRZ heights.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Riccarton Bush is MRZ to the north and HRZ to the south, as such there is no need for an 8m height limit in the RS zone.</p> <p>Separately the height rule also introduces a 7m height limit in the industrial interface QM – which given that this is a rule being applied to the RS and RSDT zones this duplicates an existing situation. Kāinga Ora supports the deletion of this rule and application of relevant MRZ or HRZ zones and heights.</p>	
14.5 Medium Density Zone Rules					
79.	Residential	All controlled and RD rules re notification statements		<p>Consistent logic needs to be applied to the notification statements as follows:</p> <p>If the rule controls an internal occupant amenity matter or general street-scape outcomes then rule breaches should be non-notified as it is only the</p>	<p>1. Amend notification statements in both activity and built form rules to align with this logic.</p> <p>Non-notified:</p> <p>14.5.1.3 (RD1) – four or more units</p> <p>14.5.2.2 – landscaping</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>occupant who is affected or passers-by;</p> <p>If the rule it controls a neighbouring site interface matter then it should be open to an assessment re limited notification but should not be publicly notified. Ltd but not full;</p> <p>If it rule controls a matter that could impact on urban form at a neighbourhood scale e.g. height, then it should be open to a full s95 assessment.</p>	<p>14.5.2.5 – Outdoor Living Space</p> <p>14.5.2.8 – Outlook space</p> <p>14.5.2.9 – Fencing</p> <p>14.5.2.10 – Windows to street</p> <p>14.5.2.11 – Minimum unit size</p> <p>14.5.2.12 – Ground floor habitable space</p> <p>14.5.2.13 – Service and storage space</p> <p>14.5.2.15 – Garage and carports</p> <p>14.5.2.16 – Building reflectivity</p> <p>14.5.2.16 – mechanical ventilation</p> <p>14.5.2.18 – Spine road setbacks</p> <p>Open to limited but not public notification:</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
80.	Residential	Assessment matters	Oppose	The proposed assessment matters for both the '4 or more units' urban design rule and the built form rules are excessive and overlapping. Kāinga Ora seek that they are simplified and consolidated.	<ol style="list-style-type: none"> 1. For the 'non-notified' rules set out above, the matters for assessment are to be limited to the adequate provision of amenity for occupants and the delivery of a functional and attractive streetscape. 2. For the rules that potentially affect neighbouring sites set out above, additional matters relating to consideration of the amenity of neighbouring sites are appropriate. 3. For height, additional matters relating to urban form and proximity to services and public and active transport modes are appropriate, along with consideration of wind effects for buildings over 22m in height. 4. For the 4+ unit urban design rule, matters of discretion are sought to be as follows: <ol style="list-style-type: none"> a) <u>Whether the design of the development is in keeping with, or complements, the scale and character of development anticipated for the surrounding area and relevant significant natural, heritage and cultural features.</u>

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					<p>b) <u>The relationship of the development with adjoining streets or public open spaces including the provision of landscaping, and the orientation of glazing and pedestrian entrances;</u></p> <p>c) <u>Privacy and overlooking within the development and on adjoining sites, including the orientation of habitable room windows and balconies;</u></p> <p>d) <u>The provision of adequate outdoor living spaces, outdoor service spaces, waste and recycling bin storage including the management of amenity effects of these on occupants and adjacent streets or public open spaces;</u></p> <p><u>Where on-site car parking is provided, the design and location of car parking (including garaging) as viewed from streets or public open spaces</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
81.	Residential	14.5.1(P1) – Residential activity	support	<p>The proposed amendment to P1 to delete the limit on units with more than 6 bedrooms is supported. The definition of 'residential activity' includes emergency and refuge housing, and sheltered housing and so the amendment better enables such facilities to be established in the MRZ as a permitted activity where they provide accommodation for more than 6 residents.</p> <p>It is noted that boarding houses, student hostels, and retirement villages are separately defined and managed through separate rules.</p>	Retain rule as proposed.
82.	Residential	14.5.1(P3) – Elderly Persons Housing	Support in Part	Need to clarify – the Operative Plan P3 provides a permitted pathway for the conversion of Elderly Persons Housing to general tenure as a permitted activity. The provision of such a pathway is supported. PC14	<p>Either:</p> <ol style="list-style-type: none"> 1. Reinstate P3 so there is a clear permitted pathway; or 2. Include an advice note under P1 as follows:

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				<p>proposes to delete this pathway.</p> <p>The PC14 amendment is ambiguous as to whether the deletion of P3 means that conversion of EPH is no longer permitted, OR is it proposed to be deleted because there is now no such thing as an EPH because MDRS now enables multi-units so it is now implicit that you can convert existing EPH as such conversion would simply fall within the ambit of P1?</p> <p>Given the number of EPH in the City it is important that there is an unambiguous position on how their conversion is to be treated.</p>	<p><u>Conversion of existing Elderly Persons Housing is permitted under P1.</u></p>
83.	Residential	Controlled		<p>PC14 deletes existing rules controlling non-compliance with tree and garden planting, ground floor habitable space, and service spaces. These are all existing Operative Plan rules rather than MDRS rules. Given</p>	<p>Retain controlled activity status Rule 14.5.1.2.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				that they are being retained as built form standards (apart from the overhang rule), the existing controlled activity status are sought to also be retained.	
84.		RD1 – urban design assessment	Support	Support retention of non-notified clause	Retain as notified
85.		RD27 – wind assessment	Oppose	<p>While Kāinga Ora does not oppose the potential need for wind assessments on tall buildings (above 6 storey), the concern lays around appropriateness of Matters of Discretion, the proposed height limits triggering an assessment and technical expertise available to carry out these assessments or determine if assessments (or anticipated effects) are appropriate.</p> <p>Kāinga Ora seeks that the rule provide a permitted pathway. Buildings may separately breach height rules but that is a separate matter (just as they will also invariably require</p>	<ol style="list-style-type: none"> 1. Delete the rule. 2. As an alternative relief in the event that a regulatory approach to wind modelling is retained, redraft the rule to provide for a permitted pathway (for wind effects) where compliance with the specified performance standards is met. 3. Kāinga Ora seeks that the provisions relating to wind effects are moved to sit under the General Rules.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				consent under RD2 for more than 3 units).	
86.		D11 – industrial interface QM	Oppose	<p>Kāinga Ora considers that at the interface of industrial and residential zones the onus for managing effects rest primarily with the industrial activity. The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p> <p>Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be appropriate with the benefits of</p>	Delete the Industrial Interface Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				the QM not outweighing the costs.	
87.		14.5.2.1 – servicing advice note	Support in Part	<p>Servicing constraints mean that whilst resource consent could be granted, Building Consent could be declined if services are not available. Infrastructure constraints need to be readily searchable via on-line tool that can be readily updated, given that CCC presumably know where capacity limits are.</p> <p>The general onus is on Council to address constraints within Council-controlled networks via LTP and DC processes to enable MDRS.</p>	<ol style="list-style-type: none"> 1. Retain the advice note. 2. Kāinga Ora seek that Council investigate the provision of an on-line publicly searchable tool to enable timely identification of site constraints.
88.		14.5.2.2 – Landscaping and tree canopy	Oppose	In accordance with our submission seeking deletion of the tree canopy financial contribution rule, the landscaping and tree canopy rule is sought to be deleted and	<p>Delete rule and replace with the following:</p> <p><u>14.5.2.2 landscaped area.</u></p> <p><u>(1) A residential unit at ground floor level must have a landscaped area of a minimum of 20% of a developed site</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>replaced with the MDRS standard.</p> <p>An additional clause is proposed for non-residential activities that aligns with the MDRS outcomes.</p>	<p><u>with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p> <p><u>2. The landscaped area may be located on any part of the development site, and does not need to be associated with each residential unit.</u></p> <p><u>3. Non-residential activities must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p>
89.		14.5.2.3(i)a - Height	Support	Rule implements MDRS as per Schedule 3A	Retain rule as notified
90.		14.5.2.3(i)b – Height in local centre intensification precincts	Oppose	<p>The Local Centre Intensification Precincts are all located in close proximity to large suburban commercial centres such as Barrington and Bishopdale Malls. These areas are well placed to be HRZ.</p> <p>The areas within this precinct are sought to be rezoned to</p>	Delete clause.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				HRZ and therefore this clause can be deleted.	
91.		14.5.2.3(iv) Industrial interface and (v) Riccarton Bush	Oppose	<p>Kāinga Ora considers that at the interface of industrial and residential zones the onus for managing effects rest primarily with the industrial activity. The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p> <p>Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be</p>	Delete 14.5.2.3(iv) and 14.5.2.3(v).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>appropriate with the benefits of the QM not outweighing the costs.</p> <p>The area around Riccarton Bush is ideally located for supporting a High Density Residential Zone given its close proximity to a large town centre, cycleways, high frequency bus routes, and the large university activity hub</p>	
92.		14.5.2.4 – Building Coverage	Support in Part	<p>The rule implements MDRS as per Schedule 3A.</p> <p>Kāinga Ora support additional exemptions for eaves and guttering, although it is sought that this be extended to 600mm which is a standard eave depth and better provides for weather tightness design solutions. Eaves do not have a significant impact on visual dominance, and setbacks from neighbours are controlled through separate</p>	<p>Amend rule as follows:</p> <ol style="list-style-type: none"> a. The maximum building coverage must not exceed 50% of the net site area. b. ... c. <u>Eaves and roof overhangs up to 300mm 600mm in width and guttering up to 200mm in width form the wall of a building shall not be included in the building coverage calculation.</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				rules on internal setbacks and height-to-boundary.	
93.		14.5.2.5 – Outdoor living space	Support	The rule implements MDRS as per Schedule 3A	Retain rule as notified.
94.		14.5.2.6 – Height to boundary	Oppose	The provision as proposed is inconsistent with the MDRS.	Delete and replace with MDRS provision.
95.		14.5.2.7 – Building setbacks	Support in Part	<p>Support clauses (a)(i) and (ii) as implements MDRS as per Schedule 3A.</p> <p>Support clause (iii) enabling eaves and gutters to project into the road boundary setback. Extend the eave exemption to 600mm to align with standard building practice, along with enabling deeper porches which have a strong functional benefit. Such projections have a minimal impact on streetscape amenity and can have benefits through providing greater</p>	<p>1. Retain clause (a)(i) and (ii) as notified.</p> <p>2. Amend clause(a)(iii) as follows:</p> <p>Only road boundary: Eaves, and roof overhangs, and porches to a maximum of 300mm 600mm in width measured from the wall of a building and guttering up to 200mm in width.</p> <p>3. Amend clause (a)(iv) as follows:</p> <p>All other accessory buildings or garages, including garages that internally access a residential unit.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
				<p>articulation in the street-facing facade.</p> <p>Clause (iv) – support reduction in setbacks for accessory buildings, subject to the limitations to height and length in the rule. A grammatical amendment would be helpful to clarify that accessory buildings do not need to have internal access to the dwelling</p>							
96.		14.5.2.8 – Outlook space	Support	The rule implements MDRS as per Schedule 3A. The minor amendment to clause (i)(i) is supported.	Retain the rule as notified.						
97.		14.5.2.9 - Fencing	Support in Part	<p>Support 2m height limit on internal boundary fencing.</p> <p>The proposed rules will result in a significant loss of occupant amenity where outdoor living is located between the unit and the street. Whilst such a layout is not generally preferred, for east-west streets, the units on the southern side of the street</p>	<p>Retain clause (iii) as notified.</p> <p>Delete clauses (i) and (ii) and replace with the following (Operative Plan rule and associated diagrams reinstated):</p> <table border="1"> <thead> <tr> <th></th> <th>Fence type</th> <th>standard</th> </tr> </thead> <tbody> <tr> <td>i</td> <td>Where at least 50% of the fence structure is</td> <td>1.8m</td> </tr> </tbody> </table>		Fence type	standard	i	Where at least 50% of the fence structure is	1.8m
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i	Where at least 50% of the fence structure is	1.8m									

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
				<p>will face north where it can often result in good design outcomes for the outdoor living to be located between the unit and the street to take advantage of the northern orientation.</p> <p>Retain the Operative Plan rules on road frontage fencing which are well understood by the design community and achieve an appropriate balance in occupant amenity and streetscape outcomes.</p>	<table border="1"> <tr> <td data-bbox="1505 373 1585 437"></td> <td data-bbox="1585 373 1827 437"><u>visually transparent</u></td> <td data-bbox="1827 373 1986 437"></td> </tr> <tr> <td data-bbox="1505 437 1585 592"><u>ii</u></td> <td data-bbox="1585 437 1827 592"><u>Where less than 50% of the fence structure is visually transparent</u></td> <td data-bbox="1827 437 1986 592"><u>1.2m</u></td> </tr> </table>		<u>visually transparent</u>		<u>ii</u>	<u>Where less than 50% of the fence structure is visually transparent</u>	<u>1.2m</u>
	<u>visually transparent</u>										
<u>ii</u>	<u>Where less than 50% of the fence structure is visually transparent</u>	<u>1.2m</u>									
98.		14.5.2.10 – Windows to the street	Support in Part	<p>Clause (a) of the rule implements MDRS as per Schedule 3A.</p> <p>Clause (b) re excluding gables is supported.</p> <p>Clause (c) relating to units with large streetscene setbacks is also supported as the large setbacks mean that the streetscene outcomes sought by the rule are less relevant.</p>	<ol style="list-style-type: none"> 1. Retain clauses (a)-(d) as notified. 2. Delete clause (e). 						

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Clause (d) to incentivise front doors and their contribution towards an attractive street façade is supported.</p> <p>Clause (e), whilst trying to be enabling, adds considerable (and unnecessary) complexity to the rule for little gain.</p>	
99.		14.5.2.11 – Minimum unit size	Support	No amendments are proposed to the Operative Plan rule on minimum unit sizes. This rule is well-established and appears to be working well.	Retain rule as notified.
100.		14.5.2.12 – Ground floor habitable room	Support in Part	<p>The Operative Plan includes a rule controlling ground floor habitable rooms which is well-established and appears to be working well.</p> <p>There are two key design outcomes sought, namely 1) the ground floor on the road frontage is habitable space rather than garaging in order to deliver positive streetscape outcomes; and 2) that at least 50% of the ground floor across</p>	<p>Amend the rule as follows:</p> <p>a.— Any building that includes a residential unit shall:</p> <p>i.— Where the residential unit fronts a road or public open space, unless built over a separate ground floor residential unit, have a habitable room located at ground floor level with a minimum internal dimension of 3 metres; and</p> <p>ii.— Any residential unit shall have at least 50% of any ground floor area as habitable rooms.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>the site is habitable space, to avoid the ground floor of complexes being overly dominated by garaging and undercroft parking areas.</p> <p>The proposed rule is sought to be amended to better articulate these two outcomes and to avoid developments arranged as horizontally stacked low-rise apartments being unnecessarily penalised through a requirement for every unit to individually have ground floor space.</p> <p>As all MRZ now has a height limit of 11m or more, clause (b) requires amendment, noting that the outcomes of 50% habitable remains as a valid outcome for the small areas of MRZ that have a height of less than 11m through QMs.</p>	<p>a. <u>Where a residential unit fronts a road or public open space, it shall have a habitable room with a minimum internal dimension of 3 metres located at the ground floor level facing the frontage. This rule does not apply to upper-level units that are built over a separate ground floor residential unit; and</u></p> <p>b. <u>Where the permitted height limit is over 11m (refer to Rule 14.5.2.3), a minimum of 50% of the ground floor area across the site shall be occupied by habitable spaces and/or indoor communal living space. This area may include pedestrian access to lifts, stairs, and foyers.</u></p> <p>c. This rule does not apply to residential units in a retirement village.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
101.		14.5.2.13 - storage	Support in Part	<p>The requirement for outdoor storage for bins and washing lines is an Operative Plan rule that appears to be working well.</p> <p>Clause (a) relating to outdoor storage is supported, although may be an unnecessary level of regulation if this matter is adequately covered by urban design assessment matters.</p> <p>Clause (b) is a new rule in PC14. It requires a minimum amount of internal storage to be provided. Whilst internal storage spaces are useful, this rule is considered to be an unnecessary level of regulation.</p> <p>It is noted that clause (a) only applies to 4 or more units, while clause (b) applies to all units i.e. it is unclear what the rationale is behind the different number of units that trigger the clauses.</p>	<ol style="list-style-type: none"> 1. Retain clause (a). 2. Delete clause (b). 3. Alternatively storage could be addressed as an assessment matter for developments of 4 or more units.
102.		14.5.2.14 – Water supply for fire fighting	Neutral		

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
103.		14.5.2.15 – Garage location	Support in Part	<p>The location of car parking can have a significant impact on streetscape quality. A requirement to recess garaging or carports behind the front building line is supported.</p> <p>It is noted that this rule is only triggered where there are 4 or more units. It also does not apply to surface car parking areas which can also have a significant adverse effect on streetscape. Recessing is only required along the street frontage i.e. the rule must not apply to the front face of units located internally within a site.</p>	<p>Amend the rule as follows:</p> <p>14.5.2.15 garaging and carport building and parking area location</p> <p><u>When developing four or more residential units on a single site, where a residential unit fronts towards a road, any garage, or-carport shall be located at least 1.2 metres behind the front façade of a residential unit.</u></p>
104.		14.5.2.16 – Building reflectivity; and RD29	Oppose	<p>New rule that applies to the Residential Hills Precinct – Christchurch as had residential hill suburbs for over 100 years and these areas have not given rise to excessive glare issues from dwellings. Whilst rules controlling reflectivity can be appropriate in rural ONLs where the key outcome is to minimise the visibility of</p>	Delete rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>structures, such an outcome is not appropriate in residential suburbs where housing is an inherent part of the landscape.</p> <p>Requiring low light reflectance values means that buildings have to be finished in dark colours which can exacerbate urban heat island effects and require increased use of air conditioning to reduce unit heating in summer.</p>	
105.		<p>14.5.2.17 – Location of outdoor mechanical ventilation;</p> <p>And RD30</p>	Oppose	<p>New rule that requires a 3m setback if at ground level between a residential unit and the road or a shared accessway. Presumably it is visual effects that are the concern.</p> <p>The rule constitutes a level of design detail that is unnecessary to regulate. If mounted at ground level then even a short 1.2m high fence is sufficient to visually screen in a</p>	Delete the rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>similar manner to the proposed rule on bin storage.</p> <p>As drafted the rule applies to mechanical units on the ground, whereas they would be permitted if wall-mounted despite having a worse visual outcome. It also applies to mechanical units located adjacent to internal boundaries where the property next door (over the fence) has an accessway.</p>	
106.		14.5.2.18 – Spine Road setbacks	Oppose	<p>The new rule requires buildings and outdoor living spaces to be set back 4m from spine road corridors (where the corridor is less than 24m in width, which is the majority of the corridor given 20m road reserves are typical).</p> <p>It is understood that the intention of the rule is to enable road widening in the future to accommodate public rapid transit. If Council's intention is to acquire land in the future to</p>	<ol style="list-style-type: none"> 1. Delete the rule. 2. If land acquisition for public works is the intent, then Council should initiate a Notice of Requirement to designate the corridor.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>facilitate public works then it should use the designation powers available to it.</p> <p>Given the highly developed nature of these existing corridors with lengthy sections of commercial property built to the road boundary, it is unclear how any corridor-long road widening will occur without major land acquisition and demolition.</p>	
High Density Residential Zone					
107.		Controlled and Restricted Discretionary notification statements	Support in Part	<p>Consistent logic needs to be applied to the notification statements as follows:</p> <p>If the rule controls an internal occupant amenity matter or general street-scape outcomes then rule breaches are sought to be non-notified as it is only the occupant who is affected or passers-by;</p>	<p>Amend notification statements in both activity and built form rules to align with this logic.</p> <p>Non-notified:</p> <p>14.6.1.3 (RD2) – four or more units</p> <p>14.6.2.7 – landscaping</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>If the rule it controls a neighbouring site interface matter then it should be open to an assessment re limited notification but should not be publicly notified. Ltd but not full;</p> <p>If it rule controls a matter that could impact on urban form at a neighbourhood scale e.g. height, then it should be open to a full s95 assessment.</p>	<p>14.6.2.10 – Outdoor Living Space</p> <p>14.6.2.4 – Outlook space</p> <p>14.6.2.5 – Building separation</p> <p>14.6.2.6 – Fencing</p> <p>14.6.2.8 – Windows to street</p> <p>14.6.2.16 – Minimum unit size</p> <p>14.6.2.9 – Ground floor habitable space</p> <p>14.6.2.11 – Service and storage space</p> <p>14.6.2.14 – Garage and carports</p> <p>14.6.2.15 – mechanical ventilation</p> <p>14.6.2.17 – Spine road setbacks</p> <p>Open to limited but not public notification:</p> <p>14.6.2.12 – Building coverage</p> <p>14.6.2.2 – height to boundary</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					14.6.2.3 – internal boundary setbacks 14.6.2.13 – Water for Firefighting (FENZ only) Open to full s95 assessment: 14.6.2.1 – height
108.		Assessment matters	Oppose	The proposed assessment matters for both the ‘4 or more units’ urban design rule and the built form rules are excessive and overlapping. Kāinga Ora seeks that they be simplified and consolidated.	<ol style="list-style-type: none"> 1. For the ‘non-notified’ rules set out above, the matters for assessment are sought to be limited to the adequate provision of amenity for occupants and the delivery of a functional and attractive streetscape. 2. For the rules that potentially affect neighbouring sites set out above, additional matters relating to consideration of the amenity of neighbouring sites are appropriate. 3. For height, additional matters relating to urban form and proximity to services and public and active transport modes are appropriate, along with consideration of wind effects for buildings over 22m in height.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>4. For the 4+ unit urban design rule, matters of discretion are sought to be as follows:</p> <p>e) <u>Whether the design of the development is in keeping with, or complements, the scale and character of development anticipated for the surrounding area and relevant significant natural, heritage and cultural features.</u></p> <p>f) <u>The relationship of the development with adjoining streets or public open spaces including the provision of landscaping, and the orientation of glazing and pedestrian entrances;</u></p> <p>g) <u>Privacy and overlooking within the development and on adjoining sites, including the orientation of habitable room windows and balconies;</u></p> <p>h) <u>The provision of adequate outdoor living spaces, outdoor</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p><u>service spaces, waste and recycling bin storage including the management of amenity effects of these on occupants and adjacent streets or public open spaces;</u></p> <p>i) <u>Where on-site car parking is provided, the design and location of car parking (including garaging) as viewed from streets or public open spaces.</u></p>
109.		RD2 and RD6 – urban design	Support in Part	<p>RD2 is the Operative Plan rule that requires an urban design assessment for more than 3 units. Clause (a)(i) of the rule implements MDRS as per Schedule 3A.</p> <p>Clause (a)(ii) and (iii) are unnecessary as the assessment of projects that do not comply with garage location and ground floor habitable space are addressed through proposed rule RD20.</p>	<p>Retain clauses (a)(i) and (b)</p> <p>Delete clauses (a)(ii) and (iii).</p> <p>Delete rule RD6</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Given that the purpose of this rule is to enable an urban design assessment, rather than consideration of any built form rule breaches, the retention of the clause (b) 'not limited or publicly notified' clause is supported.</p> <p>Proposed RD6 simply duplicates the assessment required under RD2(a)(i) and therefore is unnecessary and is sought to be deleted.</p>	
110.		RD7 and RD 8 – building heights 14.6.2.1 - Height	Oppose	<p>The approach to managing height is unnecessarily over-complicated and seeks to introduce additional built form rules relating to outdoor living space and internal boundary setbacks as an activity standard.</p> <p>Kāinga Ora seek that the Plan be simplified so that the MRZ has a single height limit rule as per the MDRS (subject to QMs). What is currently the MDRS Local Centre</p>	<ol style="list-style-type: none"> 1. Delete these two activity rules. <p>Replace with:</p> <p><u>Buildings that do not meet Rule 14.6.2.1 Building Height.</u></p> <ol style="list-style-type: none"> 2. Retain matter of discretion reference to 'Impacts on neighbouring property – Rule 14.15.3a'. 3. Delete references to: Town Centre Intensification Precinct; and replace with 'Height Variation Overlay'.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Intensification Precinct is sought to be rezoned to HRZ.</p> <p>The HRZ is sought to have two height limit areas – a 22m limit for the majority of the area taking in what are currently the MRZ Local intensification precinct, and the Large Local Centre Intensification Precinct. The extent of the HRZ is proportionate to the size of the centre so large centres support a greater walkable catchment. But the height enabled in the HRZ remains the same at 22m.</p> <p>HRZ is sought 0-1.20km from the edge of the MCZ and the CCZ.</p> <p>A 36m 'Height Variation Control' is sought to apply 0-400m from the edge of the Metropolitan Centre Zone (as sought within this submission) (Riccarton, Hornby and Papanui centres).</p>	<p>4. Subject to the relief sought above, further consequential changes may be necessary to fully incorporate the effects of the zone changes discussed in the reason related to Metropolitan Centres.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>A 36m 'Height Variation Control' is sought to replace the High Density Residential Precinct and 0-400m from the edge of the CCZ.</p> <p>Rules controlling boundary setback, height to boundary, outdoor living space, and landscaping are all covered by other built form rules. The PC14 height to boundary rule requires at least a 6m setback from boundaries for buildings over 12m.</p> <p>Tall buildings are anticipated in the HRZ and therefore are sought to be permitted up to the height limit. Such buildings will remain subject to an assessment of qualitative urban design outcomes as covered by the urban design assessment matters for 4+ units.</p> <p>Buildings that exceed the height limits are RD, and subject to additional assessment of the</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				built form matters of discretion for height breaches.	
111.	Residential	14.6.1.3 RD13	Oppose	In accordance with our submission seeking deletion of the tree canopy financial contribution rule, the landscaping and tree canopy rule is sought to be deleted and replaced with the MDRS standard.	Delete the rule.
112.		RD17	Support in Part	<p>While Kāinga Ora does not oppose the potential need for wind assessments on tall buildings (above 6 storey), the concern lays around appropriateness of Matters of Discretion, the proposed height limits triggering an assessment and technical expertise available to carry out these assessments or determine if assessments (or anticipated effects) are appropriate.</p> <p>The rule should provide a permitted pathway. Buildings may separately breach height</p>	<ol style="list-style-type: none"> 1. Delete the rule. 2. As an alternative relief in the event that a regulatory approach to wind modelling is retained, redraft the rule to provide for a permitted pathway (for wind effects) where compliance with the specified performance standards is met. 3. Kāinga Ora seek that the provisions relating to wind effects are relocated to within the General Rules.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				rules but that is a separate matter (just as they will also invariably require consent under RD2 for more than 3 units).	
113.		D1 and NC1 –education, spiritual, heath, pre-school activities	Support in Part	<p>The Operative Plan has restrictive rules controlling non-residential activities within the City Centre (Four Avenues) due to historic pressure to develop such areas for non-residential use.</p> <p>The HRZ now extends much further than the City Centre, however the restrictive ‘4 Aves’ rules have been carried over so they now apply throughout the HRZ.</p> <p>The HRZ includes areas in close proximity to the larger commercial centres where the provision of a range of community facilities is very appropriate and has long been anticipated and provided for in the District Plan. Easy accessibility to such services</p>	<ol style="list-style-type: none"> 1. Retain Rule D1 for education, spiritual, heath, pre-school activities located inside the Four Avenues. 2. Adopt the MRZ provisions/ activity status for such activities located in the HRZ outside the Four Avenues.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>and facilities is likewise a key element in delivering well-functioning urban environments and good quality high density residential neighbourhoods.</p> <p>Whilst retention of the existing restrictive approach to such facilities inside the Four Avenues may be appropriate, the existing framework in the Residential Medium Density Zone is considered to be more appropriate for the HRZ areas outside of the Four Avenues.</p>	
114.		Add new provisions for retail, office, and commercial service activity on the ground floor of apartment buildings		It is common for apartment buildings to contain a small-scale commercial activity on the ground floor, often adjacent to the entrance foyer and as a means of buffering residential activity from what can be busy frontage roads. The provision of such services can likewise have significant convenience benefits for residents and is consistent with a good quality, high density neighbourhood. The ability to provide shared workspaces in	<p>Add a new restricted discretionary and fully discretionary rule as follows:</p> <p><u>Retail, office, and commercial service activity</u></p> <p><u>a. Activity status: Restricted Discretionary</u></p> <p><u>Where:</u></p> <p><u>i. The retail, office, or commercial service activity is limited to the</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>apartment buildings is consistent with emerging remote working trends where people still seek companionship during the day whilst working remotely from their employer. Provided the scale of non-residential facilities is limited there is minimal potential for such to undermine the role and function of nearby commercial centres which typically cover several hectares.</p>	<p><u>ground floor tenancy of an apartment building;</u></p> <p><u>ii. The gross floor area of the activity/activities does not exceed 200m²; and</u></p> <p><u>iii. The hours of operation are between:</u></p> <p><u>i. 7.00am and 9.00pm Monday to Friday; and</u></p> <p><u>ii. 8.00am and 7.00pm Saturday, Sunday, and public holidays.</u></p> <p><u>The Council's discretion shall be limited to the following matters:</u></p> <p><u>a. The design, appearance and siting of the activity;</u></p> <p><u>b. Noise and illumination;</u></p> <p><u>c. Signage.</u></p> <p><u>2. Activity status: Discretionary</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<u>Where compliance is not achieved with the matters specified in HRZ-RX(a)(i), (ii) and/or (iii).</u>
115.		14.6.2 – Built form standards note	Oppose	<p>The built form rules start with a new note that the standards apply “to all permitted activities and restricted discretionary RD2” i.e. 3+ units.</p> <p>This note is ambiguous as it implies that the built form standards do not apply to any non-residential activities or activities that breach other RD, D or NC rules.</p> <p>It is questionable whether the note is necessary, but if it is to be retained it would be better placed in the ‘how to use the rules’ section. Kāinga Ora seek that it simply state that in addition to being subject to the activity standards, all buildings are also subject to the built form rules.</p>	<p>1. Delete the note.</p> <p>2. As an alternative relief, if the note is to be retained, then relocate it to the ‘how to use the rules’ section 14.3 as follows:</p> <p><u>In addition to being subject to the activity standards, all buildings are also subject to the built form standards.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
116.		14.6.2.1 - Height	Support in Part	See discussion under RD7 and RD8 above.	Amend clause (a) of the rule as follows: a. Buildings must not exceed 14.22 metres in height above ground level; b. <u>Buildings located in the Height Variation Control overlay must not exceed 36 metres in height above ground level;</u>
117.		14.6.2.2 – Height to boundary	Support in Part	Kāinga Ora supports the encouragement of perimeter block development and building mass at front edge. However there is some concern over if the 20m, or 60% element of the provision is appropriate. For example, the 20m length should be increased to better align with standard block sizes in the High Density Zone. Kāinga Ora is also concerned, while the intent of the rule will achieve desired development outcomes, its drafting could be simplified.	Redraft provisions to improve clarity for plan users and ensure that dimensions referred to in the provision reflects block sizes within the High Density Zone.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
118.		14.6.2.3 - Setbacks	Support in Part	<p>Support clauses (a) and (b)(i) as implements MDRS as per Schedule 3A.</p> <p>Support clause (b)(ii) – support reduction in setbacks for accessory buildings, subject to the limitations to height and length in the rule. A grammatical amendment would be helpful to clarify that accessory buildings do not need to have internal access to the dwelling.</p> <p>Support clause (b)(iii) enabling eaves and gutters to project into the road boundary setback. Extend the eave exemption to 600mm to align with standard building practice, along with enabling deeper porches which have a strong functional benefit. Such projections have a minimal impact on streetscape amenity and can have benefits through providing greater articulation in the street-facing facade.</p>	<p>Retain clause (a) and (b)(i) as notified.</p> <p>Amend clause (b)(ii) and (iii) as follows:</p> <p>(b)This standard does not apply to site boundaries:</p> <p>(i)...</p> <p>(ii) side and rear setbacks: for accessory buildings or garages, including garages that internally access a residential unit, where the accessory building or garage is less than 3 metres in height and the total length of the building does not exceed 10.1m; and</p> <p>(iii) front boundary setbacks: where eaves, and roof overhangs, and porches up to 300mm 600mm in width and guttering up to 200mm in width from the wall of a building intrude into the boundary setback.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
119.		14.6.2.4 - Outlook Space	Support	Support as implements MDRS as per Schedule 3A. Minor amendment to clarify clause (i) is also supported.	Retain rule as notified
120.		14.6.2.5 – Building separation	Support in Part	<p>It is understood that the intent of the rule is to manage built form within the site i.e. the rule is to ensure separation between two towers on the same site, rather than provide separation with buildings on neighbouring sites (as separation to neighbours is managed through a combination of height to boundary, internal boundary setbacks and outlook space rules).</p> <p>The outcome of having reasonable space between taller built elements on the same site is supported, subject to the rule being amended to make its application clear.</p> <p>The other option is to delete the rule and rely on separation being addressed in part through the outlook space rule, plus</p>	<p>Delete the rule and replace as follows:</p> <p><u>Any parts of a building located more than 12m above ground level shall be separated by at least 10m from any other buildings on the same site that are also located more than 12m above ground level.</u></p> <p><u>Or alternatively, delete the rule entirely.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought									
				urban design assessment matters, and therefore this rule is unnecessary.										
121.		14.6.2.6 - Fencing	Support in Part	<p>Support 2m height limit on internal boundary fencing.</p> <p>The proposed rules will result in a significant loss of occupant amenity where outdoor living is located between the unit and the street. Whilst such a layout is not generally preferred, for east-west streets, the units on the southern side of the street will face north where it can often result in good design outcomes for the outdoor living to be located between the unit and the street to take advantage of the northern orientation.</p> <p>Retain the Operative Plan rules on road frontage fencing which are well understood by the design community and achieve an appropriate balance in occupant amenity and streetscape outcomes.</p>	<p>Retain clause (iii) relating to internal boundaries as notified.</p> <p>Delete clauses (i) and (ii) and replace with the following (Operative Plan rule and associated diagrams reinstated):</p> <table border="1"> <thead> <tr> <th></th> <th>Fence type</th> <th>standard</th> </tr> </thead> <tbody> <tr> <td>i</td> <td><u>Where at least 50% of the fence structure is visually transparent</u></td> <td><u>1.8m</u></td> </tr> <tr> <td>ii</td> <td><u>Where less than 50% of the fence structure is visually transparent</u></td> <td><u>1.2m</u></td> </tr> </tbody> </table>		Fence type	standard	i	<u>Where at least 50% of the fence structure is visually transparent</u>	<u>1.8m</u>	ii	<u>Where less than 50% of the fence structure is visually transparent</u>	<u>1.2m</u>
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i	<u>Where at least 50% of the fence structure is visually transparent</u>	<u>1.8m</u>												
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ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
122.		14.6.2.7 - Landscaping and tree cover	Oppose	<p>In accordance with our submission seeking deletion of the tree canopy financial contribution rule, the landscaping and tree canopy rule is also sought to be deleted and replaced with the MDRS standard.</p> <p>An additional clause is proposed for non-residential activities that aligns with the MDRS outcomes.</p>	<p>Delete rule and replace with the following:</p> <p><u>14.5.2.2 landscaped area</u></p> <p><u>(1) A residential unit at ground floor level must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p> <p><u>2. The landscaped area may be located on any part of the development site, and does not need to be associated with each residential unit.</u></p> <p><u>3. Non-residential activities must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p>
123.		14.6.2.8 - Windows to street	Support in Part	Clause (a) of the rule implements MDRS as per Schedule 3A.	<p>Retain clause (a)-(d) as notified.</p> <p>Delete clause (e).</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Clause (b) re excluding gables is supported.</p> <p>Clause (c) relating to units with large streetscene setbacks is also supported as the large setbacks meant that the streetscene outcomes sought by the rule are less relevant.</p> <p>Clause (d) to incentivise front doors and their contribution towards an attractive street façade is supported.</p> <p>Clause (e), whilst trying to be enabling, adds considerable (and unnecessary) complexity to the rule for little gain.</p>	
124.		14.6.2.9 – Ground floor habitable rooms	Support in Part	<p>The Operative Plan includes a rule controlling ground floor habitable rooms which is well-established and appears to be working well.</p> <p>There are two key design outcomes sought, namely 1) the ground floor on the road</p>	<p>Amend the rule as follows:</p> <p>a. Any building that includes a residential unit shall:</p> <p>i. Where the residential unit fronts a road or public open space, unless built over a separate ground floor residential unit, have a habitable room located at ground floor level</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>frontage is habitable space rather than garaging in order to deliver positive streetscape outcomes; and 2) that at least 50% of the ground floor across the site is habitable space, to avoid the ground floor of complexes being overly dominated by garaging and undercroft parking areas.</p> <p>The proposed rule is sought to be amended to better articulate these two outcomes and to avoid developments arranged as horizontally stacked low-rise apartments being unnecessarily penalised through a requirement for every unit to individually have ground floor space.</p> <p>The outcome of 50% habitable at ground floor across a site is an appropriate outcome for HRZ.</p>	<p>with a minimum internal dimension of 3 metres; and</p> <p>ii. Any residential unit shall have at least 50% of any ground floor area as habitable rooms.</p> <p>a. <u>Where a residential unit fronts a road or public open space, it shall have a habitable room with a minimum internal dimension of 3 metres located at the ground floor level facing the frontage. This rule does not apply to upper-level units that are built over a separate ground floor residential unit; and</u></p> <p>b. have at least 50% of any ground floor area as habitable rooms, except on sites where at least 25% of the building footprint is more than 4 storeys, which shall have at least 30% of any ground floor area as habitable rooms.</p> <p><u>A minimum of 50% of the ground floor area across the site shall be occupied by habitable spaces and/or indoor communal living space. This area may include pedestrian access to lifts, stairs, and foyers.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
125.		14.6.2.10 - Outdoor living space	support	<p>Clauses (a) and (b) implement MDRS as per Schedule 3A</p> <p>Clause (c) provides a useful reduction for studio/ 1 bed units to 15m² (ground floor) or 6m² balcony if located above ground floor.</p>	Retain rule as notified.
126.		14.6.2.11 – Storage space	Support in Part	<p>The requirement for outdoor storage for bins and washing lines is an Operative Plan rule that appears to be working well.</p> <p>Clause (a) relating to outdoor storage is supported, although may be an unnecessary level of regulation if this matter is covered by urban design assessment matters.</p> <p>Clause (b) is a new rule in PC14. It requires a minimum amount of internal storage to be provided. Whilst internal storage spaces are useful, this rule is considered to be an unnecessary level of regulation.</p>	<ol style="list-style-type: none"> 1. Retain clause (a), noting that if outdoor storage is addressed as an urban design assessment matter then a separate rule may be unnecessary. 2. Delete clause (b).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				It is noted that clause (a) only applies to 4 or more units, while clause (b) applies to all units i.e. it is unclear what the rationale is behind the different number of units that trigger the clauses.	
127.		14.6.2.12 - Building coverage	Support in Part	<p>The rule implements MDRS as per Schedule 3A.</p> <p>Support additional exemption for eaves and guttering, although this is sought to be extended to 600mm which is a standard eave depth and better provides for weather tightness design solutions. Eaves do not have a significant impact on visual dominance, and setbacks from neighbours are controlled through separate rules on internal setbacks and height-to-boundary.</p> <p>Clause (a)(ii) seeks to enable greater site coverage in the HRZ. An increase to 60% is supported and is a useful tool in differentiating between MRZ</p>	<ol style="list-style-type: none"> 1. Amend as follows: <ol style="list-style-type: none"> a. <u>The maximum building coverage must not exceed 50 60% of the net site area;</u> <ol style="list-style-type: none"> i. <u>Any eaves and roof overhangs up to 300mm 600mm in width and guttering up to 200mm in width from the wall of a building shall not be included in the building coverage calculation.</u> 2. Delete Clause (a)(ii).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				and HRZ. The proposed clause is however unnecessarily complex, with outdoor space and landscaping both subject to other rules and noting that the proposed ground floor habitable space rule will also necessitate the provision of ground floor outdoor living spaces.	
128.		14.6.2.13 – water supply for fire fighting	Neutral		
129.		14.6.2.14 - Garaging	Oppose	<p>Whilst the equivalent rule in the MRZ requires garaging to be recessed behind the front façade, this rule requires garaging to be located behind the rear façade of a residential unit.</p> <p>This rule is unworkable for carparking levels in apartment buildings where such parking is invariably located beneath (or above) a residential unit rather than behind the unit's rear façade.</p>	<p>Delete the rule and replace as follows:</p> <p><u>14.6.2.14 garaging and carports</u></p> <p><u>Where a residential unit fronts towards a road, any garage or carport shall be located at least 1.2 metres behind the front façade of a residential unit.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>For smaller scale developments ie. 2-3 storey, having parking recessed behind the front façade provides an acceptable outcome, in combination with the urban design assessment matters for 4+ units.</p> <p>The rule wording sought in the equivalent rule in the MRZ is considered to be equally applicable.</p>	
130.		14.6.2.15 – Location of mechanical ventilation	Oppose	<p>New rule that requires a 3m setback if at ground level between a residential unit and the road or a shared accessway. Presumably it is visual effects that are the concern.</p> <p>Level of design detail that is unnecessary to regulate. If mounted at ground level then even a short 1.2m high fence is sufficient to visually screen in a similar manner to the proposed rule on bin storage.</p>	Delete the rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				As drafted the rule applies to mechanical units on the ground, whereas they would be permitted if wall-mounted despite having a worse visual outcome. It also applies to mechanical units located adjacent to internal boundaries where the property next door (over the fence) has an accessway.	
131.		14.6.2.16 - Minimum unit sizes	Support	No amendments are proposed to the Operative Plan rule on minimum unit sizes. This rule is well-established and appears to be working well.	Retain rule as notified.
132.		14.6.2.17 - Spine road setbacks	Oppose	<p>The new rule requires buildings and outdoor living spaces to be set back 4m from spine road corridors (where the corridor is less than 24m in width).</p> <p>It is understood that the intention of the rule is to enable road widening in the future to accommodate public rapid transit. If Council's intention is to acquire land in the future to</p>	<p>Delete the rule.</p> <p>If land acquisition for public works is the intent, then Council should initiate a Notice of Requirement to designate the corridor.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>facilitate public works then it should use the designation powers available to it.</p> <p>Given the highly developed nature of these existing corridors with lengthy sections of commercial property built to the road boundary, it is unclear how any corridor-long road widening will occur without major land acquisition and demolition.</p>	
14.7 – Residential Hills Zone					
133.				<p>The Residential Hills zone is an existing Operative Plan zone that covers the Port Hills Suburbs. PC14 as notified includes a QM on public transport accessibility. Areas that fall within this QM retain their existing low-density Operative Plan zoning.</p> <p>It would appear that the public transport QM is the only QM</p>	Delete zone and replace with MDZ.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				that is generating the need to retain the Residential Hills Zone. Given our submission that the public transport QM is not a valid QM and is sought to be deleted, a consequence is that the Residential Port Hills Zone is also sought to be deleted and replaced by MRZ	
14.12 – Future Urban Zone					
134.				See above discussion on Objective 14.2.8. The Future Urban Zone ('FUZ') is a relabelling of Residential New Neighbourhood Zone. This is the wrong label and not the intention of the National Planning Standards. FUZ are a mechanism for signalling rural areas that will be urbanised at some point in the future as a holding pattern, with the 'live' zone to be developed at a later date through a subsequent plan change process. RNN are existing well-established live	Delete the FUZ and replace with MDRZ. The associated rules relating to build-out of these areas/ compliance with ODPs, or any area-specific rules can equally be located at the end of the MDRZ provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				zones (albeit that some of them are still being built out). These areas are sought to simply be MDRZ unless there is a qualifying matter in play that would preclude MDRZ zoning.	
14.14 – Community Housing Redevelopment Mechanism					
136.	Chapter 14.14 – Community Housing Redevelopment Mechanism	Whole Chapter	Support	Kāinga Ora supports the deletion of the Community Housing Redevelopment Mechanism, provided Plan Change 14 is consistent with the MDRS and NPS-UD.	Kāinga Ora supports the deletion of the Community Housing Redevelopment Mechanism, provided Plan Change 14 is amended consistent with the relief sought in this submission.
Chapter 15 - Commercial					
137.		Related to the commercial chapter as a whole	Support in part	Kāinga Ora seeks that Metropolitan Centres are introduced within the centres hierarchy, as per the forward-looking aspects of the NPS-UD policies of 1, 3, and 6. These are sought to cover the existing key activity areas for Riccarton, Papanui, and Hornby. The size,	<ol style="list-style-type: none"> 1. Insert reference to Metropolitan Centres in all relevant provisions of the chapter. 2. Insert rules for metropolitan centre zone as attached in Appendix 2.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>scale, existing and future function of these centres are such that they merit the application of a Metropolitan Centre Zone classification, and thus an appropriate objective, policy and rules framework.</p> <p>Further, recent and proposed investment in public and active transport modes along the corridors in which these activity centres are located support the case for a zoning classification reflective of their relative position within the centres hierarchy.</p>	
Chapter 15.2 – Commercial Policy framework					
138.		Policy 15.2.2.1, Table 15.1 – Commercial zone titles	Support in part	<p>Support amendments to Table 15.1 of Policy 15.2.2.1 in so far as these reflect National Planning Standards nomenclature.</p> <p>Kāinga Ora</p>	<p>Realignment of Commercial Zone names with National Planning Standard (NPS) zone descriptions (Chapter 2 Interpretation). The allocation of centres to the NPS labelling appears generally appropriate if Metropolitan Centre is added.</p> <p>B. Town Centre: Key Activity Centre:</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>Retain reference to '<i>High Density Housing is contemplated ... and around larger local centres</i>'.</p> <p>C. Local Centres: Retain reference to '<i>High Density Housing is contemplated ... and around larger local centres</i>'.</p>
138.		Table 15.1 - Centre hierarchy		<p>The role and function of centres has a direct bearing on the associated geographic extent and zoning of high density residential zoning around the centre. The hierarchy needs to reflect both current condition and potential future state in the event that enabled development occurs.</p> <p>The centre hierarchy for Local Centres in particular is considered to be unnecessarily complex and it is sought that these be simplified, along with a commensurate simplification in the heights and zoning of the surrounding residential area.</p>	<ol style="list-style-type: none"> 1. Amend role and function of Church Corner, Sydenham and Merivale from 'Local Centre (Large)' to 'Town Centre'. 2. Consolidate all Local Centres into a simple category i.e. delete the distinction between 'small' and 'medium'. 3. Incorporate Metropolitan centres and relabel Riccarton, Hornby, Papanui Northlands as such and as shown within Appendix 3.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Church Corner, Sydenham and Merivale are evolving and will be establishing a substantial residential catchment through development enabled by PC14. In addition, these 'centres' are positioned within corridors identified as Mass Transit Network and Growth Corridors within the Greater Christchurch 'Huihui Mai' Consultation Plan for accommodating Growth to 2050. The corresponding Council s32 Report 'Commercial Appendix 2' identifies such centres as performing a greater role in intensification enablement and diversity of function.</p> <p>The large local centres should be town centres, with small and medium local centres merged into a single 'local centre' category.</p>	
139.		Policy 15.2.2.7 – Residential activity in centres	Support in part	Amend so that the provision also provides for residential activity within Neighbourhood centres. Rule 15.5.1.1.1(P19)	Amend Policy 15.2.2.7 as follows: Residential activity in district Town, and

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				provides for such above ground floor, or to the rear of the premises fronting the street.	Local <u>and neighbourhood</u> centres Residential activity in district town , <u>and</u> Local <u>and neighbourhood</u> neighbourhood centres
140.		Objective 15.2.3(b) – Mixed use areas	Support in part	<p>Kāinga Ora support the principle of providing for Mixed Use Zones proximate to the City Centre Zone to transition to higher density residential neighbourhoods.</p> <p>The application of the provision is unclear however. The ‘Objective Heading’ refers to mixed use <u>outside the central city</u>. Central City is defined (in the operative Plan) as that part of the City contained within the four avenues. Whereas the amendment to Chapter 2 Interpretation to introduce ‘City Centre – means the City Centre Zone’.</p> <p>This confusion is then reinforced in Policy 15.2.3.2 where the ‘heading’ references Mixed Use Zones outside the central city, then conflicts with</p>	<p>Amend the objective as follows:</p> <p>15.1.1 Objective - Office parks and mixed use areas <u>outside the central city (except the Central City Mixed Use and Central City Mixed Use (South) Zones)</u>.</p> <p>a. Recognise the existing nature, scale and extent of commercial activity within the Commercial Office and Commercial Mixed Use Zones, but avoid the expansion of existing, or the development of new, office parks and/or mixed use areas.</p> <p>b. <u>Mixed use zones located within a 15min walking distance of close to the City Centre Zone transition into high density residential neighbourhoods that contribute to an improved</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>(b) which references increased opportunities within a 15 minute walking distance of the City Centre Zone (which would therefore include the Commercial Central City Mixed Use and Central City Mixed Use (South Frame) zones). If the aim is to deliberately exclude the Central City Mixed Use and South Frame Zones, this should be made clear, and Policy 15.2.7.1 'Diversity of Activities' amended to encourage a transition into good quality residential neighbourhoods.</p> <p>'Close' should be replaced by explicit reference to the respective zones (presumed to be the 15-minute walking distance in Policy 15.2.3.2(b)).</p> <p>Referencing a reduction in greenhouse gas emissions is superfluous in this context, given proximity and modal choice.</p>	<p><u>diversity of housing type, tenure and affordability</u> and support a reduction in greenhouse gas emissions.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>The intent and objectives of these amendments to the plan change do not seem to be achievable through the rules proposed. Kāinga Ora submits that it may be more appropriate to consider these zone changes and rules through a subsequent schedule 1 process.</p>	
141.		Policy 15.2.3.2 – Mixed use	Support in part	<p>Amend ‘outside the central city’ as above.</p> <p>A ‘high quality’ residential neighbourhood is subjective and is referenced in terms of residential zone outcomes (Objective 14.2.4). Such is an inappropriately high threshold for residential development in a transitioning and Mixed Use zone. Contributing positively to quality and design is sufficient.</p> <p>Delete reference to ‘reducing greenhouse gas emissions’ as this would be immaterial at this scale, and the areas are zoned for mixed use which anticipates residential activity being</p>	<p>Amend as follows: 15.2.3.2 Policy – Mixed use areas outside the central city (except the Central City Mixed Use and Central City Mixed Use (South) Zones)</p> <p>a. Recognise the existing nature, scale and extent of retail activities and offices in mixed use zones outside the central city in Addington, New Brighton, off Mandeville Street and adjoining Blenheim Road, while limiting their future growth and development to ensure commercial activity in the City is focussed within the network of commercial centres.</p> <p>b. Support mixed use zones at</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>proximate to necessary facilities / employment thereby reducing trip journeys. Support for greater housing diversity and including 'alternative housing models' although noting that these are not well defined (Chapter 2 Interpretation).</p> <p>The greenway requirements in Appendix 15.15.12 and 15.15.13 are problematic to implement given the fragmented ownership of these areas. The provision of small parks and greenlinks is a matter for Council to facilitate through LGA processes and a more comprehensive place-making programme that will be vital in supporting a shift from industrial to mixed use neighbourhoods. If specific greenlinks are considered to be vital then the Council should use its designation powers to secure these spaces as a more efficient and effective method than the proposed comprehensive housing rules.</p>	<p><u>Sydenham, Addington, off Mandeville Street, and Philipstown located within a 15 minute walking distance of the City Centre Zone, to transition into high good quality residential neighbourhoods by:</u></p> <ol style="list-style-type: none"> i. <u>enabling comprehensively designed high-good-quality, high-density residential activity;</u> ii. <u>ensuring that the location, form and layout of residential development supports the objective of reducing greenhouse gas emissions and provides for greater housing diversity including alternative housing models;</u> iii. <u>requiring developments to achieve a high-good standard of on-site residential amenity to offset and improve the current low amenity industrial environment and mitigate potential conflicts between</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>uses;</p> <p>iv. <u>encourage small-scale building conversions to residential use where they support sustainable re-use and provide high-good quality living space, and contribute to the visual interest of the area.</u></p> <p>c. Avoid Comprehensive Residential Development of sites within the Comprehensive Housing Precinct that are identified in Appendix 15.15.12 and 15.15.13 unless the relevant shared pedestrian/cycleway, greenway or road connection is provided.</p> <p>d. For sites identified within Appendix 15.15.12 and 15.15.13 encourage the connection to facilitate convenient and accessible through block connectivity.</p>
142.		Objective 15.2.4 – urban form	Support	No changes necessary.	Retain the objective as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
143.		Policy 15.2.4.1 – scale and form	Support in part	<p>The foundation of this policy is found within Policy 3 of the NPS – UD. That Policy requires at clause (a) within city centre zones, building heights and density of urban form to realise as much development capacity as possible. Accordingly, the current wording of clause (i) to (v) which seek to limit building height is not supported.</p> <p>For clause (b)(i) the duplication associated with the amendment can be removed.</p> <p>For clause(b)(ii) it is considered that the District Plan should be forward looking, hence the need for building heights to be commensurate with their 'anticipated' role.</p>	<p>1. Amend Clause (a) as follows:</p> <p>15.2.4.1 Policy – Scale and form of development</p> <p>a. Provide for development of a significant scale and form <u>massing that reinforces the City's City Centre Zone's distinctive sense of place and a legible urban form by enabling as much development capacity as possible to maximise the benefits of intensification, whilst managing building heights adjoining Cathedral Square, Victoria Street, New Regent High Street and the Arts Centre to account for recognised heritage and character values.</u> in the core of District Centres and Neighbourhood Centres, and of a lesser scale and form on the fringe of these centres.</p> <p>2. Delete Clause (a)(i)-(v).</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>1. Amend Clause (b) as follows:</p> <p>b. The scale and form of development in other commercial centres shall:</p> <ul style="list-style-type: none"> i. reflect the context, character and the anticipated scale of the zone and centre's function by: ii. providing for the tallest buildings and greatest scale of development in the city centre to reinforce its primacy for Greater Christchurch and enable as much development capacity as possible to maximise the benefits of intensification;... <p>2. Retain the remaining parts of clause (b) as notified.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
144.		Policy 15.2.4.2 - design	Oppose	There is no basis within the MDMR Act nor NPS-UD that facilitates or provides support for the inclusion of these provisions. It is considered that the provisions introduced would function to limit or reduce potential development capacity. The provisions are not accompanied by a comprehensive s32, do not adequately recognise the functional requirements associated with commercial developments, and would not be the more appropriate in terms of achieving Objective 3.3.1 and 3.3.2 of the Plan.	Delete all inclusions introduced and retain existing Operative Plan Policy 15.2.4.2.
145.		Policy 15.2.4.6 – Strategic Infrastructure	Support in Part	This policy contains operative plan wordings using the term ‘avoiding’ in relation to noise sensitive activities and the Airport Noise Influence Area, we seek amendment to this wording to reflect management solutions are appropriate.	Amend policy 15.2.4.6 as follows: Provide for the effective development, operation, maintenance and upgrade of strategic infrastructure and avoid adverse effects of development on strategic infrastructure through managing the location of activities and the design of stormwater areas. This includes but is not limited to, managing noise sensitive activities within commercial zones

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					located within the 50-dB Ldn Air Noise Contour and within the Lyttelton Port Influences Overlay Area.
146.		Objective 15.2.5(a)(i)	Support in Part	This policy contains existing Operative Plan wording that's no longer appropriate "...and limiting the height of buildings to support an intensity of commercial activity across the zone".	Amend Objective 15.2.5 as follows: <ul style="list-style-type: none"> a. A range of commercial activities, community activities, cultural activities, residential activities and guest visitor accommodation are supported in the Central City to enhance its viability, vitality and the efficiency of resources, while encouraging activities in specific areas by: <ul style="list-style-type: none"> i. Defining the Commercial Central City Business City Centre Zone as the focus of retail activities and offices and limiting the height of buildings to support an intensity of commercial activity across the zone;

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
147.	Central City	Policy 15.2.6.3 - Amenity	Support in part	<p>Deletion of the operative clause (ii) is supported.</p> <p>Seek deletion or amendment of inserted clause (ii) which acts as a proxy to otherwise limit height contrary to the statutory requirement of Policy 3 of the NPS-UD.</p>	<ol style="list-style-type: none"> 1. Support the deletion of existing clause (a)(ii). 2. Delete the replacement Clause (a)(ii).
148.	Central City	Policy 15.2.6.4 – Residential intensification	Support in part	<p>Seek moderation of the qualifier 'high quality' to either good, or 'positively contributes'.</p>	<p>Amend Policy 15.2.6.4(a) as follows:</p> <p>Encourage the intensification of residential activity within the Commercial Central City Business City Centre Zone by enabling high-good quality residential development that positively contributes to supports a range of types of residential development typologies, tenures and prices, with an appropriate level of amenity including:...</p>
149.	Central City	Policy 15.2.6.5 – Pedestrian focus	Oppose	<p>Delete the PC14 amendment relating to 'wind generation'. It is not considered that the respective s32 analysis demonstrates that such limits/</p>	<p>Amend Policy 15.2.6.5(ii) as follows:</p> <ol style="list-style-type: none"> ii. requiring development to support a

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				wind rules are the most efficient or effective method.	pedestrian focus through controls over building location and continuity, weather protection, height, wind generation , sunlight admission, and the location of parking areas;
150.	Central City Mixed Use Zone	Objective 15.2.7 – central city mixed use	Oppose	Delete insertion of reference to 'high quality' as inappropriate in this context.	15.2.7 Objective – Role of the Central City Mixed Use Zone a. The development of vibrant, high good quality urban areas where a diverse and compatible mix of activities can coexist in support of the Commercial Central City Business City Centre Zone and other areas within the Central City Central City .
151.	Central City Mixed Use Zone	Policy 15.2.7.1 – diversity of activities	Support in part	The Central City mixed use zone is well located within easy walking and cycling distance of the wide range of services and facilities on offer. As such the height limit is sought to reflect such proximity and not be tagged or limited to colocation with large faculties, as the whole of the zone is well-	<u>Amend Clause (a)(viii) as follows:</u> <u>viii. opportunities for taller buildings to accommodate residential activity and visitor accommodation, to support the vibrancy of the City Centre Zone, where co-located with the and the nearby large-scale community facilities, Te Kaha</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				located in close proximity to these facilities.	<u>and Parakiore.</u>
152.	Central City Mixed Use Zone	Policy 15.2.8.1 - usability, Policy 15.2.8.2 - amenity	Oppose	<p>The amenity provisions introduced are too fine grain to be set as policies, are unsubstantiated by s32 analysis, do not respond to a resource management issue, and would act as detriment to development. Kāinga Ora seek that these be deleted.</p> <p>Policy 15.2.8.2(viii) is not opposed, subject to the amendments sought above as to setting an appropriate urban design context, and not set at 'high quality'.</p>	<ol style="list-style-type: none"> 1. Retain Policy 15.2.8.1 as existing in the Operative Plan and delete all PC14 amendments. 2. Retain Policy 15.2.8.2 as existing in the Operative Plan and delete all PC14 amendments, with the exception of clause (viii) which is sought to be retained.
153.	Central City Mixed Use Zone	Policy 15.2.8.3 – residential development	Oppose	The requirements in the NPS-UD to facilitate differing housing typologies and provide intensification opportunities is disabled by provisions seeking excessive private amenity space.	<p>Delete amendments seeking improved private amenity space, compensatory to the predominantly commercial nature of the Central City Mixed Use Zone.</p> <p>15.2.8.3 Policy Residential Development</p> <p>a. provide for ...</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>b. <u>Require a level of private amenity space for residents that is proportionate to the extent of residential activity proposed.</u> and which compensates for the predominantly commercial nature of the area, including consistent with the intended built form and mix of activities within that environment, through:...</p>
154.	Central City Mixed Use Zone (South Frame)	Policy 15.2.10.2 – residential development	Support	Policy amendments appropriately recognise area context.	Retain policy as notified
15.4 – Commercial Zone rules					
155.	Town Centre Zone Rules Local Centre Rules Neighbourhood Centre Zone	City Spine Transport Corridor 15.4.1.3(RD8) 15.5.1.3(RD8) 15.6.1.3(RD7)	Oppose	Delete the provision in its entirety. The provision is not justified in terms of s32, is not the most appropriate mechanism to secure increased road widths, or proxy road reserve planting and landscaping at the expense of developable area. Provision and Qualifying matter is not	Delete all City Spine Transport Corridor activity rules from the suite of commercial zones.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	Large Format Retail Zone Mixed Use Zone	15.8.1.3(RD3) 15.10.2.10		supported by Policy 4/ clause 3.32 of the NPS-UD. Inconsistency with design outcomes specified in Rule 15.4.2.3, including clause (i) Key Pedestrian Frontages as associated with Riccarton, Church Corner, Merivale and Papanui Centres. If road widening is required to facilitate rapid transit infrastructure then Council should use its designating powers.	
156.	Town Centre Zone Built Form Standards Local Centre Built Form Standards	15.4.2.1(a)(ii) 15.5.2.1(a)(i)	Oppose / cl16(b)	Delete erroneous reference to Local Centre in 15.4.2.1(a)(ii) Delete erroneous reference to Town Centre in 15.5.2.1(a)(i)	ii. 1,000m² GLFA where located in a Neighbourhood Local Centre identified in Policy 15.2.2.1, Table 15.1 ii. 4,000m² GLFA where located in a District Town Centre as identified in Policy 15.2.2.1, Table 15.1; or
157.	Town Centre Zone Built Form Standards	14.4.2.2 Maximum Building Height	Support in part	Increased development capacity is sought to be enabled specifically at Hornby,	1. Adopt Metropolitan Centre Zone Rules proposed in the Kāinga Ora submission Appendix 2 and amend

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought												
				<p>Riccarton and Papanui noting that the role and function of these centres is already straddling that associated with the role and function of Metropolitan Centres as set out within the National Planning Standards. The adoption of the Metropolitan Centre Rules Kāinga Ora seeks would take into account that role and function (including social amenity) would be anticipated to grow and diversify given the anticipated level of residential catchment growth. An appropriate height limit is accordingly 36m.</p> <p>For the remaining Town Centres, noting anticipated corridor growth and development as associated with Sydenham, Merivale and Church Corner (elevating these centres to Town Centres in the retail hierarchy) (refer submission to Table 15.1) a height limit of 22m is the more appropriate.</p>	<p>these rules as appropriate.</p> <p>2. Amend rule 14.4.2.2 as follows:</p> <p>a. The maximum height of any building shall be as follows:</p> <table border="1" data-bbox="1547 603 2002 1023"> <thead> <tr> <th data-bbox="1547 603 1608 660"></th> <th data-bbox="1608 603 1843 660">Applicable to</th> <th data-bbox="1843 603 2002 660">Standard</th> </tr> </thead> <tbody> <tr> <td data-bbox="1547 660 1608 799">i.</td> <td data-bbox="1608 660 1843 799">All sites in a District Town Centre (other than specified below)</td> <td data-bbox="1843 660 2002 799">220 metres</td> </tr> <tr> <td data-bbox="1547 799 1608 963">ii.</td> <td data-bbox="1608 799 1843 963">All sites in a Town Centre at Riccarton, or Hornby or Papanui</td> <td data-bbox="1843 799 2002 963">22 metres</td> </tr> <tr> <td data-bbox="1547 963 1608 1023">iii.</td> <td data-bbox="1608 963 1843 1023">...</td> <td data-bbox="1843 963 2002 1023"></td> </tr> </tbody> </table>		Applicable to	Standard	i.	All sites in a District Town Centre (other than specified below)	220 metres	ii.	All sites in a Town Centre at Riccarton, or Hornby or Papanui	22 metres	iii.	...	
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iii.	...																

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158.	Town Centre Zone Built Form Standards	Sunlight and Outlook 15.4.2.5	Oppose in part	Refer submission point relating to amended Recession Planes as a Qualifying Matter and changes to Appendix 14.16.2.	Consequential amendments associated with Appendix 14.16.2. Adopt Metropolitan Centre Zone Rules proposed in the Kāinga Ora submission Appendix 2 and amend these rules as appropriate.
	Local Centre Zone Standards	15.5.2.5			
	Neighbourhood Centre Zone Standards	15.6.2.4			
	Large Format Zone	15.8.2.4			
	Commercial Office Zone	15.9.2.4			
	Mixed Use Zone	15.10.2.4			
	City Centre Zone	15.11.2.9			
	Central City Mixed Use Zone	15.12.2.6			

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
159.	Town Centre Zone Built Form Standards Local Centre Zone Standards Neighbourhood Centre Zone Standards Large Format Zone Mixed Use Zone City Centre – Mixed Use Zone	City Spine Transport Corridor 15.4.2.10 15.5.2.10 15.6.2.11 15.8.2.13 15.10.1.3 (RD5) 15.12.2.13 / 15.12.1.3(RD6)	Oppose	Delete the provision in its entirety. The provision is not justified in terms of s32, is not the most appropriate mechanism to secure increased road widths, or proxy road reserve planting and landscaping at the expense of developable area. Provision and Qualifying matter is not supported by Policy 4/ clause 3.32 of the NPS-UD.	Delete all City Spine Transport Corridor built form rules from the suite of commercial zones.						
160	Local Centre Zone Built Form Rules – Maximum Building Height	15.5.2.2		Support in part As identified in the submission point on Town Centre heights – Merivale, Church Corner and Sydenham are sought to be elevated to a 'Town Centre' zone and provided with a 22m height limit.	Replace the table in 15.5.2.2 as follows (with Merivale, Church Corner and Sydenham elevated in Table 15.1 to Town Centre zoning): <table border="1" data-bbox="1547 1155 2002 1318"> <thead> <tr> <th></th> <th>Applicable to</th> <th>Standard</th> </tr> </thead> <tbody> <tr> <td>ii</td> <td>Ferrymead and all sites in a Local Centre (medium)</td> <td>20 metres</td> </tr> </tbody> </table>		Applicable to	Standard	ii	Ferrymead and all sites in a Local Centre (medium)	20 metres
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ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought												
				<p>In the alternative, they are sought to be afforded a 22m height limit as Local Centre (Large).</p> <p>As sought above the remaining medium centres and Ferrymeed are sought to become 'large' Local Centres, with the 'small' Local Centres simply being 'local centres'.</p> <p>In terms of heights, the new large centres are sought to have a consistent 22m height limit to provide for additional capacity and conformity with the proposed HRZ height limits adjoining these centres within this submission. The exception is New Brighton, given qualifying matters associated with appropriate natural hazards reduce intensification opportunities.</p> <p>All remaining Neighbourhood Centres are sought to have a standard height limit of 14m to provide a scale commensurate</p>	<table border="1" data-bbox="1547 373 2002 727"> <tr> <td data-bbox="1547 373 1854 531"></td> <td data-bbox="1854 373 2002 531"><u>as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u></td> <td data-bbox="1854 531 2002 727"></td> </tr> <tr> <td data-bbox="1547 531 1854 727">ii.</td> <td data-bbox="1854 531 2002 727"><u>New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1</u></td> <td data-bbox="1854 531 2002 727"><u>14metres</u></td> </tr> </table> <p>Or in the alternative:</p> <p>15.5.2.2 Maximum building height</p> <p>a. The maximum height of any building shall be as follows:</p> <table border="1" data-bbox="1547 1002 2002 1318"> <thead> <tr> <th data-bbox="1547 1002 1599 1059"></th> <th data-bbox="1599 1002 1861 1059">Applicable to</th> <th data-bbox="1861 1002 2002 1059">Standard</th> </tr> </thead> <tbody> <tr> <td data-bbox="1547 1059 1599 1318">i</td> <td data-bbox="1599 1059 1861 1318"><u>Merivale, Church Corner and Sydenham North (Colombo Street between Brougham Street and Moorhouse Avenue)</u></td> <td data-bbox="1861 1059 2002 1318"><u>22 metres</u></td> </tr> </tbody> </table>		<u>as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u>		ii.	<u>New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1</u>	<u>14metres</u>		Applicable to	Standard	i	<u>Merivale, Church Corner and Sydenham North (Colombo Street between Brougham Street and Moorhouse Avenue)</u>	<u>22 metres</u>
	<u>as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u>																
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ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought															
				with the surrounding MRZ areas and to differentiate from the 12m height limit applying to Neighbourhood Centres.	<table border="1"> <tbody> <tr> <td data-bbox="1547 373 1592 635">ii</td> <td data-bbox="1592 373 1861 635">Ferrymead and all sites in a Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</td> <td data-bbox="1861 373 2002 635">20 metres</td> </tr> <tr> <td data-bbox="1547 635 1592 831">ii.</td> <td data-bbox="1592 635 1861 831">New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1</td> <td data-bbox="1861 635 2002 831">14 metres</td> </tr> <tr> <td data-bbox="1547 831 1592 906">i.</td> <td data-bbox="1592 831 1861 906">All sites in a District Centre</td> <td data-bbox="1861 831 2002 906">20 metres</td> </tr> <tr> <td data-bbox="1547 906 1592 1102">ii.</td> <td data-bbox="1592 906 1861 1102">Any building in a District Centre within 30 metres of an internal boundary with a residential zone</td> <td data-bbox="1861 906 2002 1102">12 metres</td> </tr> <tr> <td data-bbox="1547 1102 1592 1331">iii. i.</td> <td data-bbox="1592 1102 1861 1331">All sites in a Neighbourhood Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1.</td> <td data-bbox="1861 1102 2002 1331">12 metres</td> </tr> </tbody> </table>	ii	Ferrymead and all sites in a Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.	20 metres	ii.	New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1	14 metres	i.	All sites in a District Centre	20 metres	ii.	Any building in a District Centre within 30 metres of an internal boundary with a residential zone	12 metres	iii. i.	All sites in a Neighbourhood Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1.	12 metres
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iii.	<u>All sites in a Neighbourhood Local Centre (large) as identified in Table 15.1 of Policy 15.2.2.1.</u>	20 metres												
161.	Neighbourhood Centre Zone – Built Form Standards	15.6.2.1 - Height	Support in part	<p>The increase in height of buildings from 8m to 12m is supported.</p> <p>Within the Central City, an increased height to 32m is the more appropriate, given these areas are surrounded by HRZ.</p>	<p>Amend rule 15.6.2.1 as follows:</p> <p>15.6.2.1 Maximum Building Height</p> <p>a. The maximum height of any building shall be as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Applicable to</th> <th>Standard</th> </tr> </thead> <tbody> <tr> <td>i.</td> <td>All sites unless specified below</td> <td>8 <u>12</u> metres</td> </tr> <tr> <td>ii.</td> <td><u>For sites within the Central City</u></td> <td></td> </tr> </tbody> </table>		Applicable to	Standard	i.	All sites unless specified below	8 <u>12</u> metres	ii.	<u>For sites within the Central City</u>	
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ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>appropriate and set appropriate limits on activity size to ensure effects of larger facilities are able to be assessed.</p> <p>Such activities do not generally give rise to retail distribution effects, and will not give rise to reverse sensitivity effects given the clear change in outcomes sought for these areas and the enablement of residential activity throughout the mixed use zone.</p>	
163.	Mixed Use Zone	15.10.2.1 - Height	Support in part	<p>The insertion of (b) providing for higher intensity of residential development is supported. However a height limit of 22m is considered the more appropriate for consistency with the height limits proposed within this submission, and appropriate levels of enablement, along with the unnecessary need to differentiate between the heights of buildings depending on where they are located on the site.</p>	<p>Amend rule 15.10.2.1 as follows:</p> <p>Maximum building height</p> <ol style="list-style-type: none"> a. The maximum height of any building shall be 15 metres, <u>unless specified below.</u> b. <u>The maximum height of any Comprehensive Residential Development located within the Comprehensive Housing Precinct (shown on the</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>planning maps) shall be 21 22 metres, for buildings located adjacent to the street, or 12 metres for buildings located at the rear of the site.</p>
164.	Mixed Use Zone – Comprehensive Residential Development	<p>15.10.1.1(P27)</p> <p>15.10.1.3 (RD3 / RD4) Comprehensive Residential Development</p> <p>15.10.2.9 Minimum Standards for Comprehensive Residential Development.</p> <p>15.14.3.40 Assessment Matters Comprehensive Redevelopment</p> <p>15.10.1.5(NC3)</p> <p>Appendix 15.15.12 – Sydenham and Appendix 15.15.13. Appendix 15.15.14</p>	Oppose	<p>These provisions are overtly complicated, unworkable and provide inappropriate mechanisms to manage development and acquire public laneways (Appendix 15.15.12 – Sydenham and Appendix 15.15.13).</p> <p>Clarity needs to be improved in (P27) that those provisions apply to all MUZ except:</p> <ul style="list-style-type: none"> (i) Blenheim Road / Main South Road 15.10.1.4(D1); and (ii) Comprehensive Housing Precinct (15.10.1.3 (RD3) and (RD4). 	<p>Delete all existing provisions and provide a suite of workable and clear rules that encourage and enable large scale redevelopment.</p> <p>Remove statutory impediments in Appendix 15.15.12 – Sydenham and Appendix 15.15.13 requiring ‘Greenways’ and ‘Shared Pedestrian / Cycleways’ and seek to facilitate through more appropriate means – such as negotiated purchase.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Reference in 15.10.1.3(RD3) to 15.14.3.40(a)(iv) and (v) is incorrect, as these provisions do not exist.</p> <p>The respective matters identified in relation to 15.10.1.3(RD4) are overly excessive and broad.</p> <p>15.10.1.5(NC3) has the statutory function of deeming all Comprehensive Residential Development within the precinct identified for such (at Appendix 15.15.12 and 15.15.13) non-complying. This inconsistency and error needs to be corrected.</p> <p>The matters expressed in 15.14.3.40 are overly excessive and broad (effectively not restricting the matters to be assessed), lack certainty of achievement, and are absent a resource management purpose. Collectively these matters are the antithesis of the achievement of Objective 3.3.1</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>and Objective 3.3.2 and will disenable investment and redevelopment. Reference is sought to be made to a good quality living environment that positively contributes to local amenity as a high quality environment is contextually unobtainable in a transitioning Mixed Use Environment.</p> <p>The requirements in Appendix 15.15.12 – Sydenham and Appendix 15.15.13. Appendix 15.15.14 are not the most appropriate in terms of s32 of the Act, and will act to disenable redevelopment and the purpose of the Zone.</p>	
165.	Central City Zone	15.11.1.1(P18) – Small buildings	Support	Support the introduction of a permitted pathway for small buildings where the built form rules and activity standards are sufficient to deliver acceptable urban design outcomes and the need for a separate urban design assessment/ consent is able to be avoided.	Retain P18 as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
166.	Central City Zone	15.11.1.2(C1)	Oppose	<p>Additions to C1 are not in accordance with the statutory requirements of the NPS-UD, Sections 77G or 77H of the Resource Management Act, nor Objective 3.3.1 and 3.3.2 of the Plan. The provisions would act as proxies to otherwise reduce development capacity.</p> <p>The Operative Plan controlled activity status for urban design assessments is sought to be retained.</p>	Delete proposed PC14 amendments to the rule i.e. retain the Operative Plan provision.
167.	Central City Zone Central City Mixed Use Zone	Residential Activity 15.11.1.3(RD4) Matters (b) and (c) 15.12.1.3(RD)(b) and (c)	Oppose	Additional controls are unnecessary and inappropriate. These matters are able to be addressed by existing matters (i.e 15.14.2.9(b) and 15.14.2.9(d).	<p>Amend the rule by deleting clauses (b) and (c) as follows:</p> <p>a. Residential activity in the Commercial Central City Business City Centre and Central City Mixed Use Zones – Rule 15.134.2.9</p> <p>b. Glazing – 15.14.3.37</p> <p>c. Outlook spaces – 15.14.3.38.</p>
168.	Central City Zone	Buildings 15.11.1.3(RD5)	Oppose	As a consequential amendment to the relief sought in this submission to delete various	<p>Amend rule by deleting clauses (m) and (n) as follows:</p> <p>m. Upper floor setbacks, tower</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought		
				built form rules, the activity status rule also needs amending to remove reference to rule breaches with the built form rules on wind, upper floor setbacks and tower dimension.	dimension and site coverage – Rule 15.14.3.35 n. – Wind – Rule 15.14.3.39		
169.	Central City Zone	Sunlight and Outlook for the street 15.11.2.3	Oppose	Acts as a proxy to limit development capacity in the Central City in a manner that is not founded in the NPS-UD Policy 3.	Delete rule		
170.	Central City Zone	Building Height – 15.11.2.11	Support in part	<p>There is an inconsistency between the definition of Building Base and the rule. The definition of Building Base is sought to be deleted, as it is internally inconsistent with provisions in the Plan and is uncertain in purpose.</p> <p>Building Base is defined as: <i>'In respect to the City Centre and Central City Mixed Use Zones, means any part of any building that is below the maximum permitted height for that type of building in the zone.'</i></p>	<p>1. Amend definition of Building Base as:</p> <p>Building Base: In respect to the City Centre and Central City Mixed Use Zones, means any part of any building that is below the maximum permitted height for that type of building in the zone.</p> <p>2. Amend rule as follows:</p> <table border="1" data-bbox="1547 1141 2002 1198"> <tr> <td>Applicable to</td> <td>Standard</td> </tr> </table>	Applicable to	Standard
Applicable to	Standard						

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
					<table border="1"> <tr> <td data-bbox="1547 373 1794 935"> i. All buildings, except as provided for in ii, and iii and iv below. </td> <td data-bbox="1794 373 2002 935"> A. The maximum height shall be <u>90 metres</u>. B. The maximum height of the building base shall be 28 metres. in accordance with the Central City Maximum Building Height planning map </td> </tr> <tr> <td data-bbox="1547 935 1794 1158"> ii. All buildings in <u>the heritage setting of New Regent Street as identified in Appendix 9.3.7.2.</u> </td> <td data-bbox="1794 935 2002 1158"> The minimum and maximum height shall be 8 metres. </td> </tr> <tr> <td data-bbox="1547 1158 1794 1331"> iii. All buildings at the Arts Centre, being land bordered by Montreal Street, </td> <td data-bbox="1794 1158 2002 1331"> The maximum height shall be 16 metres. </td> </tr> </table>	i. All buildings, except as provided for in ii, and iii and iv below.	A. The maximum height shall be <u>90 metres</u> . B. The maximum height of the building base shall be 28 metres. in accordance with the Central City Maximum Building Height planning map	ii. All buildings in <u>the heritage setting of New Regent Street as identified in Appendix 9.3.7.2.</u>	The minimum and maximum height shall be 8 metres.	iii. All buildings at the Arts Centre, being land bordered by Montreal Street,	The maximum height shall be 16 metres.
i. All buildings, except as provided for in ii, and iii and iv below.	A. The maximum height shall be <u>90 metres</u> . B. The maximum height of the building base shall be 28 metres. in accordance with the Central City Maximum Building Height planning map										
ii. All buildings in <u>the heritage setting of New Regent Street as identified in Appendix 9.3.7.2.</u>	The minimum and maximum height shall be 8 metres.										
iii. All buildings at the Arts Centre, being land bordered by Montreal Street,	The maximum height shall be 16 metres.										

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
					<table border="1"> <tr> <td data-bbox="1547 373 1794 507">Worcester Street, Rolleston Avenue and Hereford Street.</td> <td data-bbox="1794 373 2011 507"></td> </tr> <tr> <td data-bbox="1547 507 1794 906"> iv. All buildings within the Cathedral Square Height Precinct </td> <td data-bbox="1794 507 2011 906"> A. The maximum height shall be 45 metres: B. The maximum height of the building base shall be 28 metres. </td> </tr> <tr> <td data-bbox="1547 906 1794 1321"> v. All buildings within the Victoria Street Height Precinct </td> <td data-bbox="1794 906 2011 1321"> A. The maximum height shall be 45 metres. B. The maximum height of the building base shall be 28 metres. </td> </tr> </table>	Worcester Street, Rolleston Avenue and Hereford Street.		iv. All buildings within the Cathedral Square Height Precinct	A. The maximum height shall be 45 metres: B. The maximum height of the building base shall be 28 metres.	v. All buildings within the Victoria Street Height Precinct	A. The maximum height shall be 45 metres. B. The maximum height of the building base shall be 28 metres.
Worcester Street, Rolleston Avenue and Hereford Street.											
iv. All buildings within the Cathedral Square Height Precinct	A. The maximum height shall be 45 metres: B. The maximum height of the building base shall be 28 metres.										
v. All buildings within the Victoria Street Height Precinct	A. The maximum height shall be 45 metres. B. The maximum height of the building base shall be 28 metres.										

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought		
					<table border="1"> <tr> <td data-bbox="1547 376 1789 679"> vi. <u>All buildings in the Central City Heritage Qualifying Matter and Precinct, including the following areas:</u> ... </td> <td data-bbox="1794 376 2002 679"> <u>The maximum height shall be 28 metres.</u> </td> </tr> </table>	vi. <u>All buildings in the Central City Heritage Qualifying Matter and Precinct, including the following areas:</u> ...	<u>The maximum height shall be 28 metres.</u>
vi. <u>All buildings in the Central City Heritage Qualifying Matter and Precinct, including the following areas:</u> ...	<u>The maximum height shall be 28 metres.</u>						
171.	Central City Zone	Maximum Road Wall Height - 15.11.2.12 Building Tower Setbacks - 15.11.2.14 Maximum building tower dimension and building tower coverage – 15.11.2.15 15.11.2.16 Minimum building tower separation 15.11.2.17 Wind	Oppose	<p>These provisions, both individually and collectively act as proxies to restrict height and associated development capacity in the Central City Zone.</p> <p>The retention (and addition) of height rules in the City Centre zone simply does not give effect to the NPS-UD Policy 3 direction to “enable in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification.</p>	Delete all these provisions.		

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>The proposed wind standards are inappropriate (as set between 4m/s to 6m/s more than 5% annually at ground level within 100m of a proposal.) The Technical data used in support of the provision identifies that measured wind levels already typically exceed these levels without development. There is no supporting s32 considering the benefits and costs associated with this provision.</p> <p><i>“Christchurch is a relatively windy city with a background mean wind speed of about 4 m/s (at 10 m above the ground). At the airport for example, the mean wind speed exceeds 4 m/s about 45% of the time, exceeds 6 m/s about 21% of time, and exceeds 8 m/s about 11% of the time”.¹</i></p>	
172.	Central City Mixed Use Zone	15.12.1.1(P16)(a)(iii)	Oppose	Delete as this matter is appropriately managed through	Amend rule by deleting clause (a)(iii).

¹ Technical Advice for Wind Assessments for Christchurch Cit. Meteorology Solutions (2022). [Section 2. Context]

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				screening and controls in Rule 15.12.2.5 'Screening'	
173.	Central City Mixed Use Zone	15.12.1.1(P16)(c)(iii)	Oppose	Requirement is seen as excessive within this context as these areas are not necessarily mutually exclusive.	Amend rule by deleting clause (c)(iii).
174.	Central City Mixed Use Zone	15.12.1.1(P16)(j)	Oppose	This requirement is seen as excessive within this context as a higher density of residential activity should be encouraged, with standards for outdoor and communal living space being used to provide appropriate levels of amenity.	Amend rule by deleting clause (j).
175.	Central City Mixed Use Zone	15.12.1.3(RD2) – Buildings	Oppose	Additional matters of discretion associated with Upper Floor Setbacks, and Glazing are unnecessary and not the more appropriate provisions.	Amend rule by deleting clauses (k) upper floor setbacks and (l) glazing.
176.	Central City Mixed Use Zone	15.12.1.3(RD4) – Four or more residential units	Oppose	Matters of discretion associated with Upper Floor Setbacks, and Glazing are unnecessary and not the more appropriate provisions. The matters in 15.5.1 are considered	Amend rule by deleting clauses (b) outdoor living space and (c) glazing.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				appropriately broad to ensure an appropriate balance between private, communal and public amenity.	
177.	Central City Mixed Use Zone	15.12.2.1 'Street scene, landscaping and trees'	Oppose	The proposed landscaping requirements are excessive and inappropriately reduce development opportunities. The operative plan rule is sought to be retained and PC14 amendments deleted.	Delete PC14 amendments and retain operative plan rule.
178.	Central City Mixed Use Zone	15.12.2.2	Support in part	<p>The maximum height of 32m is supported as being appropriately enabling within a proximate distance to the City Centre Zone.</p> <p>The restrictions associated with the rule are opposed as being unnecessary, in conjunction with the absence of clarity in the definition associated with 'building base' as discussed in this submission.</p>	<p>Amend the rule as follows:</p> <p>15.12.2.2 Maximum building height</p> <p>a. The maximum height of any building shall be in accordance with the height specified <u>Unless identified on the Central City Maximum Building Height planning map the maximum height of any building shall be 32 metres.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>b. The maximum height of any building base shall be 17 metres.</p> <p>b. Any application arising from this rule shall not be limited or publicly notified.</p>
179.	Central City Mixed Use Zone	15.12.2.7 – Minimum setback from the boundary	Oppose	It is considered that the inserted requirements are unnecessary, and unduly constraining.	Delete PC14 amendments and retain operative plan rule.
180.	Central City Mixed Use Zone	15.12.2.9 – Minimum number of floors	Oppose	Whilst a minimum requirement of two floor levels is appropriate in the zone to increase intensity of development, the zone provides for a wide variety of uses, not all of which are appropriate in multi-storey buildings. As such single storey buildings may well be appropriate in a mixed use environment.	Delete proposed rule.
181.	Central City Mixed Use Zone	15.12.2.10 – Building Setbacks	Oppose	Requirements associated with internal setbacks between building towers is unnecessary.	Amend the rule by deleting clauses (b) and (c).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
182.	Central City Mixed Use Zone	15.12.2.11 – Building Tower Coverage	Oppose	Considered unnecessary and would inappropriate disenable development capacity for no sound resource management purpose.	Delete the rule.
183.	Central City Mixed Use Zone	15.12.2.12 – Glazing	Oppose	Considered unnecessary and would inappropriate disenable development capacity for no sound resource management purpose	Delete the rule.
184.	Central City Mixed Use Zone (South Frame)	15.12.1.1(P13)(a)(iii)	Oppose	Delete as this matter is appropriately managed through screening and controls in Rule 15.12.2.5 'Screening'	Amend the rule by deleting clause (a)(iii).
185.	Central City Mixed Use Zone (South Frame)	15.12.1.1(P13)(d)(iii)	Oppose	Requirement is seen as excessive within this context as these areas are not necessarily mutually exclusive.	Amend the rule by deleting clause (d)(iii).
	Central City Mixed Use Zone (South Frame)	15.12.1.1(P13)(f)(g)(j)	Oppose	Increasing the extent of setbacks is not more appropriate within this context, revert to the operative Plan rule.	<ol style="list-style-type: none"> 1. Amend the rule by retaining the operative Plan wording for clause (f). 2. Delete clauses (g) and (j).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Clause (j) is seen as excessive within this context as a higher density of residential activity should be encouraged, with standards for outdoor and communal living space being used.	
186.	Central City Mixed Use Zone – South Frame	15.13.1.3(RD4)	Oppose	Assessment matters for Glazing and Outdoor Space are excessive and appropriate matters are contained within Provision 15.14.2.10.	Amend the rule by deleting clauses (b) - glazing and (c) – outlook.
187.	Central City Mixed Use Zone – South Frame	15.13.1.3(RD5)	Oppose	Assessment matters for Upper floor setbacks and glazing are excessive.	Amend the rule by deleting clauses (l) – upper floor setbacks and (m) – glazing.
188.	Central City Mixed Use Zone – South Frame	15.13.2.1	Support in part	<p>The maximum height of 32m is supported as being appropriately enabling within a proximate distance to the City Centre Zone.</p> <p>The restrictions associated with is opposed as unnecessary, in conjunction with the absence of clarity in the definition associated with ‘building base’</p>	<p>Delete the rule and replace as follows:</p> <p><u>The maximum height of all buildings shall be 32m.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>as discussed in this submission.</p> <p>The provision as associated with notification is sought to be consistent with that associated with the Central City – Mixed Use zone.</p>	Retain clause (b).
189.	Central City Mixed Use Zone – South Frame	15.13.2.4(f) 'Street scene, landscaping and trees'	Oppose	The requirement for a minimum area of tree canopy of 4m ² is excessive and inappropriately, it reduces development opportunities.	Amend the rule by deleting the PC14 amendments and retaining the Operative Plan rule wording.
190.	Central City Mixed Use Zone – South Frame	15.13.2.10 – Building Tower Setbacks 15.13.2.11 – Building Tower Coverage 15.13.2.12 – Glazing	Oppose	Considered unnecessary and would reduce development capacity for no sound resource management purpose.	Delete rules 15.13.2.10 – tower setbacks, 15.13.2.11 – tower coverage, and 15.13.2.12 -glazing.
191.	Assessment Matters	15.14.3.1	Oppose	Additional assessment matters set out in clause (b) are unnecessary as the key issues are already addressed in clause (a), or are matters to be deleted	Delete clause (b), with the exception of clause (v) (subject to the below amendment): v. <u>The individual or cumulative</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				as a consequential amendment in association with the submission seeking the deletion of street wall, wind, and tower rules.	<u>effects of shading, visual bulk and dominance, and reflected heat from glass</u> on sites in adjoining residential zones or on the character, quality and use of public open space and in particular the <u>Ōtākaro Avon River corridor, Earthquake Memorial, Victoria Square and Cathedral Square</u> .
192.	Assessment Matters	15.14.3.35 – Upper Floor Setbacks 15.14.3.36 – height in Central City Mixed Use Zone 15.14.3.37 Glazing 15.14.3.38 Outdoor Spaces 15.14.3.39 Wind 15.14.3.40 – Comprehensive Residential Development in the Mixed Use Zones 15.14.5.3 City Spine Transport Corridor	Oppose	Additional controls are unnecessary, subjective and overly broad. These matters are all addressed by Rule 15.14.2.6 'Urban Design'. Deletion of the assessment matters sought as a consequential amendment associated with the submission seeking the deletion of the upper floor setback rule.	Delete the following assessment matters: 15.14.3.35 – upper floor setbacks 15.14.3.36 – height in Central City Mixed Use Zone 15.14.3.37 Glazing 15.14.3.38 Outdoor Spaces 15.14.3.39 Wind 15.14.3.40 – Comprehensive Residential Development in the Mixed Use Zones 15.14.5.3 City Spine Transport Corridor

Appendix 2: Metropolitan Centre Zone Rules

The following Metropolitan Centre Zone Rules set out proposed amendments sought from Kāinga Ora to Plan Change 14, to incorporate rules to enable the classification of Hornby, Papanui and Riccarton as Metropolitan Centre Zones

Proposed changes in zoning are highlighted in dark blue.

MCZ - Metropolitan Centre Zone

The Christchurch Metropolitan Centres are commercial centres with a focal point as sub-regional centres of Papanui, Riccarton and Hornby. They have a planned urban built environment that reflects a high density built form with high-quality public spaces. The Metropolitan Centre Zone provides for a diverse range of commercial, retail, community and recreational activities and offers a variety of employment and living opportunities.

The Metropolitan Centre Zone implements the National Policy Statement on Urban Development, by enabling a built form and density that reflects demand for housing and business use in sub-regional centres.

Activities and buildings along identified active street frontages interact with the streets and public spaces and contribute to a vibrant and attractive metropolitan centre. New buildings and development are well designed and reflect the high-quality urban environment.

Objectives
<p>MCZ-O1 Purpose of the Metropolitan Centre Zone</p> <p>The Metropolitan Centre Zone:</p> <ol style="list-style-type: none"> 1. Is Christchurch's secondary commercial, civic and community centres; and 2. Accommodates a wide range of commercial, community, recreational and residential activities.
<p>MCZ-O2 Planned urban built environment of the Metropolitan Centre Zone</p> <p>The planned urban built environment of the Metropolitan Centre Zone is characterised by:</p> <ol style="list-style-type: none"> 1. A built form that is compact and reflects the high-density environment of the Metropolitan Centre; 2. A built environment that is versatile, well designed and of high quality and contributes to attractive and safe public spaces; and 3. An urban environment that is an attractive place to live, work and visit.
Policies
<p>MCZ-P1 Appropriate activities</p> <p>Enable activities that are compatible with the purpose of the Metropolitan Centre Zone.</p>
<p>MCZ-P2 Location of residential activity</p> <p>Enable residential activity where:</p> <ol style="list-style-type: none"> 1. It is located above ground floor; and 2. It provides for an ongoing active street frontage with a positive interface with the public space.
<p>MCZ-P3 Health and well-being for residential activity</p> <p>Ensure residential activity and residential units achieve a healthy urban built environment that provides for people's amenity and well-being in respect of:</p> <ol style="list-style-type: none"> 1. Access to sunlight, daylight and outdoor living space; and 2. Privacy and site design.

<p>MCZ-P4 Other activities</p> <p>Provide for other activities within the Metropolitan Centre Zone where:</p> <ol style="list-style-type: none"> 1. Any significant adverse effects, can be avoided, remedied or mitigated; and 2. The activity is consistent with the planned urban built environment and purpose of the zone.
<p>MCZ-P5 Inappropriate activities</p> <p>Avoid activities that are incompatible with the purpose of the Metropolitan Centre Zone.</p>
<p>MCZ-P6 Small scale built development</p> <p>Enable repairs, alterations and additions to existing buildings and structures, and the erection of smaller-scale buildings and structures, that achieve the planned urban built environment for the Metropolitan Centre Zone.</p>
<p>MCZ-P7 Larger scale built development</p> <p>Provide for high-density development that achieves a quality built form, taking into consideration the following design objectives and the planned urban built environment of the zone.</p> <ol style="list-style-type: none"> 1. Buildings are well-designed and contribute to a high-quality vibrant public realm through visual interest and aesthetic coherence achieved through façade design, materials, and active edges; 2. Buildings abut the street edge and define and enclose the streets, and define the edges of open space; 3. Street corners are legible and enhanced through architectural treatment and form and maximised activity; 4. Pedestrian amenity is maximised through good permeability and activation, which contributes to safety and walkability; 5. Servicing and parking are subservient to the built form to maximise an attractive and active pedestrian interface at the street edge; 6. Servicing plant is integrated within the architectural design, to avoid an ‘add on’ appearance and ensure a well-designed top to buildings; 7. Residential activity is provided with a high quality living environment, including access to privacy, outlook, and sun access; 8. Development responds to the positive contextual elements (existing and potential) including neighbouring buildings, elements such as trees and crossing points in the street
<p>MCZ-P8 Public space interface</p> <p>Where located along an active street frontage identified on the planning maps, require development to provide a positive interface with the public space through:</p> <ol style="list-style-type: none"> 1. Buildings that are built up to the front boundary of the site; 2. Continuous active street frontages; 3. Verandas or other forms of pedestrian shelter; 4. Transparent glazing on the ground floor that allows visibility into and out of commercial frontages and reflects whether it is a primary or secondary frontage; 5. Obvious and highlighted public entrances; and 6. Visually unobtrusive parking, storage and servicing areas, preferably within or to the rear of the building.
<p>MCZ-P9 Car parking and parking lots</p> <p>Only allow for ground level car parking and parking lots where:</p> <ol style="list-style-type: none"> 1. It is not located along a primary frontage identified on the planning maps; and

2. Any adverse effects on the amenity and quality of the streetscape and public open spaces can be minimised.

Rules

MCZ-R1 New buildings and structures, and alterations, repairs and additions to existing buildings and structures

1. Activity status: **Permitted**

Where:

- a. The gross floor area of the new building, structure or addition to an existing building or structure is no more than 450m²; and
- b. Compliance is achieved with:
 - i. MCZ-S1;
 - ii. MCZ-S2;
 - iii. MCZ-S4; and
 - iv. MCZ-S5.

Except that:

MCZ-S1, MCZ-S4 and MCZ-S5 do not apply to alterations and repairs to existing buildings and structures.

2. Activity status: **Restricted discretionary**

Where:

- a. Compliance is not achieved with MCZ-R1-1.a.

Matters of discretion are restricted to:

1. The matters in MCZ-P7.

Notification:

An application under this rule is precluded from being publicly and limited notified in accordance with sections 95A and 95B of the RMA.

3. Activity status: **Restricted discretionary**

Where:

- a. Compliance is not achieved with MCZ-R1-1.b.

Matters of discretion are restricted to:

1. The matters of discretion of the infringed standard.

Notification:

An application under this rule where compliance is not achieved with MCZ-S2, MCZ-S3, MCZ-S4, or MCZ-S5 is precluded from being publicly

	notified in accordance with section 95A of the RMA.
MCZ-R2	Construction activity 1. Activity status: Permitted
MCZ-R3	Retail activity 1. Activity status: Permitted
MCZ-R4	Commercial service activity 1. Activity status: Permitted
MCZ-R5	Office 1. Activity status: Permitted
MCZ-R6	Entertainment activity 1. Activity status: Permitted
MCZ-R7	Recreation activity 1. Activity status: Permitted
MCZ-R8	Gymnasium 1. Activity status: Permitted
MCZ-R9	Food and beverage outlet 1. Activity status: Permitted
MCZ-R10	Healthcare activity 1. Activity status: Permitted
MCZ-R11	Educational facility 1. Activity status: Permitted
MCZ-R12	Community facility 1. Activity status: Permitted
MCZ-R13	Visitor accommodation 1. Activity status: Permitted
MCZ-R14	Residential activity including Papakāinga/Kāinga Nohoanga 1. Activity status: Permitted Where: a. Compliance is achieved with: i. MCZ-S3.
	2. Activity status: Restricted discretionary

<p>Where:</p> <p>a. Compliance is not achieved with MCZ-S3.</p> <p>Matters of discretion are restricted to</p> <p>1. The matters of discretion of the infringed standard.</p> <p>Notification:</p> <p>An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</p>
<p>MCZ-R15 Social Housing Complex</p> <p>1. Activity status: Permitted</p>
<p>MCZ-R16 Community corrections activities</p> <p>1. Activity status: Permitted</p>
<p>MCZ-R17 Conservation activity</p> <p>1. Activity status: Permitted</p>
<p>MCZ-R18 Customary harvesting</p> <p>1. Activity status: Permitted</p>
<p>MCZ-R19 Large format retail activity</p> <p>1. Activity status: Permitted</p>
<p>MCZ-R20 Supermarket</p> <p>1. Activity status: Permitted</p>
<p>MCZ-R21 Emergency service facility</p> <p>1. Activity status: Restricted discretionary</p> <p>Matters of discretion are restricted to:</p> <p>1. The matters in MCZ-P4.</p> <p>Notification:</p> <p>An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</p>
<p>MCZ-R22 Retirement village</p> <p>1. Activity status: Restricted discretionary</p> <p>Matters of discretion are restricted to:</p> <p>1. The matters in MCZ-P4.</p>
<p>MCZ-R23 Parking lot</p> <p>1. Activity status: Restricted discretionary</p>

	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> The matters in MCZ-P9. <p>Notification: An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA</p>
	<p>MCZ-R24 Trade supplier</p> <ol style="list-style-type: none"> Activity status: Discretionary
	<p>MCZ-R25 Drive-through services</p> <ol style="list-style-type: none"> Activity status: Permitted
	<p>MCZ-R26 Any activity not otherwise listed as permitted, restricted discretionary, discretionary or non-complying</p> <ol style="list-style-type: none"> Activity status: Discretionary
	<p>MCZ-R27 Industrial activity</p> <ol style="list-style-type: none"> Activity status: Non-complying
	<p>MCZ-R28 Primary production</p> <ol style="list-style-type: none"> Activity status: Non-complying
	<p>MCZ-R29 Rural activities other than primary production</p> <ol style="list-style-type: none"> Activity status: Non-complying

Standards	
MCZ-S1 Height	
<ol style="list-style-type: none"> All buildings and structures must not exceed a maximum height above ground level of 53m. 	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> The location, design and appearance of the building or structure; Loss of sunlight to adjacent public space; Shading to surrounding buildings; Shading and loss of privacy for any adjacent residential activity; Wind effects on the safety and amenity of the adjacent public space; The planned urban built environment; and Whether an increase in building height results from a response to natural hazard mitigation.
MCZ-S2 Active street frontages	
<ol style="list-style-type: none"> Along building lines identified on the planning maps all buildings must be built up to and oriented towards the identified building line and provide a veranda that: 	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> Whether the building promotes a positive interface with the street, community safety and visual interest; Whether the building incorporates landscaping or other means to provide

<ul style="list-style-type: none"> a. Extends along the entire length of the building frontage; b. Provides continuous shelter with any adjoining veranda; and c. Has a minimum setback of 500mm from any kerb face. <p>2. For sites with primary street frontage controls identified in the planning maps:</p> <ul style="list-style-type: none"> a. At least 55% of the ground floor building frontage must be display windows or transparent glazing; and b. The principal public entrance to the building must be located on the front boundary. <p>3. For sites with secondary street frontage controls identified in the planning maps at least 35% of the ground floor building frontage must be display windows or transparent glazing.</p>	<p>increased amenity, shade and weather protection; and</p> <p>3. Whether topographical or other site constraints make compliance with the standard impractical.</p>
<p>MCZ-S3 Location of residential units</p>	
<p>1. All residential units must be located above ground floor.</p>	<p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> 1. The amenity and quality of the streetscape; 2. Whether the location of the residential units promote on the an active frontage, community safety and visual interest at the pedestrian level; and 3. Whether the design could facilitate conversion to commercial use so as not to foreclose future options.
<p>MCZ-S4 Location of parking</p>	
<p>1. Any on-site ground level car parking must be located within or at the rear of the building that it serves.</p>	<p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> 1. The amenity and quality of the streetscape.

MCZ-S5 Service areas and outdoor storage	
<p>1. Any on-site service area, including rubbish collection areas, and area for the outdoor storage of goods or materials must:</p> <ul style="list-style-type: none"> a. Be located to the rear of the building; and b. Without preventing the provision of a gate or entry point to the site, be fully screened by a 1.8m high fence or landscaping where it is visible from the road or any other public space. 	<p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> 1. The amenity and quality of the streetscape or public space; and 2. The service and storage needs of the activity.

Appendix 3: Maps

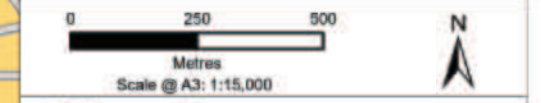
The following maps set out the height amendments sought from Kāinga Ora to Plan Change 14.

Noting that changes to the Residential Suburban and Residential Transition Zone and including the Lyttleton Port Residential Zone has not been shown here.

Christchurch City Council Plan Change 14 Kāinga Ora Submission Papanui & Merivale

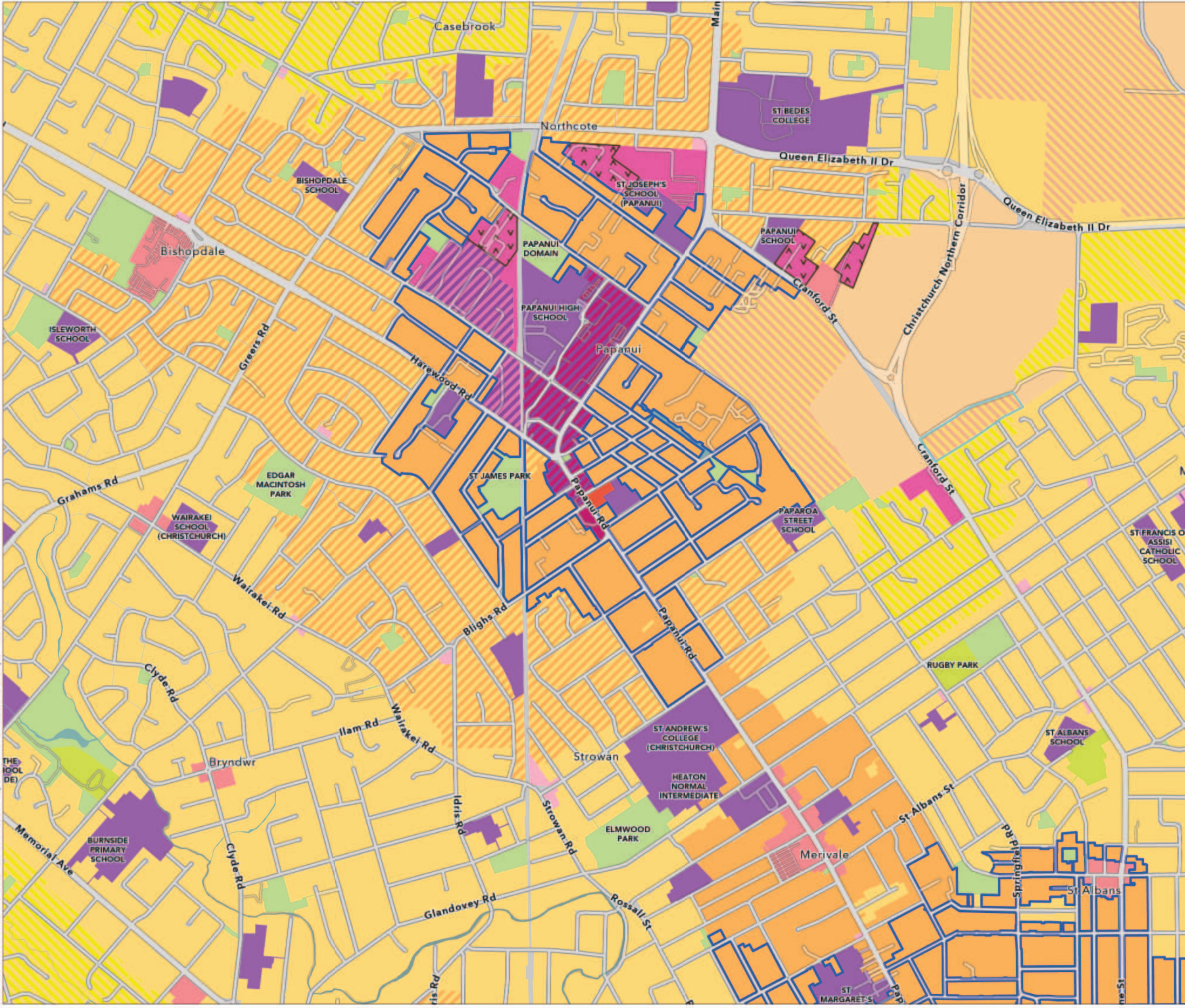
- Kāinga Ora Proposed HVC**
 [Blue outline] Height Variation Control - 36m
- Kāinga Ora Proposed Zoning**
 [Purple hatched] Metropolitan Centre Zone
 [Orange hatched] High density residential zone
 [Yellow hatched] Medium density residential zone
- PC14 Zoning**
 [Light orange] Future Urban Zone
 [Orange] High density residential zone
 [Pink] Large format retail zone
 [Light pink] Local centre zone
 [Yellow] Medium density residential zone
 [Light purple] Neighbourhood centre zone
 [Dark purple] Town centre zone
 [Grey] Transport
 [Dark purple] Specific Purpose
 [Pink] Industrial General
 [Light orange] Rural Urban Fringe
 [Red] Residential Guest Accommodation
 [Light yellow] Residential Medium Density
 [Yellow] Residential Suburban
 [Orange] Residential Suburban Density Transition
 [Light green] Open Space Community Parks
 [Green] Open Space Metropolitan Facilities
 [Dark green] Open Space Natural
 [Blue-green] Open Space Water and Margins
 [Light yellow] Residential New Neighbourhood
- Precinct**
 [Black outline] Brownfield Precinct

This map contains data derived in part or wholly from sources other than Kāinga Ora, and therefore, no representations or warranties are made by Kāinga Ora as to the accuracy or completeness of this information. Contains information sourced from Hastings District Council, Hawke Bay Regional Council, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS. Map intended for distribution as an A3 PDF document.



Revision	1.0
Status	FINAL
Author	JH
Verifier	LB
Date	12/05/2023

Project	Christchurch City Council PC14 Submissions
Client	Kāinga Ora
Discipline	GIS
Drawing No.	GIS-7774461-CCPC14-01



Path: P:\7774461-11-WIP\WG-GIS\ChristchurchNPSUD\01-Map\GIS-7774461-ChristchurchNPSUD.aprx Author: JH

Christchurch City Council Plan Change 14 Kāinga Ora Submission Hornby

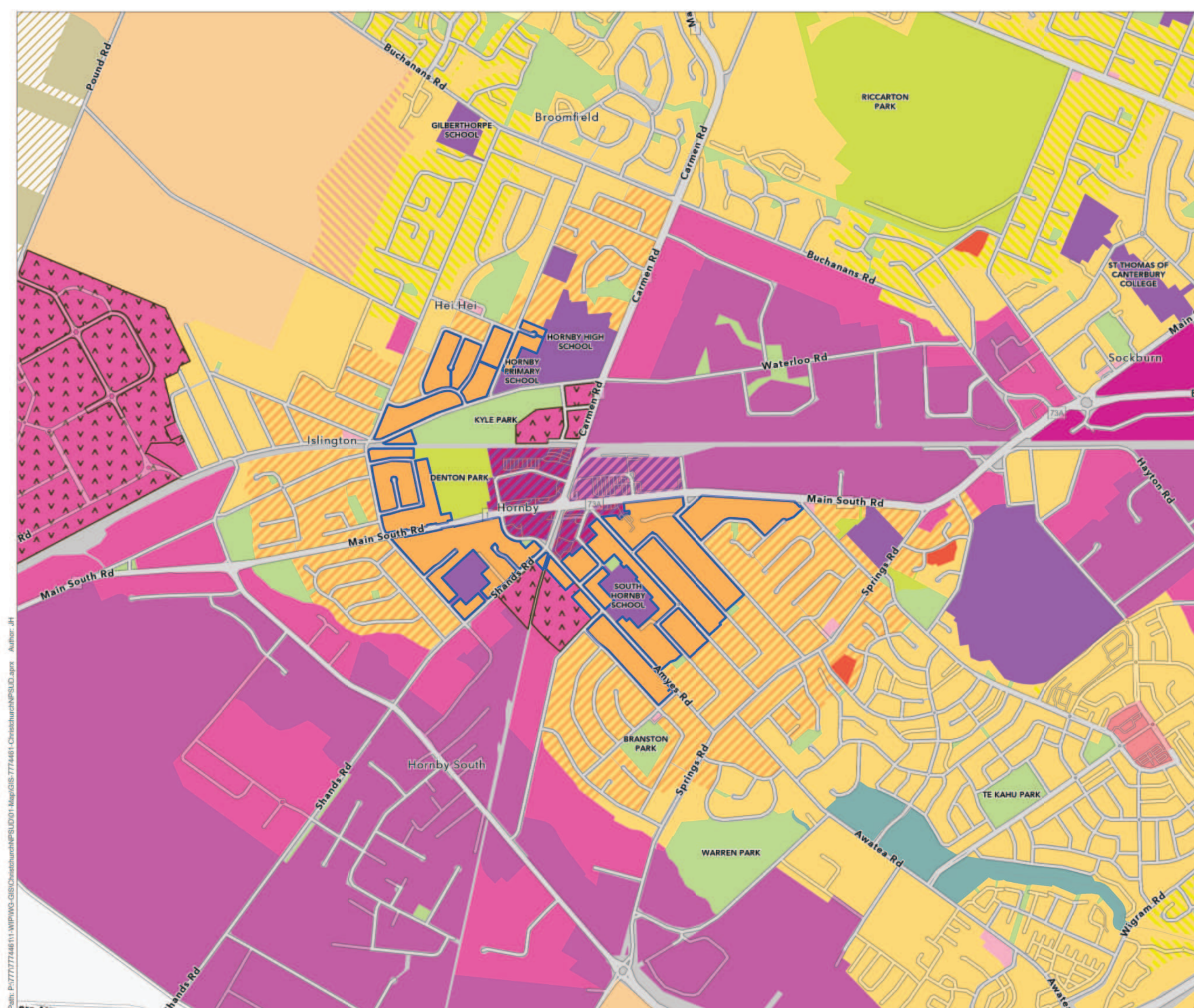
- Kāinga Ora Proposed HVC**
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- PC14 Zoning**
 [Light orange] Future Urban Zone
 [Orange] High density residential zone
 [Pink] Large format retail zone
 [Light pink] Local centre zone
 [Yellow] Medium density residential zone
 [Magenta] Mixed use zone
 [Light magenta] Neighbourhood centre zone
 [Dark magenta] Town centre zone
 [Grey] Transport
 [Dark purple] Specific Purpose
 [Light purple] Industrial General
 [Dark purple] Industrial Heavy
 [Purple] Industrial Park
 [Light green] Rural Quarry
 [Light green with hatched] Rural Quarry or Open Space Community Parks (Templeton)
 [Light orange] Rural Urban Fringe
 [Red] Residential Guest Accommodation
 [Yellow] Residential Suburban
 [Orange] Residential Suburban Density Transition
 [Light green] Open Space Community Parks
 [Light green] Open Space Metropolitan Facilities
 [Teal] Open Space Water and Margins
 [Light yellow] Residential New Neighbourhood
- Precinct**
 [Black outline] Brownfield Precinct

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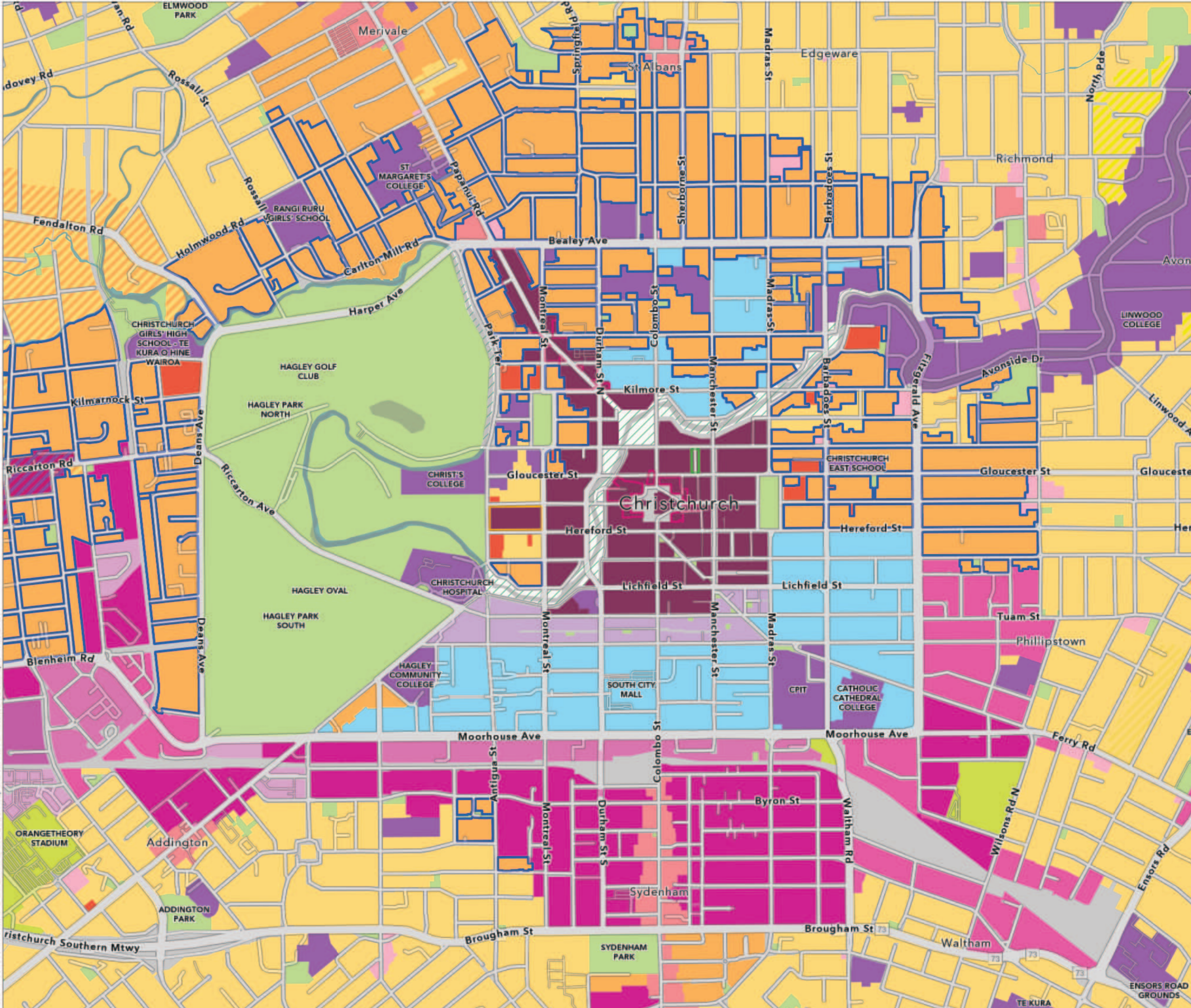
Project	Christchurch City Council PC14 Submissions
Client	Kāinga Ora
Discipline	GIS
Drawing No.	GIS-7774461-CCPC14-04



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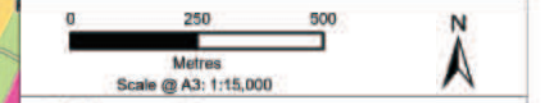
Christchurch City Council
Plan Change 14
Kāinga Ora Submission
 City Centre

834



- Kāinga Ora Proposed HVC**
- Height Variation Control - 36m
- Kāinga Ora Proposed Zoning**
- Metropolitan Centre Zone
 - High density residential zone
 - Medium density residential zone
- PC14 Zoning**
- Central City Mixed Use Zone
 - Central City Mixed Use Zone (South Frame)
 - City centre zone
 - High density residential zone
 - Large format retail zone
 - Local centre zone
 - Medium density residential zone
 - Mixed use zone
 - Neighbourhood centre zone
 - Town centre zone
 - Transport
 - Specific Purpose
 - Industrial General
 - Industrial Heavy
 - Residential Guest Accommodation
 - Residential Medium Density
 - Residential Suburban
 - Residential Suburban Density Transition
 - Open Space Community Parks
 - Open Space Metropolitan Facilities
 - Open Space Water and Margins
 - Commercial Office
 - Avon River Precinct (Te Papa Otakaro)
 - Commercial Retail Park
- Precinct**
- Art Centre Height Precinct
 - Cathedral Square and Victoria Street Precinct
 - New Regent Street Height Precinct

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Date	12/05/2023

Project	Christchurch City Council PC14 Submissions
Client	Kāinga Ora
Discipline	GIS
Drawing No.	GIS-7774461-CCPC14-02



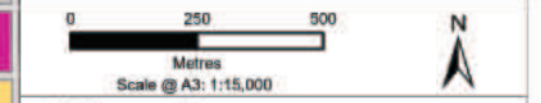
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Christchurch City Council
Plan Change 14
Kāinga Ora Submission
 Riccarton

834

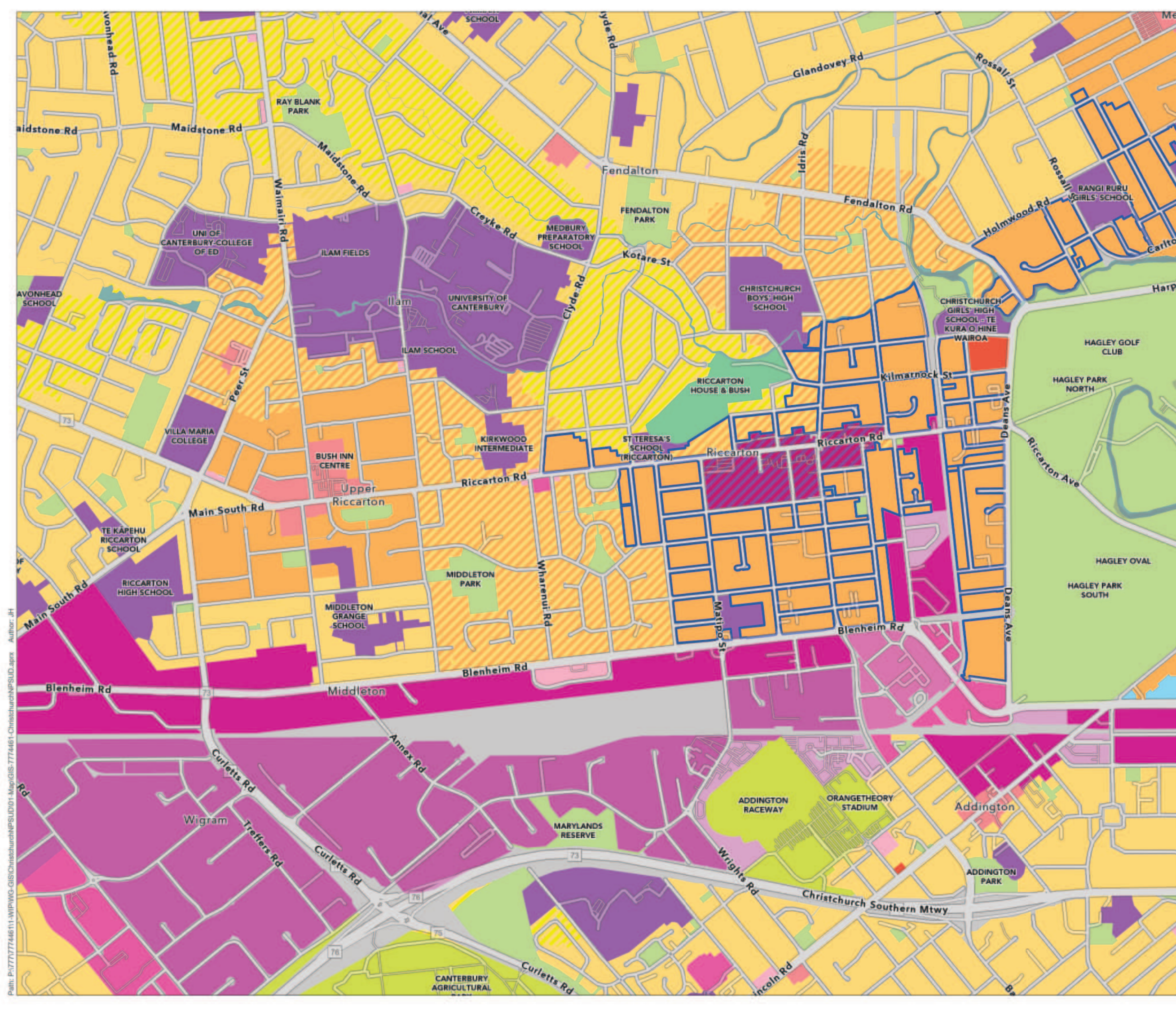
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 [Blue outline] Height Variation Control - 36m
- Kāinga Ora Proposed Zoning**
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 - [Yellow] Medium density residential zone
- PC14 Zoning**
- [Light Blue] Central City Mixed Use Zone
 - [Orange] High density residential zone
 - [Pink] Large format retail zone
 - [Red] Local centre zone
 - [Yellow] Medium density residential zone
 - [Magenta] Mixed use zone
 - [Light Pink] Neighbourhood centre zone
 - [Dark Red] Town centre zone
 - [Grey] Transport
 - [Dark Purple] Specific Purpose
 - [Pink] Industrial General
 - [Purple] Industrial Heavy
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 - [Yellow] Residential Medium Density
 - [Light Yellow] Residential Suburban
 - [Orange] Residential Suburban Density Transition
 - [Light Green] Open Space Community Parks
 - [Green] Open Space Metropolitan Facilities
 - [Dark Green] Open Space Natural
 - [Teal] Open Space Water and Margins
 - [Light Purple] Commercial Office

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Discipline	GIS
Drawing No.	GIS-7774461-CCPC14-01



Path: P:\7774461-11-WIP\WG-GIS\ChristchurchNPSUD\01-Map\GIS-7774461-ChristchurchNPSUD.aprx Author: JH

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Lynne **Last name:** Lochhead

Organisation: Historic Places Canterbury

On behalf of:

Preferred method of contact Email

Postal address: 123 Huntsbury Avenue

Suburb:

City:

Country: New Zealand

Postcode: 8022

Email: lynnelochhead@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.

Attached Documents

File

Submission on Plan changes 13 14



Submission District Plan Changes: Plan Change 13 Heritage & Plan Change 14 Housing and Business Choice

Historic Places Canterbury (HPC), an independent regional society affiliated to Historic Places Aotearoa (HPA). Our objectives are the protection of heritage, providing local advocacy on heritage and promoting the education of the public in their appreciation of heritage values.

Plan Change 14

HPC accepts that it is desirable to contain urban growth by promoting intensification in order to keep our cities from encroaching further on versatile soils needed for the production of food and to ameliorate impacts on global warming by avoiding costly and inefficient extension of infrastructure by maximising the utility of existing infrastructure. We recognise that the Council is required to accept government direction around intensification. While addressing this issue is necessary, we believe that the approach conceived by central government, which gives a virtually blanket right to build multi-story dwellings on any existing titles, is clumsy. It disregards the many likely adverse consequences which will follow from ignoring principles of good planning and urban design and the benefits of local knowledge. HPC recognises that Plan Change 14 does its best to work within the constraints that have been imposed upon the Council by central directive. We are broadly supportive of the proposed changes. Points we strongly wish to support and any concerns which we have are outlined below.

Qualifying Matters

We strongly support all the proposed Qualifying Matters, but in particular those matters listed under Matters of National Importance (RMAs.6), including historic heritage; Public Open Space Areas; Residential Heritage Areas and Residential Character Areas; Sunlight Access; Riccarton Bush Interface; and the Otakaro Avon River Corridor. Although our concerns as a group relate primarily to heritage, we consider that many of the other qualifying matters such as the Tsunami Management Areas and Vacuum Sewer Wastewater Constraint and Low Public Transport Accessibility Areas are sensible qualifying matters which will help to protect quite large areas of the city from the random high density developments that will have adverse consequences in the longer term, and from our perspective, will also help to maintain their existing character.

Sunlight access

We fully support making sunlight access a qualifying matter so that recession planes can be adjusted to allow Christchurch developments under the MDRS to have the same amount of sunlight access as Auckland developments. Furthermore, we would argue that a similar amount of sunlight access to Auckland represents a bare minimum of what is acceptable because, with the lower temperatures experienced in Christchurch over winter, maximising sun access is a desirable objective not only to mitigate the need for greater energy use associated with heating but also to enhance health and well-being. In our view, no ground-floor sun for over 3 months of the year

seems a totally unsatisfactory standard, whether in Christchurch or Auckland.

Recession planes set at the level dictated by MDRS would result in overshadowing of existing buildings, making them less desirable and precipitating their replacement. This may be viewed by some as a positive, helping to speed up the pace of intensification, however it is worth recalling that demolition and construction are our second largest contributor to carbon outputs and account for approximately 40% of hard-fill waste. Adaptation of the existing housing stock, together with more sympathetic infill may ultimately be a better outcome for both people and the environment than the rather heedless rush to demolish and build multi-dwelling structures which the MDRS promotes. We would do well to heed the lessons to be learned from mistakes which other countries made in trying to meet post-war housing shortages by failing to take sufficient account of the importance of livability and amenity. It is a well documented fact that the most successful post-war housing programmes resulted from close consultation and collaboration with the communities that were being housed.

Tree Cover

Loss of tree canopy has been one of the notable features of intensification within the city to date and increased intensification can only lead to further loss despite the measures being proposed in mitigation. We support the plan's recognition of the importance of trees in mitigating the effects of global warming and providing other environmental benefits. We welcome the inclusion of scheduled trees as a qualifying matter and we believe that work to add to the scheduled list must be a high priority, given the ongoing loss of trees from the city. We also support updating of setbacks to better protect individual trees.

We support all efforts to incentivise tree planting, including the canopy cover requirements relating to development and subdivision consents. We also support the proposal to require financial contributions to allow mitigating planting on council owned land where the required tree-canopy cover, through either retention of existing trees or new planting, has not been met. However, while additional planting on Council-owned land is highly desirable, that can never fully compensate for the loss of tree cover and consequent loss of amenity in the areas affected by intensification. Even where sufficient trees are planted to meet the canopy rules, it will be years before a young tree can provide the environmental benefits and the amenity for people that mature trees provide. In fact, HPC has some concerns that the financial contribution provision may prove to be a bit of a double edged sword. It would be unfortunate if a well-meaning provision was used to provide an easy out for developers to pay up rather than seek to protect existing trees through clever design. Removal of mature trees needs to be seen as a last resort. There is a need for the Council to work much more closely with developers to overcome the clean-slate mindset which seems to prevail at present and the financial contribution need to be set at a level sufficient to discourage this clean-slate approach.

Even where mature trees are retained, it is vital to ensure that this will not just be for long enough to obtain the desired resource consent, only to have the trees die or require removal a few years down the track. All too often around the city large trees are seen to be dying back because they have suffered unsustainable root damage during construction nearby. While the rules make provision for providing sufficient soil volume and tree root dimensions for the tree's requirements and provide for maintenance of the trees or removal and replacement of any that are damaged, it is not clear how this will, in practice, be monitored.

Height

We acknowledge that it is sensible and appropriate to concentrate the highest density in the central city with further centres of both residential and commercial density concentrating around the

biggest outlying commercial hubs which are well served by public transport, gradually reducing to neighbourhood hubs. However, we have real concerns about the extent of the 90 metre central city zone. We note below that it adjoins 11 metre zones in some places and 32 metre zones in many places. We believe there is a need for a more graduated height around the boundaries of the 90 metre zone.

We strongly support the lower heights proposed adjacent to New Regent Street, The Arts Centre and Cathedral Square. However we are concerned that Hagley Park has not been given similar protection despite the fact that the Hagley Park Management Plan 2007 states as an objective, the investigation of a conservation buffer zone around the park to protect the integrity of its visual landscape. Tall buildings on land adjacent to the perimeter are recognised as a threat to the character of Hagley Park. It is disappointing that this has not been taken into account in setting the height limits around the park which, at 32 meters along Park Terrace, greatly exceed the previous limit of 14 metres. HPC believes that lower heights also need to be implemented adjacent to Cranmer and Latimer Squares, both of which are also scheduled heritage items. The proposed heights would allow 90 metres to the west of Latimer Square and 32 metres around Cranmer Square and to the east of Latimer Square. The 90 metre height limit is particularly concerning, though in reality it is probably unlikely to have any impact in the short term given the number of new buildings around the Square. We note that a Riccarton Bush Interface Area has been defined as a qualifying matter to protect the heritage landscape of Riccarton Bush, which we fully support. We acknowledge that this is a slightly different case as the interface area is vital to protect views to the bush from surrounding streets. Creating a Qualifying Interface Area may be a more flexible means of providing a buffer for the heritage areas of Hagley Park, Cranmer Square and Latimer Square than adjusting the height limits around them. We believe that it is important that some mechanism be put in place to protect their heritage values, their open space landscape values and the views outwards from within those spaces.

Plan Change 13

HPC supports the proposed simplification and clarification of the rules for heritage to help make them more workable, effective and easily understood. We also fully support the proposed addition of sites and interiors to the heritage schedule, including the upgrading of some listings. We are pleased to note that some of our recommended additional listings have now been included in the proposed change. We note that others are under investigation but have not been included because of time constraints in completing the necessary investigations. We acknowledge that thorough investigation is essential and support the continuation of this work. We hope, in due course, to see listing of the Barnett Avenue Pensioner Cottages, the Upper Riccarton War Memorial Library, The Princess Margaret Hospital and the former High Court, for all of which we have previously submitted supporting information.

We commend the commitment of the Council to providing interior protection for scheduled buildings and recognise that this is an ongoing process. It is pleasing that 26 interiors are proposed to be added to the schedule in this plan change

Paragraph 3.3.15 of the s. 32 Report states that the owners of Daresbury (Highly Significant) and 32 Armagh St (Significant) wish to have their buildings removed from the Heritage Schedule. HPC is strongly opposed to this. Daresbury is a major building in the English Domestic Revival style by Samuel Hurst Seagar, one of Christchurch's most significant architects. Not only is it one of Seagar's finest buildings, it has important cultural associations including as the residence of the Governor General from 1940-50. A number of significant large scale domestic buildings by Seagar were lost in the earthquakes, making it all the more important that Daresbury should continue to be listed. Daresbury, it should be noted, is a category 1 item on the Heritage New Zealand list.

Though 32 Armagh is only scheduled as Significant we believe it is important that this building should also be retained on the list, especially as it forms part of the Inner City West Residential Heritage Area. It is

indicative of the mixed range of dwelling in the area. It is a survivor of a more modest style of house from an earlier period before the area became dominated by larger two storey gentleman's residences dating from the end of the 19th century through to the early 20th century. It forms a clear contrast in scale and architectural pretension to the much grander, architecturally designed "Orari" on the opposite side of Gloucester Street.

Residential Heritage Areas

We welcome the addition of 11 Residential Heritage areas and their inclusion as Qualifying Matters. We note that where a High Density Residential Zone or a Residential Visitor Accommodation Zone adjoins a Residential Heritage Area, provision has been made to assess the impact of a proposed building's location, design, scale and form on heritage values or whether it would visually dominate or reduce the visibility of the site from a road or other public space.

(9.3.6.6) It is unclear to us from the wording whether the emphasis is on the fact of a site sharing a boundary or the zone sharing the boundary. It appears from the s. 32 report that it refers to a site sharing a boundary and that sites separated by a road are not captured by this rule because such sites "will generally have reduced dominance effects due to their separation distance". We consider that this assumption is questionable. The potential for visual dominance will be affected both by the width of the the carriageway and also by the relationship between relative heights of adjoining zones. Furthermore, if High Density Residential sites are considered to have the potential for causing significant visual dominance effects, then this must hold even more true between a Residential Heritage Area and the Central City Zone with an allowable height of 90m. This zone adjoins part of the the Inner City West Residential Heritage area and though they do not "share a boundary" at any point because the two zones are separated by Montreal Street, there can be little doubt that the width of the street would not give sufficient separation to avoid visual domination of a 90m building over an 11m building. In our opinion, these rules need refinement.

Residential Character Areas

HPC welcomes the addition of three new character areas and while we regret the removal of two character areas in Sumner and the reduction in size of 7 of the existing character areas, we recognise that these no longer meet the criteria and should therefore be removed or require boundary adjustments. We welcome the inclusion of Residential Character Areas as a Qualifying matter and the introduction of restricted discretionary status to help better manage and protect character areas. We also support more restrictive subdivision for character areas.

Rules relating to demolition of scheduled heritage items

HPC is concerned that the rules around consent to demolish contain no acknowledgement of the waste generated through demolition, or the carbon retention benefits of embodied energy within buildings. While the rules provide for consideration to be paid to the costs of retention for the landowner, there is no recognition that the carbon costs or benefits should also form part of the decision making process, despite the Council's stated commitment to achieving carbon neutrality by 2045. It is our contention that the carbon impact of granting a demolition consent needs to be factored into the decision making process and that the rules should be amended accordingly. Owners should also be required to provide information on the cost of demolition to allow a fairer assessment of the cost to them of retaining a listed building.

Arguably all new developments should be required to undertake a 'whole of life' energy consumption and carbon emission audit.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 16/05/2023

First name: Andrew **Last name:** James Kerr

On behalf of:

Preferred method of contact: Postal

Postal address: 57 Watford Street

Suburb: Strowan

City: Christchurch

Country: New Zealand

Postcode: 8052

Daytime Phone: 0274426803

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
Andrew James Kerr

Have your say

Housing and Business Choice Plan Change 14 and Heritage Plan Change 13

RECEIVED

12 MAY 2023

Clause 6 of Schedule 1 Resource Management Act 1991

Before we get started we'd like to ask a few questions about you. This helps us better understand who we are hearing from.

Gender: Male Female Non-binary/another gender

Age: Under 18 years 18-24 years 25-34 years 35-49 years 50-64 years
 65-79 years over 80 years

Ethnicity: New Zealand European Māori Pacific Peoples Asian
 Middle Eastern/Latin American/African Other European Other

* Required information

Name* ANDREW JAMES KEARAddress* 57 WATFORD ST. STROMAN CHRISTCHURCH Postcode* 8052Email jimkear49@stra.co.nz Phone no. 027 4426803

If you are responding on behalf of a recognised organisation, please provide:

Organisation's name _____

Your role _____

Trade competition and adverse effects* (select appropriate)

I could / could not gain an advantage in trade competition through this submission.

If you are a person who could gain an advantage in trade competition through this submission, are you directly affected by an effect of the proposed plan change/part of the plan change that –

(a) adversely affects the environment, and

(b) does not relate to the trade competition or the effects of trade competition?

 Yes No

* A person who could gain an advantage in trade competition through the submission may make a submission only if you answered Yes to the above, as per clause 6(4) of Schedule 1 of the Resource Management Act 1991.

Please indicate by ticking the relevant box whether you wish to be heard in support of your submission* I wish to speak in support of my submission on Plan Change 13 I wish to speak in support of my submission on Plan Change 14 I do not wish to speak.**Joint submissions** (Please tick this box if you agree) If others make a similar submission, I will consider presenting a joint case with them at the hearing.

If you have used extra sheets for this submission, please attach them to this form and indicate below*

 Yes, I have attached extra sheets. No, I have not attached extra sheets.**Signature of submitter (or person authorised to sign on behalf of submitter)**

A signature is not required if you make your submission by electronic means.

Signature Date 7/5/23

Have your say

Housing and Business Choice Plan Change 14

The specific provisions of the plan change that my submission relates to are as follows:*

(Please continue on separate sheet(s) if necessary.)

SEE ATTACHED : APPENDIX A.

My submission is that:*

(You should clearly state whether you support or oppose the specific proposed provisions or wish to have them amended. You should also state the reasons for your views. Please continue on separate sheet(s) if necessary.)

SEE ATTACHED : APPENDIX A

I seek the following decision from the Council:*

(Please give precise details stating what amendments you wish to see made to the proposed Plan Change. Please continue on separate sheet(s) if necessary.)

SEE ATTACHED : APPENDIX A

Submission to Christchurch City Council

Regarding Christchurch District Plan

Plan Change 14

As a resident of Strowan for over 30 years I wish to express my very real concerns to the proposed Housing and Business Choice Plan Change 14 (PC14). My objection is based on the additional pressure any such High Density Development would have on current infrastructure – transport, storm and waste water system, lack of consideration re parking requirements (street parking is already a real problem in this area) and the long term impact on our neighbourhood. Strowan is a special community with classic character and quality homes. I believe the proposed change to introduce a High Density Residential Zone will impact negatively on our environment, family home asset and lifestyle. Of particular concern is the continuous strip parallel to Papanui Road through Strowan stretching from Papanui Road to Watford Street.

1. INFRASTRUCTURE

Section 14.2.8.5 Policy – Infrastructure servicing for developments.

The plan states the Council will “*Ensure that developments are serviced with all required infrastructure in an effective and efficient manner*”.

Currently the infrastructure is struggling.

Frequent flooding in streets indicate water and storm water issues.

Parking and traffic congestion is diabolical during morning and afternoon school hours or school weekend events. It is often very difficult to get out of own driveway into our street.

There was a significant amount of liquefaction in this particular area following the earthquakes and to my knowledge this has never been alleviated.

Section 14.2.8.6 Policy – Integration and connectivity

The plan intends to “*Avoid significant adverse effects and remedy or mitigate other adverse effects on existing businesses, rural activities or infrastructure.*”

My concern is the long term negative impact potential high density development will have on the nature and special character of our neighbourhood and community. It is already very busy with a schools tennis club and shopping centre and Normans Road is widely used as thoroughfare to Riccarton and other suburbs. Any further development will aggravate the current congestion.

Section 14.6.2 Built form standards

The Council suggests “*The following built form standards shall be met by all permitted activities and restricted discretionary activities RD2, unless otherwise stated*”.

As stated previously the current infrastructure system is ineffective. Increasing development and increasing hard surfaces will intensify flooding problems as the land is not coping now.

2. AMENITY/CHARACTER

Section 14.2.4.2 Policy – High quality, medium density residential development

The plan will *“a Encourage innovative approaches to comprehensively designed, high quality, medium density residential development, which is attractive to residents, responsive to housing demands and reflects the planned urban built character of an area.”*

Strowan is already a very attractive and popular family oriented community neighbourhood.

The quality of homes and environmental outlook appeals to families and they tend to stay for long periods of time. I suggest by increasing the housing through High Density Residential Zoning will only jeopardize the community spirit and focus Strowan currently offers.

3. LACK OF CARPARKING PROVISION FOR VULNERABLE MEMBERS OF OUR COMMUNITY

Section 7.2.1.2 Policy – High trip generating activities *“Provide for the transport needs of people whose mobility is restricted”*

Section 7.2.1.5 Policy – Design of Carparking areas and loading areas *“Be accessible for people whose mobility is restricted”*.

The proposed plan does not make provision for additional parking regardless of personal circumstances. If high density development are implemented everyone will be disadvantaged by the imposed parking limitations.

Parking is already a significant issue and should be prioritised for review before any consideration is given to further development.

4. CHANGE FROM HRZ TO MRZ IN STROWAN – SO AS TO BE CONSISTENT WITH STATED INTENTION

Section 14.2.7 Objective – High Density Residential Zone *“High density residential development near larger commercial centres, commensurate with the expected demand for housing in these areas and the nature and scale of commercial activities, community facilities, and multimodal transport networks planned or provided in the commercial centres”*

Section 14.2.7.2 Policy – High density location *“Enable high density residential development within walking catchments of the: i. City centre zone; ii. Town Centre zones of Riccarton, Papanui, and Hornby; and iii. Other larger commercial centres zoned as Town Centres and Local Centres; to a degree that responds to the planned scale and nature of each centre group and the range of activities planned or provided there.*

We attended a local meeting in Papanui when this plan was first being mooted. At the time we understood our suburb would not be impacted by High or Medium density development.

Conclusion/Recommendation

I reiterate my concerns regarding the implications of any potential High Density development within the Strowan area particularly between Papanui and Watford Street and respectfully request the Council to seriously reconsider how this will be classified.

Thank you for your understanding.

Andrew James Kerr

57 Watford Street

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Sylvia **Last name:** Macaren

On behalf of:

Preferred method of contact Email

Postal address: 2 Tuscany Place

Suburb:

City:

Country: New Zealand

Postcode: 8023

Email: sylvia.maclaren@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.

Attached Documents

File
Sylvia

Robson, Gina

From: Generation Zero <noreply@123formbuilder.com>
Sent: Friday, 12 May 2023 2:21 pm
To: Engagement
Subject: CCC District Plan Changes (PC14) - Generation Zero Quick Submit / 531

This is a submission on the proposed Christchurch District Plan changes via the Generation Zero quick submission form. The feedback below is on PC14.

Form Summary

1. First / Last name	Sylvia Maclaren
2. Email address	sylvia.maclaren@gmail.com
3. Postal Address	2 Tuscany Place Beckenham Christchurch 8023
4. Trade competition/adverse effects:	Option 1: I could not gain in trade competition through this submission
5. Answer if you selected option 2 above:	Are you directly affected by a possible effect of this plan change in a way that it: a. adversely affects the environment, and b. does not relate to the trade competition or the effects of trade competitions
Chapter 6 - Tree Canopy Cover and Financial Contributions	<p>The council will require 20% of new residential developments to be covered by trees, or otherwise pay a financial contribution to help the council plant more trees on public land. Christchurch has an appallingly low tree canopy cover rate of 13% compared to Auckland (18%) and Wellington (30%). Trees have a wide range of environmental, health, social and economic benefits and are important for the future of our city.</p> <p>I support the Tree Canopy Cover rules and Financial Contributions to restore our tree canopy. Trees are important in reducing emissions,</p>

Form Summary

providing shade and temperature control in the summer, alongside the other wide range of economic, health and social effects. I seek that the council retains the tree canopy requirement and contributions plan.

Chapter 14 - Low Public Transport Accessibility Area Qualifying Matter

The council plans to restrict housing in some areas of the city because they are poorly serviced by the lack of current high frequency public transport routes. Some areas solely designated with this qualifying matter such as in Casebrook and Styx are close to rail corridors, existing commercial areas and are serviced by low frequency routes. In the future, these areas could see a boost in service by more buses on current routes or introduction of a commuter rail service.

I oppose the Low Public Transport Accessibility Area Qualifying Matter as I believe that the public transport layout and network will need changes to prepare and accommodate future growth. We should not define future growth in Christchurch based on these routes. This would also artificially limit future housing in our city. I seek that the council drop this qualifying matter.

Chapter 14 - Sunlight Access Qualifying Matter

There are many cities in the world that have high density and are further from the equator than Christchurch. Cities such as Vienna, Copenhagen, Toronto, Geneva, and Calgary are consistently ranked some of the most livable cities in the world. This qualifying matter would reduce the maximum height and size of medium residential buildings below what is legally required. This qualifying matter has been developed with the expressed purpose of protecting and increasing property values rather than increasing the amount of affordable housing for people.

I oppose the Sunlight Access Qualifying Matter. There are many cities in the Northern Hemisphere that are further away from the equator and have a higher level of housing intensification than Christchurch. With a mix of medium and high density housing, these cities are considered some of the most livable cities in the world. This qualifying matter would restrict medium density housing height and size in such a way that would create a less efficient usage of land and limit future housing. I seek that the council drop this qualifying matter.

Chapter 14 - High-Density Residential Zone

The council is required by law to allow residential buildings of at least 6 storeys within a 1.2km radius of commercial centres such as malls and the city centre. The council plan to enable this, while also allowing up to 10 storeys for residential buildings closer to the city centre. This would enable a wider range of dense housing development options. It would also allow more people to live close to services and amenities.

I support high-density housing near the city and commercial centres. We need to allow more people to live near services and amenities to reduce car dependency. This would allow more people to take active and public transport to commute, shop and play. I seek that the council enable 6 to 10 storeys for residential buildings near commercial centres.

Form Summary**Any other comments?**

The message has been sent from 118.149.78.67 nz at 2023-05-12 on Chrome 113.0.0.0

Entry ID: 198

Referrer: android-app://com.google.android.gm/

Form Host: <https://form.123formbuilder.com/6423130/ccc-district-plan-changes-pc14-generation-zero>

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 11/05/2023

First name: Georgie **Last name:** McLaughlin

On behalf of:

Preferred method of contact: Email

Postal address: 39 Watford Street

Suburb: Strowan

City: Christchurch

Country: New Zealand

Postcode: 8052

Email: georgie.fraser@hotmail.co.nz

Daytime Phone: 0273254711

I could not
 Gain an advantage in trade competition through this submission

I am not
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Would you like to present your submission in person at a hearing?

Yes

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Chapter 14 Residential **Points:** 38.1

Support

Oppose

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area

HRZ on Watford St and Strowan area to be changed to a Medium Residential Zone.

My submission is that

I do not support the change of Watford St, Strowan (Halton St, Hawthorne, Watford St and Normans Rd) becoming a high residential zone and seek the council to review this and change to MRZ due to the following:

- The Strowan area has existing significant infrastructure issues which pose a heightened health and safety risk if a MRZ or HRZ (including carparking, vehicle congestion, flooding issues which impact both stormwater and wastewater systems).
- As it is Watford St and surrounding streets are already highly congested with traffic and car parking issues due to the close proximity of St. Andrews College (1,700 students, 250 teachers) and the Waimairi Tennis Club (at peak over the summer period Monday-Sunday). Any increase in housing density in the Strowan community (that is either MRZ or HRZ) will magnify this existing, on-street carparking problem and traffic congestion. Of particular concern is that the PC14 proposes to enable HRZ along Papanui Road and one block either side of Papanui Road which is obviously at a higher level of intensification than even MRZ. As there is little on-street carparking in the area, and no on-site carparking required for new residential developments, carparking associated with ALL of this intensification will further exacerbate the carparking and traffic issues in the Strowan community.
- This also presents a health and safety issue in an area which has many young families and school children present - due to increased traffic congestion, cars double parking and parking over driveways particularly during peak times which would be further exemplified by a HRZ. A public transport system would not solve this problem.
- There are already pockets of significant flooding in rainfall events in Strowan – with Brenchley Avenue being one example where both the stormwater and wastewater networks do not cope in these events. Areas of Watford St are also considered a high flood zone with a high water table. HRZ intensification of the extent proposed in PC14 will exacerbate this across the neighbourhood. This is a known consequence of urban intensification in Christchurch (and elsewhere – recent Auckland flooding).
- The wide streets and traditional style homes make the area unique are special to the residents. Some homes being +100 years old - this history and uniqueness can't and shouldn't be replaced. The area has a number of prominent trees and landscaping on properties which supports the Council's Urban Forest Plan 2023 initiative.
- 'Section 14.2.7 Objective – High Density Residential Zone: a High density residential development near larger commercial centres, commensurate with the expected demand for housing in these areas and the nature and scale of commercial activities, community facilities, and multimodal transport networks planned or provided in the commercial centres'. Strowan does not meet the above criteria (it is not located near a commercial centre).

Attached Documents

File

No records to display.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Jacinta **Last name:** O'Reilly

On behalf of:

Preferred method of contact: Email

Postal address: 57 Winton Street

Suburb:

City:

Country: New Zealand

Postcode: 8014

Email: jacinta_o@yahoo.com

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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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
Jacinta

Robson, Gina

From: Generation Zero <noreply@123formbuilder.com>
Sent: Friday, 12 May 2023 2:14 pm
To: Engagement
Subject: CCC District Plan Changes (PC14) - Generation Zero Quick Submit / 531

This is a submission on the proposed Christchurch District Plan changes via the Generation Zero quick submission form. The feedback below is on PC14.

Form Summary

1. First / Last name	Jacinta O'Reilly
2. Email address	jacinta_o@yahoo.com
3. Postal Address	57 Winton Street Christchurch 8014
4. Trade competition/adverse effects:	Option 1: I could not gain in trade competition through this submission
5. Answer if you selected option 2 above:	Are you directly affected by a possible effect of this plan change in a way that it: a. adversely affects the environment, and b. does not relate to the trade competition or the effects of trade competitions
Chapter 6 - Tree Canopy Cover and Financial Contributions	<p>The council will require 20% of new residential developments to be covered by trees, or otherwise pay a financial contribution to help the council plant more trees on public land. Christchurch has an appallingly low tree canopy cover rate of 13% compared to Auckland (18%) and Wellington (30%). Trees have a wide range of environmental, health, social and economic benefits and are important for the future of our city.</p> <p>I support the Tree Canopy Cover rules and Financial Contributions to restore our tree canopy. Trees are important in reducing emissions,</p>

Form Summary

providing shade and temperature control in the summer, alongside the other wide range of economic, health and social effects. I seek that the council retains the tree canopy requirement and contributions plan.

Chapter 14 - Low Public Transport Accessibility Area Qualifying Matter

The council plans to restrict housing in some areas of the city because they are poorly serviced by the lack of current high frequency public transport routes. Some areas solely designated with this qualifying matter such as in Casebrook and Styx are close to rail corridors, existing commercial areas and are serviced by low frequency routes. In the future, these areas could see a boost in service by more buses on current routes or introduction of a commuter rail service.

I oppose the Low Public Transport Accessibility Area Qualifying Matter as I believe that the public transport layout and network will need changes to prepare and accommodate future growth. We should not define future growth in Christchurch based on these routes. This would also artificially limit future housing in our city. I seek that the council drop this qualifying matter.

Chapter 14 - Sunlight Access Qualifying Matter

There are many cities in the world that have high density and are further from the equator than Christchurch. Cities such as Vienna, Copenhagen, Toronto, Geneva, and Calgary are consistently ranked some of the most livable cities in the world. This qualifying matter would reduce the maximum height and size of medium residential buildings below what is legally required. This qualifying matter has been developed with the expressed purpose of protecting and increasing property values rather than increasing the amount of affordable housing for people.

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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.

Form Summary**Any other comments?**

The message has been sent from 151.210.173.53 nz at 2023-05-12 on Chrome 113.0.0.0

Entry ID: 197

Referrer: <https://l.facebook.com/>

Form Host: <https://form.123formbuilder.com/6423130/ccc-district-plan-changes-pc14-generation-zero>

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Rosa **Last name:** Shaw

On behalf of:

Preferred method of contact: Email

Postal address: 28 Mt Thomas Rd

Suburb:

City:

Country: New Zealand

Postcode: 7471

Email: rosa.shaw177@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 :
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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

Rosa

Robson, Gina

From: Generation Zero <noreply@123formbuilder.com>
Sent: Friday, 12 May 2023 8:00 pm
To: Engagement
Subject: CCC District Plan Changes (PC14) - Generation Zero Quick Submit / 531

This is a submission on the proposed Christchurch District Plan changes via the Generation Zero quick submission form. The feedback below is on PC14.

Form Summary

1. First / Last name	Rosa Shaw
2. Email address	rosa.shaw177@gmail.com
3. Postal Address	28 Mt Thomas Rd Rangiora 7471
4. Trade competition/adverse effects:	Option 1: I could not gain in trade competition through this submission
5. Answer if you selected option 2 above:	Are you directly affected by a possible effect of this plan change in a way that it: a. adversely affects the environment, and b. does not relate to the trade competition or the effects of trade competitions
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Form Summary

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Form Summary**Any other comments?**

The message has been sent from 161.65.230.245 nz at 2023-05-12 on Chrome 113.0.0.0

Entry ID: 202

Referrer: <https://www.generationzero.org/>

Form Host: <https://form.123formbuilder.com/6423130/ccc-district-plan-changes-pc14-generation-zero>

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Jess **Last name:** Gaisford

On behalf of:

Preferred method of contact

Postal address: 57 Kibblewhite Street

Suburb:

City:

Country: New Zealand

Postcode: 8061

Daytime Phone:

I could not
 Gain an advantage in trade competition through this submission

I am not
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Would you like to present your submission in person at a hearing?

Yes

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Attached Documents

File
Jess

Robson, Gina

From: Generation Zero <noreply@123formbuilder.com>
Sent: Friday, 12 May 2023 10:41 pm
To: Engagement
Subject: CCC District Plan Changes (PC14) - Generation Zero Quick Submit / 531

This is a submission on the proposed Christchurch District Plan changes via the Generation Zero quick submission form. The feedback below is on PC14.

Form Summary

1. First / Last name	Jess Gaisford
2. Email address	jessgaisford@gmail.com
3. Postal Address	57 Kibblewhite Street New Brighton 8061
4. Trade competition/adverse effects:	Option 1: I could not gain in trade competition through this submission
5. Answer if you selected option 2 above:	Are you directly affected by a possible effect of this plan change in a way that it: a. adversely affects the environment, and b. does not relate to the trade competition or the effects of trade competitions
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Form Summary**Any other comments?**

The message has been sent from 163.47.236.64 nz at 2023-05-12 on Chrome 112.0.0.0

Entry ID: 205

Referrer: <https://www.generationzero.org/>

Form Host: <https://form.123formbuilder.com/6423130/ccc-district-plan-changes-pc14-generation-zero>

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Lydia **Last name:** Shirley

Organisation: Fire and Emergency

On behalf of:

Preferred method of contact Email

Postal address:

Suburb:

City:

Country: New Zealand

Postcode:

Email: Lydia.Shirley@beca.com

Daytime Phone: +64 3 367 2460

I could not
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Would you like to present your submission in person at a hearing?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

will consider presenting a joint case.

Attached Documents

File

Fire and Emergency Submission - Christchurch City Council - Proposed Plan Change 13 and14

Submission on notified Proposed Heritage Plan Change (PC13) and Proposed Housing and Business Choice Plan Change (PC14)

Intensification Streamlined Planning Process (ISPP)

To: Christchurch City Council

Name of Submitter: Fire and Emergency New Zealand

This submission is made on behalf of Fire and Emergency New Zealand (Fire and Emergency) to Christchurch City Council (CCC) on the Proposed Heritage Plan Change (PC13) and Proposed Housing and Business Choice Plan Change (PC14).

1.1 Context

The primary objective of Fire and Emergency is to reduce the incidence of unwanted fire and the associated risk to life and property. Fire and Emergency seek to:

- protect and preserve life; and
- prevent or limit injury; and
- prevent or limit damage to property and land; and
- prevent or limit damage to the environment¹.

Fire and Emergency's main functions² are –

- (a) to promote fire safety, including providing guidance on the safe use of fire as a land management tool; and
- (b) to provide fire prevention, response, and suppression services; and
- (c) to stabilise or render safe incidents that involve hazardous substances; and
- (d) to provide for the safety of persons and property endangered by incidents involving hazardous substances; and
- (e) to rescue persons who are trapped as a result of transport accidents or other incidents; and
- (f) to provide urban search and rescue services.

Fire and Emergency also has secondary functions to assist in matters to the extent that Fire and Emergency has the capability and capacity to do so and the capability to perform their main functions efficiently and effectively. These secondary functions³ are:

- (a) responding to medical emergencies; and

¹ Fire and Emergency New Zealand Act 2017 section 10(a)(b)

² Fire and Emergency New Zealand Act 2017 section 11(2)

³ Fire and Emergency New Zealand Act 2017 section 12(3)

- (b) responding to maritime incidents; and
- (c) performing rescues, including high angle line rescues, rescues from collapsed buildings, rescues from confined spaces, rescues from unrespirable and explosive atmospheres, swift water rescues, and animal rescues; and
- (d) providing assistance at transport accidents (for example, crash scene cordoning and traffic control); and
- (e) responding to severe weather-related events, natural hazard events, and disasters; and
- (f) responding to incidents in which a substance other than a hazardous substance presents a risk to people, property, or the environment; and
- (g) promoting safe handling, labelling, signage, storage, and transportation of hazardous substances; and
- (h) responding to any other situation, if Fire and Emergency has the capability to assist; and
- (i) any other function conferred on Fire and Emergency as an additional function by the Minister in accordance with section 112 of the Crown Entities Act 2004.

With the wider mandate and changing nature of Fire and Emergency response, the volume of incidents that Fire and Emergency responds to has grown, as has the range of incident types.⁴

On average, Fire and Emergency attend 5,917⁵ incidents annually across Christchurch. This includes an average of:

- 1,317 fires,
- 896 medical emergencies,
- 583 vehicle accidents,
- 419 rescues and public assists⁶, and
- 2,645 HAZMAT/Heat/Pressure/Electrical hazard, false alarms and other emergencies.

Fire and Emergency also face broad challenges, such as the increasing frequency and severity of extreme weather events associated with climate change, increasing intensification of urban areas, and competing access to resources such as water and transport infrastructure. These challenges make the environment Fire and Emergency operates in more complex and puts greater demands on Fire and Emergency as an organisation.

Territorial authorities have a role in ensuring that emergency service providers, such as Fire and Emergency, can continue to operate effectively and efficiently in a changing urban environment. This includes consideration and management of the actual and potential implications on emergency services when giving effect to the National Policy Statement on Urban Development 2020 (NPS-UD), and the Resource Management (Enabling Housing Supply and Other Matters) Act 2021 (Enabling Act).

Fire and Emergency note that Policy 1 of the NPS-UD seeks planning decisions contribute to well-functioning urban environments, which includes urban environments that, as a minimum, have good accessibility and are resilient to the likely current and future effects of climate change. Further, the management of significant risks for natural hazards is a matter of national importance under section 6 of the

⁴ There is an increasing need to respond to a wide range of non-fire emergencies, where Fire and Emergency often coordinate with and assist other emergency services. These include responding to motor vehicle accidents, medical call-outs, technical rescues, hazardous substance incidents such as gas or chemical leaks, and accidents and other incidents at sea. In 2016/17, Fire and Emergency attended more medical emergencies than structure and vegetation fires combined. (Source: NZ Fire Service Annual Report 2016/17)

⁵ Average 2017-2021

⁶ Average 2017-2021. Fire and Emergency note the impact of COVID-19 on the number of incidents over the 2020/2021 period. In some urban environments, Fire and Emergency observed a reduction in fires and traffic accidents over this period. It is suspected this may have been due to people being home more during the pandemic and perhaps making them more vigilant around fires and reduction of unwanted fire, and fewer people in the public domain thereby reducing the likelihood of unwanted fires at beaches and parks.

Resource Management Act 1991 (RMA) and is included in the definition of a Qualifying Matter in the Enabling Act.

This submission seeks to enable Fire and Emergency to carry out its primary objective and functions under the Fire and Emergency New Zealand Act 2017 to provide protection of people, property and the environment in the event of an emergency.

This submission addresses matters relating to activities required to be undertaken to enable an effective emergency response and to provide for the health and safety of people and communities in Christchurch. Issues of particular interest and relevance to Fire and Emergency broadly include:

- ensuring emergency services appliances and Fire and Emergency personnel can adequately access both built and natural environments across Christchurch in the event of an emergency, and
- ensuring new development, including infill development, is adequately serviced by firefighting water supply, and
- maintaining and developing Fire and Emergency's property estate (e.g. fire stations) in strategic locations and at appropriate times to enable Fire and Emergency to continue to meet the demands and expectations of communities as they grow and change.

1.2 Proposed Heritage Plan Change 13

PC13 introduces eleven new Residential Heritage Areas (RHA) with the intent to recognise and protect around 60 buildings, items and building interiors to the Schedule of Significant Historic Heritage identified in the district plan. A 2,320m² section of property at 91 Chester Street East (Lot 1 Deposited Plan 53863, 7,396m²) has been zoned Medium Density Residential and included within the proposed 'RHA 2 – Chester Street East / Dawson Street' as shown in Figure 1 below. It is noted that the remaining 5,076m² of the site where the fire station is located has been rezoned High Density Residential.

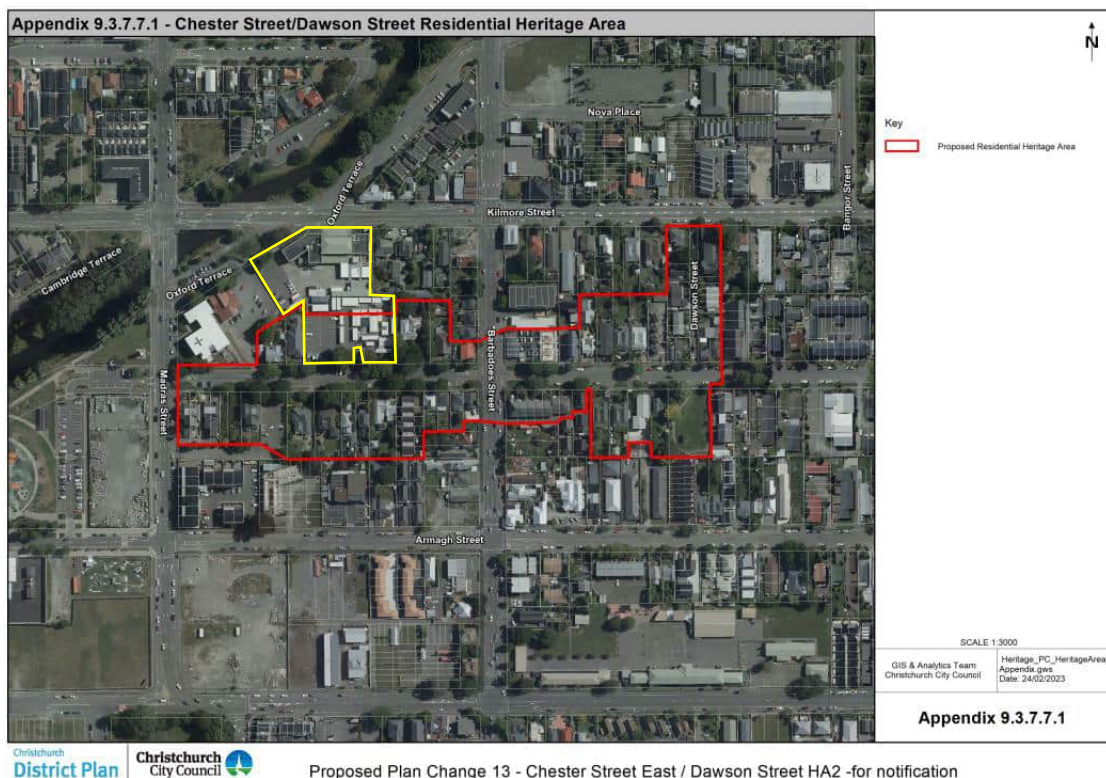


Figure 1. Proposed Residential Heritage Area 2 (shown in red) Fire and Emergency property shown in yellow.

Appendix 9.3.7.8.1 of the notified plan change documentation identifies 91 Chester Street East as an intrusive site within the RHA 2. As defined by PC13, an intrusive building or site as it relates to RHAs “are

buildings or sites which detract from and are inconsistent with the heritage values and significance of the heritage area. Vacant lots are also included as intrusive within the streetscape of the heritage area”.

Prior to notification of PC13, engagement occurred between Fire and Emergency and CCC in relation to 91 Chester Street East. This is recorded in the section 32 report which states:

Feedback requesting the removal of the Fire Station land situated at 91 Chester Street East was considered at a late stage, and a reduction of the site to be included in the Chester Street East/Dawson Street RHA was identified by staff as a possible compromise, however the details of this were not able to be agreed prior to notification. It is anticipated this will be addressed through submissions.

The site at 91 Chester Street East is held in the same Record of Title as the Christchurch City Fire Station (accessed via Kilmore Street) and is an integral part of the wider site. The site is currently occupied by portacom buildings which are used by Fire and Emergency. The site is intended to be developed into district offices and a resource garage which has been a longstanding proposal and integral to the functioning of the wider site.

While details around the site layout and built form have not been confirmed, the future district offices are likely to be single storey buildings and similar to the built form which surrounds the site. The resource garage will have the potential to be 5-6 metres in height.

The proposed RHAs introduce new rules and performance standards for developments within RHAs. For example, in RHAs, new buildings and alteration to building exteriors require resource consent as a restricted discretionary activity under Rule 9.3.4.1.3 RD6, except in situations specified in 9.3.4.1.3 RD6(c) and subject to matters of discretion set out in Rule 9.3.6.4.

For Fire and Emergency, this may require additional resource consents for any proposed new buildings on the site and require the buildings to be consistent with maintaining and enhancing the collective heritage values and significance of the heritage area and having regard to a suite of matters of discretion. In addition, any future alteration to building exteriors within the site would also likely require resource consent and based on the matters of discretion, require consultation with Heritage New Zealand Pouhere Taonga among other considerations, which will likely result in additional time and cost barriers for Fire and Emergency. These are likely to have operational and functional constraints for Fire and Emergency especially considering 91 Chester Street East is not subject to identified heritage items or within any heritage settings within the site.

Given the above, and that the future built form of 91 Chester Street East is unlikely to be inconsistent with the surrounding environment, it is considered that any potential development on the site would have minimal impact on the heritage area as built form already exists on the site.

Fire and Emergency request that the boundaries of RHA 2 are reduced to exclude the Fire and Emergency City Station site at 91 Chester Street East as shown in Figure 2 below. This is due to the additional time, costs and constraints imposed on this strategically significant site with no heritage items, buildings or settings present. Fire and Emergency need to be able to develop buildings that meet their operational and functional requirements. The future development of this site will be required to enable Fire and Emergency to carry out their primary objective and functions under the Fire and Emergency New Zealand Act 2017 to provide for the health and safety of people and communities in Christchurch.



Figure 2: Requested relief to remove 91 Chester Street East from RHA 2.

1.3 Emergency Service Access

Fire and Emergency requires adequate access to new developments, associated structures and the natural environment to ensure that they can respond in emergencies. This includes access in the event of fire, natural hazard, hazardous substances, medical or a rescue or assist.

Within the urban environment, the NPS-UD encourages higher residential densities, more varied housing typologies such as larger multi-unit development as well as a more compact urban form generally. While a more compact urban form focused on walkability and intensification around public transport (and subsequent mode shift) can reduce congestion and subsequently emergency response times, intensification and infill housing in Christchurch are challenging traditional access to properties for fire and other emergencies. This includes both vehicle access to the source as well as physical access by Fire and Emergency personnel to perform rescues and duties, where obstructions and site layout inhibit the use of lifesaving appliances such as ladders, hoses and stretchers.

The changes consequential to the NPS-UD will create new challenges for emergency services. Fire and Emergency consider it is vital for the health, safety and wellbeing of communities that the needs of emergency services are taken into account as new urban development is being planned. It is also important that future development areas are designed to be well-functioning and resilient to ensure that communities / residents are able to evacuate in the event of an emergency. If emergency responders cannot access people in the event of an emergency, this will not enable and provide for well-functioning and resilient communities and will not achieve Policy 1 of the NPS-UD. With regard to this, Fire and Emergency support the qualifying matter restricting developments to areas which are located within the key transport corridors.

1.3.1 Pedestrian only developments

Fire and Emergency note that as a result of the NPS-UD, the requirement for onsite parking in all residential developments has been removed, increasing the number of developments that provide only pedestrian access.

Fire and Emergency acknowledge that the New Zealand Building Code (NZBC) C5 specifies access and safety requirements for firefighting operations, where certain buildings must be designed and constructed so that there is a low probability of firefighters or other emergency services personnel being delayed in or impeded from assisting in rescue operations and performing firefighting operations. Buildings must also be

designed and constructed so that there is a low probability of illness or injury to firefighters or other emergency services personnel during rescue and firefighting operations.

Of particular note, a performance requirement of C5 is that buildings must be provided with access for fire service vehicles to a hard-standing from which there is an unobstructed path to the building within 20m of the firefighter access into the building and the inlets to automatic fire sprinkler systems or fire hydrant systems, where these are installed (among other requirements). These performance requirements do however not apply to detached dwellings, within household units in multi-unit dwellings, or to outbuildings, and ancillary buildings.

Given the shortfalls with the NZBC and the lack of clarity/consistency in the interpretation/application of the NZBC and the RMA, Fire and Emergency are concerned that pedestrian only access developments and inadequate vehicle access provisions can prevent efficient access to properties by responders in event of a fire or emergency or to use tools and equipment effectively if required. This has the potential to significantly increase the risk to life and property.

Should developments not provide a vehicle access and/or provides for pedestrian only access, this means that many developments will be unable to comply with the NZBC Fire and Emergency vehicular access requirements and subsequently firefighter access is not provided.

In the interim period while the NZBC catches up with the changing urban environment, Fire and Emergency consider that the RMA needs to address this matter up front in order to manage the use, development and protection of natural and physical resources which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety in accordance with Section 5 of the RMA.

To support effective and efficient access and manoeuvring of crew and equipment for firefighting, medical, rescue and other emergency response to developments across Christchurch city, Fire and Emergency require:

- Pedestrian accessways that are clear, unobstructed and well-lit,
- Wayfinding for different properties on a development are clear in day and night,
- That developments give effect to the guidance provided in the Fire and Emergency's 'Designer's guide' to firefighting operations Emergency vehicle access' (December 2021)⁷,
- Pedestrian accessways have a minimum width of:
 - 3m on a straight accessway,
 - 6.2m on a curved or cornered accessway, and
 - 4.5m space to position the ladder and perform operational tasks.

1.3.2 Emergency vehicle access

Adequate fire appliance access to both the source of a fire (or other emergency) and a firefighting water supply is essential to the efficient operation of Fire and Emergency. The requirements for firefighting access are set out in the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (SNZ PAS 4509:2008)⁸, are further detailed in Fire and Emergency's 'Designer's guide' to firefighting operations Emergency vehicle access' (December 2021).

These requirements are necessary for Fire and Emergency to be able to operate pumping appliances from a hard standing. Often, this can be done from the public road, and this is how Fire and Emergency prefers to operate where possible. Pumping appliances are vehicles used to pump water for firefighting (refer Appendix A of the Fire and Emergency's 'Designers' guide). They carry a relatively small amount of water (1,350–

⁷ The Fire and Emergency Designers Guide to Firefighting Operations for emergency vehicle access provides help to ensure building designs comply with the NZBC C5 and can be found here: <https://www.fireandemergency.nz/assets/Documents/Business-and-Landlords/Building-and-designing-for-fire-safety/F5-02-GD-FFO-emergency-vehicle-access.pdf>

⁸ The New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 can be found here: <https://fireandemergency.nz/assets/Documents/Files/N5a-SNZPAS-4509-2008-NZFS-Firefighting-water-supplies-Code-of-practice.pdf>

2,000 litres) and have a limited length of hose. Accordingly, Fire and Emergency must have access to a water supply and must also be able to base operations near the fire source, so firefighters can reach the fire with water.

Fire and Emergency has strong concerns that even in situations where the NZBC applies, many recent developments are not compliant with the performance criteria of C5 and therefore do not comply with the NZBC (in particular 20m access to the building for firefighting or 75m hose length to the furthest point). In addition, there have been recent examples of residential applications that have provided on-site alternative water supply for firefighting to respond to insufficient reticulated supply, but inadequate emergency access meaning that a fire appliance would not be able to reach the firefighting water supply.

For these reasons, CCC need to carefully consider how emergency vehicle access will be provided for new residential developments.

Given the apparent gap in the NZBC, significant consideration needs to be given to new rules and a related policy framework to enable adequate access to detached residential dwellings by emergency vehicles and personnel (i.e. SH risk group buildings not covered by the NZBC).

For all other developments to which C5 applies, Fire and Emergency request that, where not already provided for, the Christchurch District Plan introduce rules that 'duplicate' the requirements of the Part 6: firefighting of C/AS1 and C/AS2. Fire and Emergency consider that this approach would prevent resource consents being issued that could not be implemented because the layout does not demonstrate compliance with the performance requirements and need to be redesigned to provide sufficient firefighter access. This could mitigate some risks, especially when activities that currently require resource consent move to permitted.

Further, Fire and Emergency seek the provision of adequate access through voluntary measures such as 'best practice' recommendations in the urban design guides. These proposed measures would encourage developments to consider early in their design the requirements of emergency services. Fire and Emergency recommends developments give effect to the guidance provided in the Firefighting Operations Emergency Vehicle Access Guide.

Adequate provision for emergency responder access will enable Fire and Emergency to:

- Get into the building and to move freely around their vehicles.
- Gain access to rear dwellings on long sites where hose run lengths become an issue.
- Ensure the safety of firefighters and enable firefighters to deal quickly to smaller undeveloped fires before they develop and endanger members of the public and the firefighters who may need to assist them in either rescues and/or firefighting.

1.3.3 Carparking

Fire and Emergency is already encountering new development where emergency vehicle access along the roading corridor has been challenging. Issues with emergency vehicle access in these locations can be caused by narrow roads / laneways, higher density typologies and a lack of off-street parking available resulting in cars parking along both sides of already narrow residential streets. Implications for emergency services include on-road obstructions, meaning emergency vehicles have difficulty or are unable to manoeuvre, as well as an inability to access buildings and locate fire hydrants in an emergency. Inadequate parking lengths along frontages also have been encountered generally from vehicles parking over footpaths in driveways, blocking access.

Fire and Emergency acknowledges that, where no off-street parking is required, there may also be no requirement to provide for vehicular access to a property. In these situations, emergency service staff would need to enter a property on foot and/or remove fences and other structures to provide access. Regardless, there needs to be sufficient clearance to access properties with heavy emergency equipment.

Despite Policy 11 and clause 3.38 of the NPS-UD, consent authorities can continue to consider the effects of car parking supply and demand in resource consent applications. Given that section 104(1) requires a consent authority to have regard to 'any actual and potential effects on the environment of allowing [an] activity', an adverse effect of a particular activity could include adverse traffic effects on the local or wider road network.

Section 108AA of the RMA relates to requirements for conditions of resource consents. Section 108AA(1)(b) provides that a condition must not be included in a resource consent for an activity unless the condition is directly connected to one or both of an adverse effect of the activity on the environment and/or an applicable rule, or a national environmental standard.

Fire and Emergency supports the consideration of parking made through the PC14 amendments made to the matter of control 14.15.1 Residential Design Principles. This would enable conditions to be imposed on a case-by-case basis, having regard to the effects of a particular activity.

This will see that CCC and the community are still able to consider any positive or adverse effects, and ensure any adverse effects can be avoided, remedied and mitigated. This would likely be most appropriate for large development applications with a significant under-provision of parking for the type and location of the activity. Consideration should also be given to the requirements of a transportation assessment to determine the impact of development of the roading network. It could also be necessary to use a condition of consent to tie a development application to preparing or updating a comprehensive parking management plan.

1.3.4 Reduced setbacks

The minimum building setbacks from boundaries and between buildings in the Medium Density Residential Zone is 1m on side boundaries from buildings on all sides increasing the risk of fire spreading and can inhibit Fire and Emergency personnel from getting to the fire source. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area.

The C3 of the NZBC is relevant here whereby buildings must be designed and constructed so that there is a low probability of fire spread to other property vertically or horizontally across a relevant boundary. Achieving this functional requirement is however limited by the mechanisms by which this is achieved (i.e. Acceptable Solutions) and buildings of which such requirements apply.

It is therefore vital that the NZBC is enforced and complied with to reduce the risk of fire spread in the intensified urban areas. This includes careful consideration of requirements to use non-combustible building materials to slow the vertical and horizontal spread of fire.

Fire and Emergency encourage CCC to consider integrating these considerations into the urban design guides to align with the NZBC and prompt developments to consider fire risk mitigations early on in design.

1.3.5 Other legislative requirements

PC14 will enable developments of medium and high densities which in most circumstances would increase the occupancy of buildings. As such, regulations under the Fire and Emergency New Zealand Act 2017 relating to evacuation schemes require consideration. These requirements relate to 'relevant buildings' (as defined by the Fire and Emergency New Zealand Act 2017) where a building or part of a building is used for one or more of the following purposes:

- (i) *the gathering together, for any purpose, of 100 or more persons:*
- (ii) *providing employment facilities for 10 or more persons:*
- (iii) *providing accommodation for 6 or more persons (other than in 3 or fewer household units):*
- (iv) *providing an early childhood education and care centre (other than in a household unit):*

- (v) *providing nursing, medical, or geriatric care (other than in a household unit):*
- (vi) *providing specialised care for persons with disabilities (other than in a household unit):*
- (vii) *providing accommodation for persons under lawful detention (not being persons serving a sentence of home detention or community detention, or serving a sentence of imprisonment on home detention, or on parole subject to residential restrictions imposed under section 15 of the Parole Act 2002):*
- (viii) *any other prescribed purpose; or...*

The NZBC does not stipulate the need for an alarm system that would support the expected coordination of an “Approved Evacuation Scheme” under the evacuation Regulations 2018. This increases the risk to the health and safety of people and communities where buildings are not adequately designed or built to provide for fire safety and evacuation procedures.

Until such time where the NZBC is updated to account for the intensification of the residential built environment, Fire and Emergency, as a minimum, seek that an advice note within the district plan be included to direct plan users to the Fire and Emergency New Zealand Act 2017, specifically, Clause 191 – Regulations relating to fire safety and evacuation procedures in relation to buildings, Clause 192 – Regulations relating to evacuation schemes for buildings and Part 2 of Fire and Emergency New Zealand (Fire Safety, Evacuation Procedures, and Evacuation Schemes) Regulations 2018 which relates to Evacuation Schemes.

1.4 Firefighting water supply

It is critical for Fire and Emergency that water supply infrastructure is in place prior to any development commencing and that this water supply has adequate capacity and pressures available to service the future growth. Fire appliances carry a limited amount of water; therefore, it is necessary that adequate water capacity and pressure be available to Fire and Emergency to control or extinguish a fire. In the urban areas of Christchurch, water is sourced from the reticulated water supply network however where reticulation is not available or limited (i.e. trickle fed), alternative water sources will be required. This may be in the form of dedicated water tanks or ponds for firefighting. Adequate physical access to this water supply for new development (whether reticulated or non-reticulated) is also essential.

Adequate capacity and pressure for each development can be determined through the SNZ PAS 4509:2008. The SNZ PAS 4509:2008 is a non-mandatory New Zealand Standard that sets out the minimum requirements for firefighting water and access in order for Fire and Emergency to operate effectively and efficiently in an emergency.

For subdivision and developments, provision of a firefighting water supply is required by Rule 8.7.7(b) of the operative Christchurch District Plan. Additional built form standards also exist in Chapter 14 Medium Density Residential standards (Rule 14.5.2.14), High Density Residential Zone (Rule (14.6.2.13), Commercial Zone standards (Rule 15.5.2.8 & 15.8.2.7) and have been further amended through PC14 to consider where the reticulated water supply is not available, an alternative firefighting water supply should be provided in accordance with SNZ PAS 4509:2008.

Fire and Emergency consider it essential that urban development does not occur out of sequence with the delivery of key strategic infrastructure (network extensions or upgrades), or development is not enabled where there is potential or known infrastructure capacity constraints in relation to the Three Waters, in particular the water supply network.

Fire and Emergency considers that all subsequent subdivision and development should be subject to development standards within the district plan requiring all applicants to demonstrate by way of providing evidence (i.e. hydrant flow testing) that their development can be adequately serviced for firefighting water

supply in accordance with the SNZ PAS 4509:2008 across all zones. If this does not become part of the consenting regime, there will likely be development with inadequate firefighting water supply with potentially serious consequences for life and property. Fire and Emergency strongly support CCCs approach requiring sufficient the provision of firefighting water supply through built form or activity standards through the district plan, including the amendments proposed through PC14.

1.5 Demand on emergency services

Fire and Emergency has a Statement of Performance Expectations⁹ which sets out targets to delivering timely and effective fire response and suppression services as well as other services¹⁰.

Community need for Fire and Emergency services has been increasing, thereby increasing Fire and Emergency's presence on the roads and need for fast and efficient access to incidents across Christchurch.

Urban growth and intensification coupled with the increasing rate of extreme weather events and risk from natural hazards and other environmental and demographic changes across communities is likely to result in a greater demand on emergency services and consequently can affect response times if not managed.

Fire and Emergency's response time commitments to the government and community are key determinants for the location of new, or expansion of existing fire stations. Fire stations therefore need to be strategically located within and throughout communities to maximise their coverage and maintain appropriate response times and efficiently provide for the health and safety of people and communities.

As urban areas develop and intensify, the ability to construct and operate fire stations in locations which will enable reasonable response times to fire and other emergencies is critical for the health, safety, and wellbeing of people in the community. In this regard, it is noted that Fire and Emergency is not a requiring authority under section 166 of the RMA and therefore does not have the ability to designate land for the purposes of fire stations.

Provisions within the rules of the District Plan therefore may be the best way to facilitate the development of any new emergency service facilities as the city grows. Ongoing, and more frequent engagement with Fire and Emergency in terms of growth projections and demographic changes will assist us in understanding where we may need new emergency service facilities in the future. This will be particularly important during plan review and plan changes that seek to re-zone large portions of land to facilitate development.

Fire and Emergency seek the following decision from the local authority:

Appendix A sets out the details of Fire and Emergency's submission, including the amendments sought by Fire and Emergency to specific provisions in PC13 and PC14, and the reasons for the amendments.

Fire and Emergency would welcome and questions or further engagement on matters raised in the submission.

Fire and Emergency may wish to be heard in support of its submission depending upon the proposed amendments to the PC13 and PC14 provisions as notified.



⁹ Statement of Performance Expectations 2022/23 can be found here: <https://www.fireandemergency.nz/assets/Documents/Files/Statement-of-Performance-Expectations-2022-2023.pdf>

¹⁰ Fire and Emergency Act 2017 sections 10-12

Signature of person authorised to sign on behalf of
Fire and Emergency

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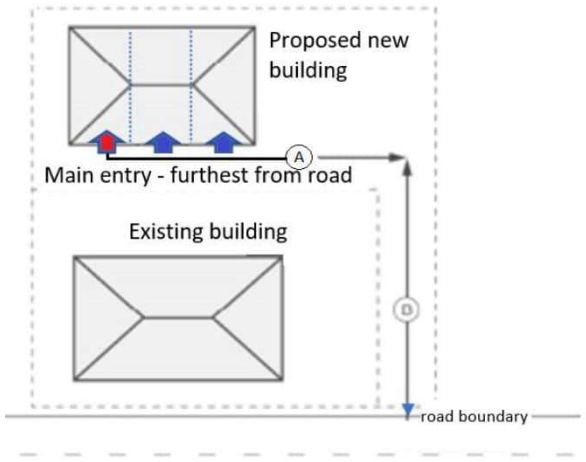
Appendix A

The following table sets out the specific position and any amendments sought by Fire and Emergency. Where specific amendments to provisions of PC13 and PC14 are sought, these amendments are shown as red underline (for new text sought) and ~~word~~ (for deletion).

ID	Proposed provision	Support /Oppose	Submission	Requested relief
Chapter 3: Strategic Direction				
1	3.3.7 Objective – Well functioning urban environments	Support	Fire and Emergency support new objective 3.3.7(a) to the extent that it anticipates a well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Fire and Emergency considers that this includes the provision of adequate emergency access and sufficient firefighting water supply.	Retain as notified.
2	3.3.8 Objective – Urban growth, form and design	Support	Fire and Emergency supports 3.3.8(ix) as it promotes the safe, efficient, and effective provision and use of infrastructure, including the optimisation of the use of existing infrastructure. This would include the water supply network.	Retain as notified.
Chapter 7: Transport				
3	7.2.1.9 Policy – Pedestrian Access	Support in part	Fire and Emergency supports policy 7.2.1.9 to the extent that the policy requires pedestrian access be designed to a sufficient width and grade meeting the requirements of all users. Given the importance and role of emergency services, Fire and Emergency request that the policy be amended to explicitly include reference to emergency services.	Amend as follows: 7.2.1.9 Policy – Pedestrian Access a. Pedestrian access is designed to: i. Be sufficient width and grade that the pedestrian access meets the access requirements of all users, including persons with a disability of with limited mobility <u>and emergency services</u> . ii. ...
4	7.4.4.27 Pedestrian Access	Support in part	Fire and Emergency’s submission raises concern with pedestrian-only access developments not providing for emergency responder access. The proposed matters of discretion set out in 7.4.4.27 that apply to Rule 7.4.3.7b do not consider the ability for	Amend as follows: 7.4.4.27 Pedestrian Access a. The following are matters of discretion for Rule 7.4.3.7 b:

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			emergency responders to undertake operational activities including movement of ladders.	<ul style="list-style-type: none"> i. whether the pedestrian access is suitable for use by persons with a disability or with limited mobility; ii. whether any alternative pedestrian access is provided and the formation and safety of that alternative; iii. the effects on the safety and security of people using the pedestrian access and those occupying residential units on the site; and iv. the functionality of the pedestrian access to meet the needs of occupants including but not limited to the transportation of rubbish and recycling for collection and the ability for cyclists to safely access any private and shared cycle storage areas, and v. <u>whether the pedestrian access is suitable for use by emergency services.</u>
5	Appendix 7.5.7 Access design and gradient	Support in part	<p>Fire and Emergency support in part:</p> <ul style="list-style-type: none"> • 7.5.7(a) – that requires all vehicle access to and within a site to be in accordance with the standards set out in Table 7.5.7.1, subject to the relief sought in Table 7.5.7.1. • 7.5.7(b) - to the extent that provision of passing bays may provide a hardstand area for fire appliances to operate in scenarios where vehicle accessways exceed 50m. • 7.5.7(c) – to the extent that it requires either a combined vehicle-pedestrian access or a dedicated pedestrian access with associated minimum standards. Fire and Emergency request that these minimum standards be amended to provide for emergency responder access for reasons set out in Section 1.3.1 above. 	<p>Amend as follows:</p> <p>Appendix 7.5.7 Access design and gradient</p> <p>...</p> <ul style="list-style-type: none"> c. For developments of three or more residential units, each unit shall be accessed by either a combined vehicle-pedestrian access or a dedicated pedestrian access that is: <ul style="list-style-type: none"> (i) a minimum <u>formed width</u> of 3 metres <u>in width on a straight accessway, with a formed pathway of at least 4.5m;</u> or (ii) <u>6.2m on a curved or cornered accessway;</u> and

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			<ul style="list-style-type: none"> 7.5.7(h) – to the extent that it considers vehicle access for firefighting where a building is either located outside of a reticulated area, or further than 75m from the nearest road that is fully reticulated. This sets a minimum formed width of 3.5m and a height clearance of 4m. Section 1.3.2 of this submission sets out the minimum requirements for fire appliance access which includes a minimum of 4m vehicle access width in order to enable Fire and Emergency personnel to manoeuvre around the vehicle in an emergency. Correspondence with CCC post notification regarding Appendix 7.5.7(h) indicated that proposed changes to this clause were omitted from notification in error. Amendments are sought regarding this clause to provide sufficient access for emergency appliances. 7.5.7(n) – to the extent that it sets maximum gradients for vehicle accesses. Fire and Emergency further request amendments to the 7.5.7(n) as per relief. 	<p>(iii) each access shall be from the street to the front door of the unit and any garage or parking space for that unit.</p> <p>...</p> <p>h. For the purposes of access for firefighting, where a building is either:</p> <ol style="list-style-type: none"> located in an area where no fully reticulated water supply system is available; or located further than 75 metres from the nearest road that has a fully reticulated water supply system including hydrants (as required by NZS 4509:2008). <u>75 metres is measured from the road boundary via an existing or proposed property access, to the main entry furthest from the road (Figure 7A); or</u> <u>located in the Residential Hills Precinct and is a residential unit on a rear site.</u> <p>vehicle access shall have a <u>must be a</u> minimum formed width of 3.5 4 metres <u>for its entire length</u>, and a height clearance of 4 metres. Such vehicle access shall be designed <u>and maintained to be</u> free of obstacles that could hinder access for emergency service vehicles.</p> <p>...</p> <p>n. The maximum gradient at any point on a vehicle access shall be in accordance with Table 7.5.7.2, except a maximum gradient of 1 in 5 (minimum 4.0 metres long transition ramps for a change of grade 1 in 8 or greater) shall apply for accesses that are identified in (g and <u>h</u>). For curved accesses, the maximum gradient shall be measured on the inside of a curved vehicle access.</p>

ID	Proposed provision	Support /Oppose	Submission	Requested relief												
6	Figure 7A	New	The proposed Figure 7A is intended to assist plan users and provide clarity in relation to 7.5.7(h)(ii).	<p>A+B Less than or equal to 75m</p> 												
7	Table 7.5.7.1 – Minimum requirement for private ways and vehicle access	Support in part	<p>Fire and Emergency require a minimum formed access width of 4m for emergency vehicles and a minimum 4m height clearance to be able to effectively and efficiently access sites with their fire appliances. It is noted that Appendix 7.5.7(h) requires a minimum access width of 4m where an accessway exceeds 75m (as per proposed new Figure 7A above). This is in acknowledgment that where accessways do not exceed 75m, Fire and Emergency should be able to operate from the road. The proposed minimum formed width for Table 7.5.7.1 a. and b. requires a 3.0m minimum formed width. While it would be Fire and Emergency's preference that Fire and Emergency are able to access all properties with their vehicles, Fire and Emergency support the 3m width that applies to residential activity and offices in recognition that medium and high-density zones result in a more</p>	<p>Amend as follows: Table 7.5.7.1 – Minimum requirement for private ways and vehicle access:</p> <table border="1" data-bbox="1444 917 2089 1300"> <thead> <tr> <th></th> <th>Activity</th> <th>Minimum formed width (metres)</th> <th>Central City height clearance (metres)</th> </tr> </thead> <tbody> <tr> <td>a.</td> <td>Residential activity and offices</td> <td>3.0</td> <td>3-5 4.0</td> </tr> <tr> <td>b.</td> <td>Residential activity and offices</td> <td>3.0</td> <td>4.0</td> </tr> </tbody> </table> <p><i>Advice note: For any buildings that are greater than 75m from the road, Appendix 7.5.7 Access, gradient and design clause h is applicable.</i></p>		Activity	Minimum formed width (metres)	Central City height clearance (metres)	a.	Residential activity and offices	3.0	3-5 4.0	b.	Residential activity and offices	3.0	4.0
	Activity	Minimum formed width (metres)	Central City height clearance (metres)													
a.	Residential activity and offices	3.0	3-5 4.0													
b.	Residential activity and offices	3.0	4.0													

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			<p>compact environment. However, this support is subject to these buildings being no more than 75m from the road and that the relief sought in Appendix 7.5.7(h) is accepted in order to manage risk relating to emergency service access in the medium and high-density environments.</p> <p>The height clearance of 3.5m in a. would significantly impact the ability of emergency responders to provide effective and efficient assistance and therefore seek that this be increased to 4m in line with the SNZ PAS 4509:2008. Without the changes recommended above, assessment of non-compliance with this standard against matter of discretions is challenging as the permitted baseline is already insufficient.</p>	
Chapter 8: Subdivision, Development and Earthworks				
8	8.2.3.2 Policy – Availability, provision and design of, and connections to, infrastructure	Support	Fire and Emergency support the amendment to Policy 8.2.3.2 to include reference to ‘and development’ whereby requiring both subdivision and development to not occur in areas where infrastructure is not performing, serviceable or functional which would include the water supply network.	Retain as notified.
9	8.5.1.2 Controlled Activities C8	Support	<p>Fire and Emergency support subdivision being subject to Rule 8.6.7 that requires the provision of a sufficient water supply and access to water supplies for firefighting consistent with SNZ PAS 4509:2008.</p> <p>Additionally, Fire and Emergency further support the subsequent matter of control, 8.7.4.3k ‘Servicing and infrastructure’ requires consideration of the suitability of the proposed water supply for firefighting purposes, including the extent of compliance with SNZ PAS:4509:2008 in respect of the health and safety of the community, including neighbouring properties.</p>	Retain as notified.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
10	8.5.1.2 Controlled Activities C9	Support	Fire and Emergency support subdivision being subject to Rule 8.6.7 that requires the provision of a sufficient water supply and access to water supplies for firefighting consistent with SNZ PAS 4509:2008. Additionally, Fire and Emergency further support the subsequent matter of control 8.7.4.3k 'Servicing and infrastructure' requires consideration of the suitability of the proposed water supply for firefighting purposes, including the extent of compliance with SNZ PAS:4509:2008 in respect of the health and safety of the community, including neighbouring properties.	Retain as notified.
11	8.5.1.2 Controlled Activities C10	Support	Fire and Emergency support subdivision being subject to Rule 8.6.7 that requires the provision of a sufficient water supply and access to water supplies for firefighting consistent with SNZ PAS 4509:2008. Additionally, Fire and Emergency further support the subsequent matter of control, 8.7.4.3k 'Servicing and infrastructure' requires consideration of the suitability of the proposed water supply for firefighting purposes, including the extent of compliance with SNZ PAS:4509:2008 in respect of the health and safety of the community, including neighbouring properties.	Retain as notified.
12	8.6.3 – Access	Support in part	Fire and Emergency support the access Rule 8.6.3(a) and the requirement to comply with the standards set out in Chapter 7, subject to the amendments sought in Appendix 7.5.7.	Retain as notified.
Chapter 9: Natural and Cultural Heritage				
13	9.3.4.1.1 Permitted activities P2	Oppose in part	Fire and Emergency seek clarity as to whether an intrusive building within a residential heritage area would be subject to the activity specific standards set out in permitted activity rule 9.3.4.1.1. This would result in unnecessary cost and time delays for Fire and Emergency to repair a building that is not of heritage value.	See relief sought in section 1.2 above.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			Notwithstanding this, Fire and Emergency has sought in in section 1.2 of this submission, that 91 Chester Street East be removed from RHA 2.	
14	9.3.4.1.1 Permitted activities P3	Oppose in part	91 Chester Street East, as notified is subject to 9.3.4.1.1 P3 (a)(iv). Given the site or associated buildings on site have no heritage fabric, it is assumed that the activity specific standard is not applicable. Notwithstanding this, Fire and Emergency has sought in in section 1.2 of this submission, that 91 Chester Street East be removed from RHA 2.	See relief sought in section 1.2.
15	9.3.4.1.1 Permitted activities P12	Oppose in part	Fire and Emergency recognise that this would enable the demolition or relocation of the buildings located at 91 Chester Street East as a permitted activity. Notwithstanding this, Fire and Emergency has sought in in section 1.2 of this submission, that 91 Chester Street East be removed from RHA 2.	See relief sought in section 1.2.
16	9.3.4.1.1 Permitted activities P13	Oppose in part	Fire and Emergency recognise that this would enable the construction of a fence or wall to 1.5m in height at 91 Chester Street East as a permitted activity. Notwithstanding this, Fire and Emergency has sought in in section 1.2 of this submission, that 91 Chester Street East be removed from RHA 2.	See relief sought in section 1.2
17	9.3.4.1.3 Restricted discretionary activities RD6	Oppose	Whilst the details around the site layout and built form have not been confirmed, the future district offices are likely to be single storey buildings and similar to the built form which surrounds the site. The resource garage will have the potential to be 5-6 metres in height. For Fire and Emergency, this would require additional resource consents for any proposed new buildings on the site including offices and a resource garage and would require the buildings to be consistent with maintaining and enhancing the collective heritage values and significance of the heritage area, and have particular regard to a suite of matters of discretion.	See relief sought in section 1.2.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			<p>In addition, any future alteration to building exteriors within the site would also likely require resource consent and based on the matters of discretion, require consultation with Heritage New Zealand Pouhere Taonga among other considerations, which will have additional time and cost barriers for the development.</p> <p>These are likely to have operational and functional constraints for Fire and Emergency especially considering 91 Chester Street East does not have any identified heritage items or heritage settings within the site.</p> <p>Fire and Emergency consider that it would be appropriate to remove 91 Chester Street from the RHA 2, enabling the development necessary to carry out their duty to provide for the health and safety of people and the community in Christchurch.</p>	
18	9.3.4.1.3 Restricted discretionary activities RD8	Support	<p>Fire and Emergency support the rule for any new buildings on a site in the High Density Residential Zone located outside a RHA as it is not likely that there will be any future additions to the Christchurch City Station site which is located in this zone.</p> <p>It is also noted that the site at 91 Chester Street East that Fire and Emergency are seeking the removal from RHA 2 is zone Medium Density Residential. Therefore, this rule would not be applicable to any development in the Medium Density Residential Zone portion of the site.</p>	Retain as notified.
19	9.3.6.4 Residential Heritage Areas (excluding Akaroa Township Heritage Area) - new buildings, fences and walls, and exterior alterations to buildings	Oppose in part	<p>Whilst the details around the site layout and built form have not been confirmed, the future district offices are likely to be single storey buildings and similar to the built form which surrounds the site. The resource garage will have the potential to be 5-6 metres in height.</p> <p>For Fire and Emergency, this would require additional resource consents for any proposed new buildings on the site including offices and a resource garage and would require the buildings to be</p>	See relief sought in section 1.2

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			<p>consistent with maintaining and enhancing the collective heritage values and significance of the heritage area, and have particular regard to a suite of matters of discretion.</p> <p>In addition, any future alteration to building exteriors within the site would also likely require resource consent and based on the matters of discretion, require consultation with Heritage New Zealand Pouhere Taonga among other considerations, which will have additional time and cost barriers for the development.</p> <p>These are likely to have operational and functional constraints for Fire and Emergency especially considering 91 Chester Street East is not subject to identified heritage items or within any heritage settings within the site.</p> <p>Fire and Emergency consider that it would be appropriate to remove 91 Chester Street from the RHA 2, enabling the development necessary to carry out their duty to provide for the health and safety of people and the community in Christchurch.</p>	
20	9.3.6.6 Sites in the High Density Residential Zone and Residential Visitor Accommodation Zone Sharing a boundary with a Residential Heritage Area	Support	<p>Fire and Emergency generally support this matter of discretion as it is not likely that there will be further development on the Christchurch City Station site which is located in the High Density Residential Zone.</p> <p>It is also noted that Fire and Emergency are seeking the removal of 91 Chester Street from RHA 2. However, this portion of the site is zoned Medium Density Residential so any developments would not be subject to Rule 9.3.4.1.3 RD8 or this matter of discretion.</p>	Retain as notified.
21	Appendix 9.3.7.3 Schedule of Significant Historic Heritage Areas	Oppose	<p>Fire and Emergency oppose the inclusion of 91 Chester Street East as part of the RHA 2 as it imposes unnecessary restrictions on the site with regard to new buildings and alterations to existing buildings and introduces additional resource consent requirements. This will not only increase the cost to</p>	See relief sought in section 1.2.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			<p>Fire and Emergency but restrict the design and built form of their future district offices and resourcing garage.</p> <p>Therefore, it is sought the 91 Chester Street East is removed from RHA 2. It is further requested that Appendices 9.3.7.7.1, 9.3.7.8.1 and 9.3.7.9.1 are updated to reflect the removal of the site.</p>	
22	Appendix 9.3.7.7.1 – Proposed Plan Change 13 – Chester Street East / Dawson Street HA2	Oppose	<p>As abovementioned, it is sought that 91 Chester Street East is removed from Heritage area 2. Therefore, Appendix 9.3.7.7.1 would need to be updated accordingly.</p>	See relief sought in section 1.2.
Chapter 13: Specific Purpose Zone				
Sub-chapter 13.6 Specific Purpose (School) Zone				
23	13.6.4.2.7 – Water Supply for firefighting	Support	<p>Fire and Emergency support activities within the Specific Purpose (School) Zone being subject to 13.6.4.2.7.</p> <p>This is further supported by existing matter of discretion 13.6.5.3 Water supply for firefighting which requires consideration of whether sufficient firefighting water supply is available to ensure the safety of people and property in the zone, as well as neighbouring properties, in the event of fire.</p> <p>Fire and Emergency acknowledge that the requirement to limited notify the 'New Zealand Fire Service Commission' (now Fire and Emergency New Zealand) has been removed. Fire and Emergency recognise that this does not remove the requirement to comply with the performance standard and therefore is not opposed to the removal of 13.6.4.2.7.</p>	Retain as notified.
Chapter 14: Residential				
Sub-Chapter 14.4 – 14.3 – Introduction / Objectives and Policies				
24	14.2.3.8 Policy – Fire fighting water capacity	Support	<p>Fire and Emergency supports policy 14.2.3.8 that requires residential developments to have sufficient water supply for firefighting purposes to ensure the health and safety of people and communities.</p>	Retain as notified.
25	New policy	New		Add new policy:

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			Fire and Emergency seeks new policies in relation to the development in medium density residential zone, high density residential zone and the future urban zone. These zones will enable extensive new development around existing fire stations. Fire and Emergency are seeking that the policies recognise the existing potential effects from an emergency service facility and that their effects are not considered to constitute an adverse effect where subsequent housing intensification has occurred on neighbouring sites.	14.2.6.3 Policy – Reverse Sensitivity a. Within Medium Density Residential areas: i. enable the ongoing operation, use and redevelopment of existing emergency service facilities.
26	New policy	New	This could be achieved by a no complaints covenant on the neighbouring titles or a performance standard which the permitted activities need to be subject to.	Add new policy: 14.2.7.7 Policy – Reverse sensitivity a. Within High Density Residential areas: i. enable the ongoing operation, use and redevelopment of existing emergency service facilities.
27	New policy	New		Add new policy: 14.2.8.8 Policy – Reverse sensitivity a. Within Future Urban areas: i. enable the ongoing operation, use and redevelopment of existing emergency service facilities.
Sub-chapter 14.4 – Rules – Residential Suburban and Residential Suburban Density Transition Zone				
28	14.4.2.3 Building height	Support in part	Fire stations are typically single storied buildings of approximately 8-9m in height, and emergency service towers and communication poles can be around 12 to 15 metres in height. The emergency service towers, and communication poles serve several purposes being for hose drying, communications and training purposes on station. The need for emergency service towers and communication poles required at stations is dependent on locational and operational requirements of each station. Fire and Emergency is seeking an exemption for emergency service towers and communication poles in order to appropriately provide for the health and safety of the community by enabling the efficient	Amend as follows: 14.4.2.3 Building height a. The maximum height of any building shall be: ... Advice note: 1. See the permitted height exceptions contained within the definition of height 2. Emergency service facilities, emergency service towers and communication poles are exempt from this rule.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			<p>functioning of Fire and Emergency in establishing and operating fire stations and associated structures.</p> <p>This exemption could either be provided under the permitted height exemptions contained within the definition or a further advice note.</p>	
Sub-chapter 14.5 – Rules – Medium Density Residential Zone				
29	14.5.1.3 Restricted discretionary activity RD21	Support in part	<p>Fire and Emergency support the permitted activities listed in Rule 14.5.1.1 being subject to performance standard 14.5.2.14 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary activity status and the supporting matter of discretion 14.15.3.8 that requires consideration of whether sufficient firefighting water supply is available to ensure the health and safety of the community, including neighbouring properties.</p> <p>Fire and Emergency however note an error in the numbering in 14.5.1.3 RD21 and request that this be amended as per the relief sought.</p>	<p>Amend 14.5.1.3 RD21 as follows:</p> <ol style="list-style-type: none"> a. Residential units that do not meet Rule 14.5.2.14 – Water supply for fire fighting. b. Any application arising from this rule shall not be publicly notified <p>Council’s discretion is limited to:</p> <ol style="list-style-type: none"> a. Water supply for fire fighting – Rule 14.15.78
30	14.5.2.3 Building height and maximum number of storeys	Support in part	<p>Fire stations are typically single storied buildings of approximately 8-9m in height, and emergency service towers and communication poles can be around 12 to 15 metres in height. The emergency service towers and communication poles serve several purposes being for hose drying, communications and training purposes on station. The need for emergency service towers and communication poles required at stations is dependent on locational and operational requirements of each station.</p> <p>Fire and Emergency is seeking an exemption for emergency service facilities, emergency service towers and communication poles in order to appropriately provide for the health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations and associated structures.</p>	<p>Amend as follows:</p> <p>14.5.2.3 Building height and maximum number of storeys</p> <p>...</p> <p><u>Advice note:</u></p> <ol style="list-style-type: none"> 1. See the permitted height exceptions contained within the definition of height 2. <u>Emergency service facilities, emergency service towers and communication poles are exempt from this rule.</u>

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			This exemption could either be provided under the permitted height exemptions contained within the definition or an advice note.	
31	14.5.2.7 - Minimum building setbacks	Oppose	<p>As set out in section 1.3.4 of this submission, Fire and Emergency have concerns around the increased risk of fire spreading as a result of reduced boundary setbacks. Reduced setbacks can inhibit Fire and Emergency personnel from getting to the fire source or other emergency. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area.</p> <p>Fire and Emergency acknowledge that firefighting access requirements and building setback controls are managed through the New Zealand Building Code (NZBC) however consider it important that these controls are brought to the attention of plan users (i.e. developers) early on in the resource consent process so that they can incorporate the NZBC requirements early on in their building design. Fire and Emergency therefore request that, as a minimum, an advice note is included with built form standard 14.5.2.7 directing plan users to the requirements of the NZBC.</p>	<p>Amend as follows:</p> <p><i><u>Advice note:</u></i> <i><u>Building setback requirements are further controlled by the Building Code. This includes the provision for firefighter access to buildings and egress from buildings. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</u></i></p>
32	14.5.2.14 – Water supply for fire fighting	Support	Fire and Emergency support the introduction of 14.5.2.14(b) into the built form standard for firefighting water supply as it requires non-reticulated water supply to be compliant with the alternative firefighting water sources provisions of SNZ PAS 4509:2008.	Retain as notified.
Sub-chapter 14.6 – Rules – High Density Residential Chapter				
33	14.6.1.3. Restricted Discretionary activity RD1	Support	<p>Fire and Emergency support the permitted activities list in Rule 14.6.1.1 being subject to performance standard 14.6.2.13 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 14.15.8 that requires consideration of whether sufficient</p>	<p>14.6.1.3. Restricted Discretionary activity RD1</p> <p>a. Any cultural activity at 52 Rolleston Avenue (Lot 2 DP 496200), that does not meet one or more of the built form standards in Rule 14.6.2.</p>

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			<p>firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided. Fire and Emergency however note an error in the numbering in 14.6.1.3 RD1 and request this be amended as per the relief sought.</p>	<p>b. Any application arising from Rule 14.6.2.1213 shall not be publicly notified.</p>
34	<p>14.6.1.3. Restricted Discretionary activity RD4</p>	Support in part	<p>Fire and Emergency support the permitted activities list in Rule 14.6.1.1 being subject to performance standard 14.6.2.13 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 14.15.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided.</p> <p>Fire and Emergency however note an error in the numbering in 14.6.1.6 RD4 and request this be amended as per the relief sought.</p>	<p>Amend as follows:</p> <ol style="list-style-type: none"> a. Any new building, or alteration or addition to an existing building for a retirement village that meet the following built form standards: <ol style="list-style-type: none"> i. Rule 14.6.2.1 Building height ii. Rule 14.6.2.2 Height in relation to boundary iii. Rule 14.6.2.43 Setbacks iv. Rule 14.6.2.13 Water supply for firefighting b. Any application arising from this rule shall not be limited or publicly notified. <p>Council's discretion shall be limited to the following matters: Retirement villages – Rule 14.15.10</p>
35	<p>14.6.1.3. Restricted Discretionary activity RD5</p>	Support in part	<p>Fire and Emergency support the permitted activities list in Rule 14.6.1.1 being subject to performance standard 14.6.2.13 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 14.15.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided. Fire and Emergency however note an error in the numbering in 14.6.1.3 RD5 and request this be amended as per the relief sought.</p>	<p>Amend as follows:</p> <ol style="list-style-type: none"> a. Any new building, or alteration or addition to an existing building for a retirement village that does not meet one or more of the following built form standards: <ol style="list-style-type: none"> i. 14.6.2.1 Building height ii. Rule 14.6.2.2 Height in relation to boundary iii. Rule 14.6.2.43 Setbacks iv. Rule 14.6.2.13 Water supply for firefighting b. Any application arising from Rule 14.6.2.3 shall not be limited or publicly notified. c. Any application arising from Rule 14.6.2.123 shall not be publicly notified and shall be

ID	Proposed provision	Support /Oppose	Submission	Requested relief
36	14.6.2.1 Building height	Support in part	<p>Fire stations are typically single storied buildings of approximately 8-9m in height, and emergency service towers and communication poles can be around 12 to 15 metres in height. The emergency service towers and communication poles serve several purposes being for hose drying, communications and training purposes on station. The need for emergency service towers and communication poles required at stations is dependent on locational and operational requirements of each station.</p> <p>Fire and Emergency is seeking an exemption for emergency service facilities, emergency service towers and communication poles in order to appropriately provide for the health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations and associated structures.</p> <p>This exemption could either be provided under the permitted height exemptions contained within the definition or an advice note.</p>	<p>limited notified only to Fire and Emergency New Zealand (absent its written approval).</p> <p>Amend as follows:</p> <p>Advice note:</p> <ol style="list-style-type: none"> 1. See the permitted height exceptions contained within the definition of height 2. <u>Emergency service facilities, emergency service towers and communication poles are exempt from this rule.</u>
37	14.6.2.3 – Setbacks	Oppose in part	<p>As set out in section 1.3.4 of this submission, Fire and Emergency have concerns around the increased risk of fire spreading as a result of reduced boundary setbacks. Reduced setbacks can inhibit Fire and Emergency personnel from getting to the fire source or other emergency. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area.</p> <p>Fire and Emergency acknowledge that firefighting access requirements and building setback controls are managed through the New Zealand Building Code (NZBC) however consider it important that these controls are brought to the attention of plan users (i.e. developers) early on in the resource consent process so that they can incorporate the</p>	<p>Amend as follows:</p> <p>Advice note:</p> <p><u>Building setback requirements are further controlled by the Building Code. This includes the provision for firefighter access to buildings and egress from buildings. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</u></p>

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			NZBC requirements early on in their building design. Fire and Emergency therefore request that, as a minimum, an advice note is included with built form standard 14.6.2.3 directing plan users to the requirements of the NZBC.	
38	14.6.2.13 - Water supply for firefighting	Support	Fire and Emergency support the introduction of 14.6.2.13(b) into the built form standard for firefighting water supply as it requires non-reticulated water supply to be provided in accordance with SNZ PAS 4509:2008.	Retain as notified.
Sub-chapter 14.7 – Rules - Residential Hills Zone				
39	14.7.1.3 Restricted discretionary activities RD18	Support in part	<p>Fire and Emergency support the permitted activities list in Rule 14.7.1.1 being subject to performance standard 14.7.2.11 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 14.15.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided.</p> <p>Fire and Emergency however note an error in the numbering in 14.7.1.3 RD18 and request this be amended as per the relief sought.</p>	<p>Amend as follows:</p> <p>Council's discretion shall be limited to the following matter:</p> <p>a. Water supply for fire fighting – Rule 14.15.78</p>
Sub-chapter 14.8 – Rules – Residential Banks Peninsula Zone				
40	14.8.1.3 Restricted discretionary RD9	Support in part	<p>Fire and Emergency support the permitted activities list in Rule 14.8.1.3 being subject to performance standard 14.8.2.7 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 14.15.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided.</p>	<p>Amend as follows:</p> <p>Council's discretion shall be limited to the following matter:</p> <p>a. Water supply for fire fighting – Rule 14.15.78</p>

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			Fire and Emergency however note an error in the numbering in 14.8.1.3 RD9 and request this be amended as per the relief sought	
Sub-chapter 14.9 – Rules – Residential Large Lot Zone				
41	14.9.1.3. Restricted discretionary activities RD15	Support in part	<p>Fire and Emergency support the permitted activities list is 14.9.1.1 being subject to performance standard 14.9.2.8 that requires a water supply for firefighting. Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 14.15.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided.</p> <p>Fire and Emergency however note an error in the numbering in 14.9.1.3 RD15 and request this be amended as per the relief sought.</p>	<p>Amend as follows: Council's discretion is restricted to:</p> <ol style="list-style-type: none"> a. Water supply for fire fighting – Rule 14.15.78
42	14.9.2.5 Minimum building setbacks from internal boundaries	Oppose in part	<p>As set out in section 1.3.4 of this submission, Fire and Emergency have concerns around the increased risk of fire spreading as a result of reduced boundary setbacks. Reduced setbacks can inhibit Fire and Emergency personnel from getting to the fire source or other emergency. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area.</p> <p>Fire and Emergency acknowledge that firefighting access requirements and building setback controls are managed through the New Zealand Building Code (NZBC) however consider it important that these controls are brought to the attention of plan users (i.e. developers) early on in the resource consent process so that they can incorporate the NZBC requirements early on in their building design. Fire and Emergency therefore request that, as a minimum, an advice note is included with built form standard 14.9.2.5 directing plan users to the requirements of the NZBC.</p>	<p>Amend as follows:</p> <p><i><u>Advice note:</u></i> <i><u>Building setback requirements are further controlled by the Building Code. This includes the provision for firefighter access to buildings and egress from buildings. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</u></i></p>

ID	Proposed provision	Support /Oppose	Submission	Requested relief
Sub-chapter 14.12 Rules – Future Urban Zone				
43	14.12.2.1 Building height	Oppose in part	<p>Fire stations are typically single storied buildings of approximately 8-9m in height, and emergency service towers and communication poles can be around 12 to 15 metres in height. The emergency service towers, and communication poles serve several purposes being for hose drying, communications and training purposes on station. The need for emergency service towers and communication poles required at stations is dependent on locational and operational requirements of each station.</p> <p>Fire and Emergency is seeking an exemption for emergency service facilities, emergency service towers and communication poles in order to appropriately provide for the health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations and associated structures.</p> <p>This exemption could either be provided under the permitted height exemptions contained within the definition or an advice note.</p>	<p>Amend as follows:</p> <p><u>Advice note:</u></p> <ol style="list-style-type: none"> 1. See the permitted height exceptions contained within the definition of height 2. <u>Emergency service facilities, emergency service towers and communication poles are exempt from this rule.</u>
44	14.12.2.5 Minimum building setbacks from internal boundaries and railway lines	Oppose in part	<p>As set out in section 1.3.4 of this submission, Fire and Emergency have concerns around the increased risk of fire spreading as a result of reduced boundary setbacks. Reduced setbacks can inhibit Fire and Emergency personnel from getting to the fire source or other emergency. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area.</p> <p>Fire and Emergency acknowledge that firefighting access requirements and building setback controls are managed through the New Zealand Building Code (NZBC) however consider it important that these controls are brought to the attention of plan users (i.e. developers) early on in the resource consent process so that they can incorporate the NZBC requirements early on in their building design.</p>	<p>Amend as follows:</p> <ol style="list-style-type: none"> a. The minimum building setback from internal boundaries shall be as follows: e. b. For a retirement village or a comprehensive residential development, this rule applies only to the internal boundaries on the perimeter of the entire development. d. c. For the purposes of this rule, this excludes guttering up to 200mm in width from the wall of a building. <p><u>Advice note:</u></p> <p><u>Building setback requirements are further controlled by the Building Code. This includes the provision for firefighter access to buildings and egress from</u></p>

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			<p>Fire and Emergency therefore request that, as a minimum, an advice note is included with built form standard 14.12.2.5 directing plan users to the requirements of the NZBC.</p> <p>For clarity, Fire and Emergency request that the clauses are updated to be in sequential order.</p>	<p><i><u>buildings. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</u></i></p>
Sub-chapter 14.15 Rules – Matters of control and discretion				
45	14.15.1 - Residential design principles	Support in part	Fire and Emergency seeks reference to emergency access on site.	<p>Amend as follows:</p> <p>...</p> <p>g. Access, parking and servicing</p> <p>i. Whether the development provides for good, safe access and integration of space for pedestrian movement, cyclist servicing, and parking (where provided).</p> <p>ii. The relevant considerations are the extent to which the development:</p> <p>A. integrates access in a way that is safe for all users, and offers direct and convenient access for pedestrians and cyclists from the street to the front door of each unit;</p> <p>B. provides effective physical separation between vehicles and any dedicated pedestrian access;</p> <p>C. when parking areas and garages are provided, these are designed and located in a way that does not dominate the development, particularly when viewed from the street or other public open spaces;</p> <p>D. when no on-site car parking is provided, the movement of people and car-free modes of travel are facilitated, including accesses that are of sufficient width and standard of formation to be used by people with differing mobility needs; and</p>

ID	Proposed provision	Support /Oppose	Submission	Requested relief
				<p>E. provides for suitable storage (including bike storage) and service spaces which are conveniently accessible for people with differing mobility needs, safe and/or secure, and located and/or designed to minimise adverse effects on occupants, neighbours and public spaces.</p> <p>iii. <u>Whether the development provides for appropriate emergency access on/to the site:</u></p> <p><u>A. The extent to which access to the on-site alternative firefighting water supply complies with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.</u></p> <p><u>B. The extent to which developments provide for emergency service access including pedestrian accessways that are clear, unobstructed and well lit</u></p> <p><u>C. The extent to which wayfinding for different properties on a development are clear in day and night is provided.</u></p>
46	14.15.3 Impacts on neighbouring property	Support in part	<p>Fire and Emergency note the importance to maintain firefighting water supply pressure throughout high rise buildings. Fire and Emergency seek that Council consider this as a matter of discretion when compliance is not achieved.</p> <p>Fire and Emergency are concerned by the risk of fire spreading due to setbacks from boundaries. It can inhibit Fire and Emergency personnel from getting to the fire source.</p> <p>Fire and Emergency seek that Council consider this as an additional matter of discretion as outlined in the relief sought.</p>	<p>Amend as follows:</p> <p>...</p> <p><u>viii. Fire risk mitigation incorporated to avoid horizontal spread of fire across boundaries; and</u></p> <p><u>ix. Provision of suitable firefighting water supply and pressure.</u></p>
47	14.15.8 - Water supply for fire fighting	Support	Fire and Emergency support the matter of discretion 14.15.8 that requires consideration of whether sufficient firefighting water supply to ensure the	Retain as notified.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			health and safety of the community, including neighbouring properties is provided.	
48	14.15.27 Character Area Overlay	Oppose in part	<p>Fire and Emergency are seeking the removal of 91 Chester Street East from the RHA 2 to enable development within the site without potential functional, time and cost constraints. This will enable Fire and Emergency to carry out their duty to provide for the health and safety of people and communities in Christchurch.</p> <p>For clarity however, Fire and Emergency seeks that the clauses are appropriately updated to be in sequential order where a clause has been removed or added.</p>	See sought relief in section 1.2.
Chapter 15 – Commercial				
49	15.2.4 Objective - Urban form, scale and design outcomes	Support	Fire and Emergency support the urban form, scale and design outcomes objective as 15.2.4. (a) ii. recognises the functional and operational requirements of activities and the anticipated built form. As Emergency service facilities are permitted within this zone, it is considered that the functional and operational requirements of Fire and Emergency are anticipated in this zone.	Retain as notified.
15.4 Rules – Town Centre Zone				
50	15.4.2.2 Maximum building height	Support	Fire stations are typically single storied buildings of approximately 8-9m in height, and emergency service towers and communication poles can be around 12 to 15 metres in height. The emergency service towers, and communication poles serve several purposes being for hose drying, communications and training purposes on station. The need for emergency service towers and communication poles required at stations is dependent on locational and operational requirements of each station.	Retain as notified.
51	15.4.2.8 - Water supply for fire fighting	Support	Fire and Emergency support the introduction of 15.4.2.8(b) into the built form standard for firefighting water supply as it requires non-reticulated water	Retain as notified.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			supply to be compliant with the alternative firefighting water sources provisions of SNZ PAS 4509:2008.	
15.5 Rules – Local Centre Zone				
52	15.5.2.2 - Maximum building height	Support in part.	<p>Fire stations are typically single storied buildings of approximately 8-9m in height, and emergency service towers and communication poles can be around 12 to 15 metres in height. The emergency service towers, and communication poles serve several purposes being for hose drying, communications and training purposes on station. The need for emergency service towers and communication poles required at stations is dependent on locational and operational requirements of each station.</p> <p>Fire and Emergency is seeking an exemption for emergency service facilities, emergency service towers and communication poles in order to appropriately provide for the health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations and associated structures.</p> <p>This exemption could either be provided under the permitted height exemptions contained within the definition or an advice note.</p>	<p>Amend as follows:</p> <p><u>Advice note:</u></p> <ol style="list-style-type: none"> <u>See the permitted height exceptions contained within the definition of height</u> <u>Emergency service facilities, emergency service towers and communication poles are exempt from this rule.</u>
53	15.5.2.8 - Water supply for fire fighting	Support	Fire and Emergency support the inclusion of the built form standard 15.5.2.8(b) which requires non-reticulated water supply for firefighting be provided in accordance with SNZ PAS 4509:2008.	Retain as notified.
15.6 Rules – Neighbourhood Centre Zone				
54	15.6.2.1 - Maximum building height	Support in part	<p>Fire stations are typically single storied buildings of approximately 8-9m in height, and emergency service towers and communication poles can be around 12 to 15 metres in height. The emergency service towers, and communication poles serve several purposes being for hose drying, communications and training purposes on station. The need for emergency service towers and</p>	<p>Amend as follows:</p> <p><u>Advice note:</u></p> <ol style="list-style-type: none"> <u>See the permitted height exceptions contained within the definition of height</u> <u>Emergency service facilities, emergency service towers and communication poles are exempt from this rule.</u>

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			<p>communication poles required at stations is dependent on locational and operational requirements of each station.</p> <p>Fire and Emergency is seeking an exemption for emergency service facilities, emergency service towers and communication poles in order to appropriately provide for the health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations and associated structures.</p> <p>This exemption could either be provided under the permitted height exemptions contained within the definition or an advice note.</p>	
55	15.6.2.7 - Water supply for fire fighting	Support	Fire and Emergency support the inclusion of built form standard 15.6.2.7(b) which requires non-reticulated water supply for firefighting be provided in accordance with SNZ PAS 4509:2008.	Retain as notified.
15.7 Rules – Commercial Banks Peninsula Zone				
56	15.7.2.4 - Minimum building setback from the boundary with a Residential Zone	Support	Fire and Emergency support the minimum setbacks from the boundary specified in Rule 15.7.2.4(a) as they may enable Fire and Emergency personnel to get to the fire source and reduce the risk of fire spread.	Retain as notified.
57	15.7.2.7 - Water supply for fire fighting	Support	Fire and Emergency support the inclusion of built form standard 15.7.2.7(b) which requires non-reticulated water supply for firefighting be provided in accordance with SNZ PAS 4509:2008.	Retain as notified.
15.8 Rules – Large Format Retail Zone				
58	15.8.1.3 Restricted discretionary activities RD1	Support	<p>Fire and Emergency support the permitted activities list is Rule 15.8.1.1 being subject to performance standard 15.8.2.7 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 15.14.3.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and</p>	Retain as notified.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			safety of the community, including neighbouring properties is provided.	
59	15.8.2.7 Water supply for fire fighting	Support in part	<p>Fire and Emergency supports the inclusion of built form standard 15.8.2.7(b) which requires water supply for firefighting be provided in accordance with SNZ PAS 4509:2008.</p> <p>Fire and Emergency seek that 'New Zealand Fire Service Commission' is amended to 'Fire and Emergency New Zealand'.</p>	<p>Amend as follows:</p> <p>c. Any application arising from this rule shall not be publicly notified and shall be limited notified only to New Zealand Fire Service Commission Fire and Emergency New Zealand (absent its written approval).</p>
15.9 Rules – Commercial Office Zone				
60	15.9.1.3 Restricted discretionary activities RD1	Support	<p>Fire and Emergency support the permitted activities list is Rule 15.9.1.1 being subject to performance standard 15.9.2.7 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 15.14.3.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided.</p>	Retain as notified.
15.10 Rules – Mixed Use Zone				
61	15.10.1.3 Restricted discretionary activities RD1	Support	<p>Fire and Emergency support the permitted activities list is Rule 15.10.1.1 being subject to performance standard 15.10.2.7 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 15.14.3.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided.</p>	Retain as notified.
62	15.10.2.1 Maximum building height	Support	Fire stations are typically single storied buildings of approximately 8-9m in height, and emergency service towers and communication poles can be around 12 to 15 metres in height. The emergency	Retain as notified.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			service towers, and communication poles serve several purposes being for hose drying, communications and training purposes on station. The need for emergency service towers and communication poles required at stations is dependent on locational and operational requirements of each station.	
63	15.10.2.3 - Minimum building setback from residential zones and internal boundaries	Support	Fire and Emergency support the minimum setbacks from the boundary specified in Rule 15.10.2.3(a) as they may enable Fire and Emergency personnel to get to the fire source and reduce the risk of fire spread.	Retain as notified.
64	15.10.2.7 - Water supply for fire fighting	Support	Fire and Emergency support the inclusion of Rule 15.10.2.7(b) which requires non-reticulated water supply for firefighting be provided in accordance with SNZ PAS 4509:2008.	Retain as notified.
65	15.10.2.9 - Minimum standards for Comprehensive Residential Development	Support in part	Fire and Emergency seeks reference to emergency access on site to the extent that it requires either a combined vehicle-pedestrian access or a dedicated pedestrian access with associated minimum standards. Fire and Emergency request that these minimum standards be amended to provide for emergency responder access for reasons set out in Section 1.3.1 above.	Amend as follows: <ul style="list-style-type: none"> a. All shared pedestrian access ways within and through a site shall: <ul style="list-style-type: none"> i. have a minimum width of <ul style="list-style-type: none"> A. 3 metres on a straight accessway including-excluding planting. B. 6.2 metres on a curved or cornered accessway C. 4.5m space to position the ladder and perform operational tasks. ii. The width for pedestrian access shall be clear of any fencing, storage or servicing, except security gates, where necessary. iii. provide wayfinding for different properties on a development are clear in day and night.

15.11 Rules – City Centre Zone

ID	Proposed provision	Support /Oppose	Submission	Requested relief
66	15.11.1.3. Restricted discretionary activity RD5	Support	<p>Fire and Emergency support the permitted activities list in Rule 15.11.1.1 being subject to performance standard 15.11.2.13 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 15.14.3.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided.</p>	Retain as notified.
67	15.11.2.13 - Water supply for fire fighting	Support in part	<p>Fire and Emergency support the addition of 15.11.2.13(b) which requires non-reticulated water supply for firefighting be provided in accordance with SNZ PAS 4509:2008.</p> <p>A minor amendment is sought to 15.11.2.13(c) to update reference from 'New Zealand Fire Service Commission' to 'Fire and Emergency New Zealand'.</p>	<p>Amend as follows:</p> <p>c. Any application arising from this rule shall not be publicly notified. Limited notification, if required, shall only be to Fire and Emergency New Zealand the New Zealand Fire Service Commission (absent its written approval).</p>
15.12 Rules – Central City Mixed Use Zone				
68	15.12.1.3 Restricted discretionary activities RD2	Support	<p>Fire and Emergency support the permitted activities listed in Rule 15.12.1.1 being subject to performance standard 15.12.2.8 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary activity status and the supporting matter of discretion 15.14.3.8 that requires consideration of whether sufficient firefighting water supply is available to ensure the health and safety of the community, including neighbouring properties.</p>	Retain as notified.
69	15.12.2.7 - Minimum setback from the boundary with a residential zone or from an internal boundary	Support	<p>Fire and Emergency support the minimum setbacks from the boundary specified in Rule 15.12.2.7(a) as they may enable Fire and Emergency personnel to get to the fire source and reduce the risk of fire spread.</p>	Retain as notified.
70	15.12.2.8 Water supply for fire fighting	Support in part	<p>Fire and Emergency support the addition of Rule 15.12.2.8(b) which requires non-reticulated water</p>	Amend as follows:

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			<p>supply for firefighting beprovided in accordance with SNZ PAS 4509:2008.</p> <p>A minor amendment is sought to 15.12.2.8(c) to update reference from New Zealand Fire Service Commission to 'Fire and Emergency New Zealand'.</p>	<p>..;</p> <p>Any application arising from this rule shall not be publicly notified and shall be limited notified only to New Zealand Fire Service Commission Fire and Emergency New Zealand (absent its written approval).</p>
15.13 Rules – Central City Mixed Use Zone (South Frame)				
71	15.13.1.3 Restricted discretionary activities RD5	Support	<p>Fire and Emergency support the permitted activities listed in 15.13.1 being subject to performance standard 15.13.2.9 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary activity status and the supporting matter of discretion 15.14.3.8 that requires consideration of whether sufficient firefighting water supply is available to ensure the health and safety of the community, including neighbouring properties.</p>	Retain as notified.
72	15.13.2.9 - Water supply for fire fighting	Support in part	<p>Fire and Emergency support the addition of 15.13.2.9(b) which ensures that non-reticulated water supply for firefighting is provided in accordance with SNZ PAS 4509:2008.</p> <p>A minor amendment is sought to 15.13.2.9(c) to update reference from New Zealand Fire Service Commission to 'Fire and Emergency New Zealand'.</p>	<p>Amend as follows:</p> <p>...</p> <p>Any application arising from this rule shall not be publicly notified and shall be limited notified only to New Zealand Fire Service Commission Fire and Emergency New Zealand (absent its written approval).</p>

Please click on the link below to view the document

http://makeasubmissionadmin.ccc.govt.nz/Manage/Docs/PID_294/294_15823TQN60A_Fire and Emergency New Zealand - Small Fiona - Small Fiona - Plan Change 14 to Christchurch Plan Submission - FENZ.PDF

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Allan **Last name:** Taunt

On behalf of:

Preferred method of contact: Email

Postal address: 92 Regency Crescent

Christchurch

Suburb:

City:

Country: New Zealand

Postcode: 8051

Email: allan.taunt@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:

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

Allan

Robson, Gina

From: Generation Zero <noreply@123formbuilder.com>
Sent: Friday, 12 May 2023 9:43 pm
To: Engagement
Subject: CCC District Plan Changes (PC14) - Generation Zero Quick Submit / 531

This is a submission on the proposed Christchurch District Plan changes via the Generation Zero quick submission form. The feedback below is on PC14.

Form Summary

1. First / Last name	Allan Taunt
2. Email address	allan.taunt@hotmail.com
3. Postal Address	92 Regency Crescent Christchurch 8051
4. Trade competition/adverse effects:	Option 1: I could not gain in trade competition through this submission
5. Answer if you selected option 2 above:	Are you directly affected by a possible effect of this plan change in a way that it: a. adversely affects the environment, and b. does not relate to the trade competition or the effects of trade competitions
Chapter 6 - Tree Canopy Cover and Financial Contributions	<p>The council will require 20% of new residential developments to be covered by trees, or otherwise pay a financial contribution to help the council plant more trees on public land. Christchurch has an appallingly low tree canopy cover rate of 13% compared to Auckland (18%) and Wellington (30%). Trees have a wide range of environmental, health, social and economic benefits and are important for the future of our city.</p> <p>I support the Tree Canopy Cover rules and Financial Contributions to restore our tree canopy. Trees are important in reducing emissions,</p>

Form Summary

providing shade and temperature control in the summer, alongside the other wide range of economic, health and social effects. I seek that the council retains the tree canopy requirement and contributions plan.

Chapter 14 - Low Public Transport Accessibility Area Qualifying Matter

The council plans to restrict housing in some areas of the city because they are poorly serviced by the lack of current high frequency public transport routes. Some areas solely designated with this qualifying matter such as in Casebrook and Styx are close to rail corridors, existing commercial areas and are serviced by low frequency routes. In the future, these areas could see a boost in service by more buses on current routes or introduction of a commuter rail service.

I oppose the Low Public Transport Accessibility Area Qualifying Matter as I believe that the public transport layout and network will need changes to prepare and accommodate future growth. We should not define future growth in Christchurch based on these routes. This would also artificially limit future housing in our city. I seek that the council drop this qualifying matter.

Chapter 14 - Sunlight Access Qualifying Matter

There are many cities in the world that have high density and are further from the equator than Christchurch. Cities such as Vienna, Copenhagen, Toronto, Geneva, and Calgary are consistently ranked some of the most livable cities in the world. This qualifying matter would reduce the maximum height and size of medium residential buildings below what is legally required. This qualifying matter has been developed with the expressed purpose of protecting and increasing property values rather than increasing the amount of affordable housing for people.

I oppose the Sunlight Access Qualifying Matter. There are many cities in the Northern Hemisphere that are further away from the equator and have a higher level of housing intensification than Christchurch. With a mix of medium and high density housing, these cities are considered some of the most livable cities in the world. This qualifying matter would restrict medium density housing height and size in such a way that would create a less efficient usage of land and limit future housing. I seek that the council drop this qualifying matter.

Chapter 14 - High-Density Residential Zone

The council is required by law to allow residential buildings of at least 6 storeys within a 1.2km radius of commercial centres such as malls and the city centre. The council plan to enable this, while also allowing up to 10 storeys for residential buildings closer to the city centre. This would enable a wider range of dense housing development options. It would also allow more people to live close to services and amenities.

I support high-density housing near the city and commercial centres. We need to allow more people to live near services and amenities to reduce car dependency. This would allow more people to take active and public transport to commute, shop and play. I seek that the council enable 6 to 10 storeys for residential buildings near commercial centres.

Form Summary**Any other comments?**

The message has been sent from 122.61.175.144 nz at 2023-05-12 on iPhone unknown

Entry ID: 204

Referrer: <http://m.facebook.com/>

Form Host: <https://form.123formbuilder.com/6423130/ccc-district-plan-changes-pc14-generation-zero>

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Hayden **Last name:** Smythe

On behalf of:

Preferred method of contact: Email

Postal address: 1a James Condon Place

Suburb:

City:

Country: New Zealand

Postcode: 8051

Email: mcqgj47b@duck.com

Daytime Phone:

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 Gain an advantage in trade competition through this submission

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 directly affected by an effect of the subject matter of the submission that :
 a. adversely affects the environment, and
 b. does not relate to the trade competition or the effects of trade competitions.

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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

Hayden

Robson, Gina

From: Generation Zero <noreply@123formbuilder.com>
Sent: Friday, 12 May 2023 7:03 pm
To: Engagement
Subject: CCC District Plan Changes (PC14) - Generation Zero Quick Submit / 531

This is a submission on the proposed Christchurch District Plan changes via the Generation Zero quick submission form. The feedback below is on PC14.

Form Summary

1. First / Last name	Hayden Smythe
2. Email address	mcqgj47b@duck.com
3. Postal Address	1a James Condon Place Redwood Christchurch 8051
4. Trade competition/adverse effects:	Option 1: I could not gain in trade competition through this submission
5. Answer if you selected option 2 above:	Are you directly affected by a possible effect of this plan change in a way that it: a. adversely affects the environment, and b. does not relate to the trade competition or the effects of trade competitions
Chapter 6 - Tree Canopy Cover and Financial Contributions	<p>The council will require 20% of new residential developments to be covered by trees, or otherwise pay a financial contribution to help the council plant more trees on public land. Christchurch has an appallingly low tree canopy cover rate of 13% compared to Auckland (18%) and Wellington (30%). Trees have a wide range of environmental, health, social and economic benefits and are important for the future of our city.</p> <p>I support the Tree Canopy Cover rules and Financial Contributions to restore our tree canopy. Trees are important in reducing emissions,</p>

Form Summary

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Chapter 14 - Low Public Transport Accessibility Area Qualifying Matter

The council plans to restrict housing in some areas of the city because they are poorly serviced by the lack of current high frequency public transport routes. Some areas solely designated with this qualifying matter such as in Casebrook and Styx are close to rail corridors, existing commercial areas and are serviced by low frequency routes. In the future, these areas could see a boost in service by more buses on current routes or introduction of a commuter rail service.

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The council is required by law to allow residential buildings of at least 6 storeys within a 1.2km radius of commercial centres such as malls and the city centre. The council plan to enable this, while also allowing up to 10 storeys for residential buildings closer to the city centre. This would enable a wider range of dense housing development options. It would also allow more people to live close to services and amenities.

I support high-density housing near the city and commercial centres. We need to allow more people to live near services and amenities to reduce car dependency. This would allow more people to take active and public transport to commute, shop and play. I seek that the council enable 6 to 10 storeys for residential buildings near commercial centres.

Form Summary**Any other comments?**

The message has been sent from 119.224.85.210 nz at 2023-05-12 on Chrome 112.0.5615.135

Entry ID: 201

Referrer: <https://www.generationzero.org/>

Form Host: <https://form.123formbuilder.com/6423130/ccc-district-plan-changes-pc14-generation-zero>

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 03/05/2023

First name: Christopher **Last name:** Evan

On behalf of:

Preferred method of contact: Email

Postal address:

Suburb:

City:

Country: New Zealand

Postcode:

Email: chrisandjoie@cje.co.nz

Daytime Phone: 0274350323

I could not
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I am not
 directly affected by an effect of the subject matter of the submission that :

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- b. does not relate to the trade competition or the effects of trade competitions.

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Would you like to present your submission in person at a hearing?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Consultation Document Submissions

Chapter 6 General Rules and Procedures **Points:** 45.1

- Support
- Oppose
- Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area

My submission is that

I suggest Christchurch City Council accepts the new Government rules and laws -6.1A.

Chapter 14 Residential **Points:** 45.2

- 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

I suggest Christchurch City Council accepts the new Government rules and laws-14.5/14.6.

Attached Documents

File

No records to display.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Lauren **Last name:** Bonner

On behalf of:

Preferred method of contact Email

Postal address: 52 Dover Street

Suburb:

City:

Country: New Zealand

Postcode: 8014

Email: yellow.squizzel@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.

Attached Documents

File
Lauren

Robson, Gina

From: Generation Zero <noreply@123formbuilder.com>
Sent: Friday, 12 May 2023 5:34 pm
To: Engagement
Subject: CCC District Plan Changes (PC14) - Generation Zero Quick Submit / 531

This is a submission on the proposed Christchurch District Plan changes via the Generation Zero quick submission form. The feedback below is on PC14.

Form Summary

1. First / Last name	Lauren Bonner
2. Email address	yellow.squizzel@gmail.com
3. Postal Address	52 Dover Street St Albans Christchurch 8014
4. Trade competition/adverse effects:	Option 1: I could not gain in trade competition through this submission
5. Answer if you selected option 2 above:	Are you directly affected by a possible effect of this plan change in a way that it: a. adversely affects the environment, and b. does not relate to the trade competition or the effects of trade competitions
Chapter 6 - Tree Canopy Cover and Financial Contributions	<p>The council will require 20% of new residential developments to be covered by trees, or otherwise pay a financial contribution to help the council plant more trees on public land. Christchurch has an appallingly low tree canopy cover rate of 13% compared to Auckland (18%) and Wellington (30%). Trees have a wide range of environmental, health, social and economic benefits and are important for the future of our city.</p> <p>I support the Tree Canopy Cover rules and Financial Contributions to restore our tree canopy. Trees are important in reducing emissions,</p>

Form Summary

providing shade and temperature control in the summer, alongside the other wide range of economic, health and social effects. I seek that the council retains the tree canopy requirement and contributions plan.

Chapter 14 - Low Public Transport Accessibility Area Qualifying Matter

The council plans to restrict housing in some areas of the city because they are poorly serviced by the lack of current high frequency public transport routes. Some areas solely designated with this qualifying matter such as in Casebrook and Styx are close to rail corridors, existing commercial areas and are serviced by low frequency routes. In the future, these areas could see a boost in service by more buses on current routes or introduction of a commuter rail service.

I oppose the Low Public Transport Accessibility Area Qualifying Matter as I believe that the public transport layout and network will need changes to prepare and accommodate future growth. We should not define future growth in Christchurch based on these routes. This would also artificially limit future housing in our city. I seek that the council drop this qualifying matter.

Chapter 14 - Sunlight Access Qualifying Matter

There are many cities in the world that have high density and are further from the equator than Christchurch. Cities such as Vienna, Copenhagen, Toronto, Geneva, and Calgary are consistently ranked some of the most livable cities in the world. This qualifying matter would reduce the maximum height and size of medium residential buildings below what is legally required. This qualifying matter has been developed with the expressed purpose of protecting and increasing property values rather than increasing the amount of affordable housing for people.

I oppose the Sunlight Access Qualifying Matter. There are many cities in the Northern Hemisphere that are further away from the equator and have a higher level of housing intensification than Christchurch. With a mix of medium and high density housing, these cities are considered some of the most livable cities in the world. This qualifying matter would restrict medium density housing height and size in such a way that would create a less efficient usage of land and limit future housing. I seek that the council drop this qualifying matter.

Chapter 14 - High-Density Residential Zone

The council is required by law to allow residential buildings of at least 6 storeys within a 1.2km radius of commercial centres such as malls and the city centre. The council plan to enable this, while also allowing up to 10 storeys for residential buildings closer to the city centre. This would enable a wider range of dense housing development options. It would also allow more people to live close to services and amenities.

I support high-density housing near the city and commercial centres. We need to allow more people to live near services and amenities to reduce car dependency. This would allow more people to take active and public transport to commute, shop and play. I seek that the council enable 6 to 10 storeys for residential buildings near commercial centres.

Form Summary**Any other comments?**

Build for the future Christchurch, duh.

The message has been sent from 125.238.247.79 nz at 2023-05-12 on Chrome 113.0.0.0

Entry ID: 200

Referrer: <https://www.reddit.com/>

Form Host: <https://form.123formbuilder.com/6423130/ccc-district-plan-changes-pc14-generation-zero>

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Will **Last name:** Struthers

On behalf of:

Preferred method of contact: Email

Postal address: 11 Barnes Road

Suburb:

City:

Country: New Zealand

Postcode: 8051

Email: will.struthers92@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.

Attached Documents

File

Will

Robson, Gina

From: Generation Zero <noreply@123formbuilder.com>
Sent: Friday, 12 May 2023 2:24 pm
To: Engagement
Subject: CCC District Plan Changes (PC14) - Generation Zero Quick Submit / 531

This is a submission on the proposed Christchurch District Plan changes via the Generation Zero quick submission form. The feedback below is on PC14.

Form Summary

1. First / Last name	Will Struthers
2. Email address	will.struthers92@gmail.com
3. Postal Address	11 Barnes Road Redwood Christchurch 8051
4. Trade competition/adverse effects:	Option 1: I could not gain in trade competition through this submission
5. Answer if you selected option 2 above:	Are you directly affected by a possible effect of this plan change in a way that it: a. adversely affects the environment, and b. does not relate to the trade competition or the effects of trade competitions Option 2: No
Chapter 6 - Tree Canopy Cover and Financial Contributions	The council will require 20% of new residential developments to be covered by trees, or otherwise pay a financial contribution to help the council plant more trees on public land. Christchurch has an appallingly low tree canopy cover rate of 13% compared to Auckland (18%) and Wellington (30%). Trees have a wide range of

Form Summary

environmental, health, social and economic benefits and are important for the future of our city.

I support the Tree Canopy Cover rules and Financial Contributions to restore our tree canopy. Trees are important in reducing emissions, providing shade and temperature control in the summer, alongside the other wide range of economic, health and social effects. I seek that the council retains the tree canopy requirement and contributions plan.

Chapter 14 - Low Public Transport Accessibility Area Qualifying Matter

The council plans to restrict housing in some areas of the city because they are poorly serviced by the lack of current high frequency public transport routes. Some areas solely designated with this qualifying matter such as in Casebrook and Styx are close to rail corridors, existing commercial areas and are serviced by low frequency routes. In the future, these areas could see a boost in service by more buses on current routes or introduction of a commuter rail service.

I oppose the Low Public Transport Accessibility Area Qualifying Matter as I believe that the public transport layout and network will need changes to prepare and accommodate future growth. We should not define future growth in Christchurch based on these routes. This would also artificially limit future housing in our city. I seek that the council drop this qualifying matter.

Chapter 14 - Sunlight Access Qualifying Matter

There are many cities in the world that have high density and are further from the equator than Christchurch. Cities such as Vienna, Copenhagen, Toronto, Geneva, and Calgary are consistently ranked some of the most livable cities in the world. This qualifying matter would reduce the maximum height and size of medium residential buildings below what is legally required. This qualifying matter has been developed with the expressed purpose of protecting and increasing property values rather than increasing the amount of affordable housing for people.

I oppose the Sunlight Access Qualifying Matter. There are many cities in the Northern Hemisphere that are further away from the equator and have a higher level of housing intensification than Christchurch. With a mix of medium and high density housing, these cities are considered some of the most livable cities in the world. This qualifying matter would restrict medium density housing height and size in such a way that would create a less efficient usage of land and limit future housing. I seek that the council drop this qualifying matter.

Chapter 14 - High-Density Residential Zone

The council is required by law to allow residential buildings of at least 6 storeys within a 1.2km radius of commercial centres such as malls and the city centre. The council plan to enable this, while also allowing up to 10 storeys for residential buildings closer to the city centre. This would enable a wider range of dense housing development options. It would also allow more people to live close to services and amenities.

Form Summary

I support high-density housing near the city and commercial centres. We need to allow more people to live near services and amenities to reduce car dependency. This would allow more people to take active and public transport to commute, shop and play. I seek that the council enable 6 to 10 storeys for residential buildings near commercial centres.

Any other comments?

The message has been sent from 210.55.227.167 nz at 2023-05-12 on Chrome 112.0.0.0

Entry ID: 199

Referrer: <https://l.facebook.com/>

Form Host: <https://form.123formbuilder.com/6423130/ccc-district-plan-changes-pc14-generation-zero>

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Richard **Last name:** Pebbles

Organisation: Pebbles Group Limited

On behalf of:

Preferred method of contact Email

Postal address: PO Box 365

Suburb:

City:

Country: New Zealand

Postcode: 8013

Email: jeremy@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:

Attached Documents

File

PC14 submission Cranford St Pebbles Group Ltd

Form 5

**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR PLAN,
CHANGE OR VARIATION**

Clause 6 of Schedule 1, Resource Management Act 1991

To Christchurch City Council

Name of submitter: Peebles Group Limited (*Peebles Group*)

- 1 This is a submission on the proposed plan change 14 (*PC14*) to the Christchurch District Plan (the *District Plan*).
- 2 Peebles Group could not gain an advantage in trade competition through this submission.
- 3 Peebles Group's submission relates to the whole of *PC14*. However, the specific relief sought by Peebles Group is set out at **Appendix 1** and a summary of their key submission points follows.
- 4 In summary, Peebles Group has interests in the properties at 478-484 Cranford Street, Christchurch which is commonly known as the commercial centre 'Cranford Park'. Under *PC14*, this property is zoned *LCZ*, with property to the west and northeast zoned *IG* (with a brownfield overlay), and residential zoning (*MRZ*, *HRZ* and *FUZ*) to the northwest and on the opposite side of Cranford Street. To the east of the block is land zoned Rural Urban Fringe (*RuUF*) and the designated Northern Arterial corridor.
- 5 This submission seeks that the land to the east (at 468-470 Cranford Street) be rezoned *LCZ*, to provide for the more efficient and effective utilisation of the land resource, than would otherwise occur under *RuUF* zoning. *LCZ* would better enable the establishment of business activities in a manner consistent with the *NPS-UD* including those provisions concerning sufficient development capacity, accessibility, and well functioning urban environments.
- 6 Given the context described above, the *RuUF* zoning of the land is ineffective, inefficient and inappropriate. Conversely, *LCZ* zoning is the most appropriate zoning for the land, accounting for the provisions in the *NPS-UD*, including policies 1, 2, 3 and 4.



Figure 1 – subject land



Figure 2 – PC14 proposed zoning of subject land

- 7 Accounting for the above, Peebles Group consider that a LCZ zoning is appropriate for the properties at 468-470 Cranford Street and the planning maps should be amended accordingly.
- 8 The submitter seeks the following decision from the local authority:
 - 8.1 The relief as set out in **Annexure A**.
 - 8.2 Any other similar relief that would address the relief sought by the submitter.
 - 8.3 All necessary consequential amendments.
- 9 Peebles Group wishes to be heard in support of the submission.
- 10 If others make a similar submission, Peebles Group will consider presenting a joint case with them at a hearing.


Signed for and on behalf of Peebles Group Limited:



pp. R Peebles
12 May 2023

Address for service of submitter:

Peebles Group Limited
c/- Novo Group Limited (Attn: J Phillips)
PO Box 365
Christchurch 8013
Email address: jeremy@novogroup.co.nz

No.	Provision	Position	Submission	Relief Sought
Planning maps				
1.	Planning maps	Oppose in part	For the reasons expressed in the submission above, the submitter considers the properties at 468-470 Cranford Street should be rezoned LCZ, accounting for the attributes of the land/locality and in order to meet the requirements of the NPS-UD.	<p>Amend the planning maps to rezone the properties at 468-470 Cranford Street as LCZ, as indicated below.</p> 

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: John **Last name:** Lourie

Organisation: Entropy MMX Limited

On behalf of:

Preferred method of contact Email

Postal address: PO Box 365

Suburb:

City:

Country: New Zealand

Postcode: 8013

Email: jeremy@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:

Attached Documents

File

PC14 submission Winters Road Entropy

Form 5

**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR PLAN,
CHANGE OR VARIATION**

Clause 6 of Schedule 1, Resource Management Act 1991

To Christchurch City Council

Name of submitter: Entropy MMX Limited (*Entropy*)

- 1 This is a submission on the proposed plan change 14 (*PC14*) to the Christchurch District Plan (the *District Plan*).
- 2 Entropy could not gain an advantage in trade competition through this submission.
- 3 Entropy's submission relates to the whole of PC14. However, the specific relief sought by Entropy is set out at **Appendix 1** and a summary of their key submission points follows.
- 4 In summary, Entropy has interests in the properties at 142A Winters Road, Christchurch. This site is residual land from the adjacent Northern Motorway Corridor project by NZTA/Waka Kotahi, with the designation for that infrastructure adjoining the land to the north, west and south.
- 5 Under PC14, this property is zoned Rural Urban Fringe (RuUF). It is surrounded by designated State Highway, with the exception of other RuUF land to the east.
- 6 This submission seeks that 142-144 Winters Road be rezoned for urban purposes, to provide for the more efficient and effective utilisation of the land resource, than would otherwise occur under RuUF zoning. Accounting for the zoning of land in the surrounding area, IG, MRZ, or RS zoning is sought on the basis that this would better enable the establishment of business or residential activities in a manner consistent with the NPS-UD including those provisions concerning sufficient development capacity, accessibility, and well functioning urban environments.



Figure 1 – subject land



Figure 2 – PC14 proposed zoning of subject land

- 7 Accounting for the above, Entropy consider that a IG, MRZ, or RS zoning is appropriate for the properties at 142-144 Winters Road, Christchurch and the planning maps should be amended accordingly.
- 8 The submitter seeks the following decision from the local authority:
 - 8.1 The relief as set out in **Annexure A**.
 - 8.2 Any other similar relief that would address the relief sought by the submitter.
 - 8.3 All necessary consequential amendments.
- 9 Entropy wishes to be heard in support of the submission.
- 10 If others make a similar submission, Entropy will consider presenting a joint case with them at a hearing.

Signed for and on behalf of Entropy MMX Limited:




pp. J Lourie
12 May 2023

Address for service of submitter:

Address for service of submitter:

Entropy MMX Limited
c/- Novo Group Limited (Attn: J Phillips)
PO Box 365
Christchurch 8013
Email address: jeremy@novogroup.co.nz

No.	Provision	Position	Submission	Relief Sought
Planning maps				
1.	Planning maps	Oppose in part	For the reasons expressed in the submission above, the submitter considers the properties at 142-144 Winters Road should be rezoned IG, MRZ, or RS, accounting for the attributes of the land/locality and in order to meet the requirements of the NPS-UD.	<p>Amend the planning maps to rezone the properties at 142-144 Winters Road as IG, MRZ, or RS, as indicated below.</p> 

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 17/05/2023

First name: Hamish **Last name:** Wright

Organisation: Crichton Development Group

Limited

On behalf of:

Preferred method of contact

Postal address: PO Box 365

Suburb:

City:

Country: New Zealand

Postcode: 8013

Daytime Phone:

I could not

Gain an advantage in trade competition through this submission

I am not

directly affected by an effect of the subject matter of the submission that :

a. adversely affects the environment, and

b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Attached Documents

File

PC14 submission Crichton Dvlpt Group Ltd

Form 5

**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR PLAN,
CHANGE OR VARIATION**

Clause 6 of Schedule 1, Resource Management Act 1991

To Christchurch City Council

Name of submitter: Crichton Development Group Limited (*Crichton*)

- 1 This is a submission on the proposed plan change 14 (*PC14*) to the Christchurch District Plan (the *District Plan*).
- 2 Crichton could not gain an advantage in trade competition through this submission.
- 3 Crichton's submission relates to the whole of PC14. However, the specific relief sought by Crichton is set out at **Appendix 1** and a summary of their key submission points follows.
- 4 In summary, Crichton has interests in the properties at 15-19 John Paterson Drive, in Halswell. These properties and those extending along the northern side of John Paterson Drive (inclusive of 5-19 John Paterson Drive and 451 Halswell Junction Road) form an enclave of land that includes and directly adjoins the Christchurch Southern Motorway and is bounded to the northwest and southeast by urban land. John Paterson Drive is a formed urban-standard road and the properties serviced by this road are not presently used for productive rural purposes.



- 5 Given this context, the evident demand and inadequate supply for greenfield residential land in Christchurch city and the absence of any evident significant rural values in this location (notwithstanding versatile soils), Crichton consider that the land is most appropriately rezoned to a Medium Density Residential Zone (MRZ). Such zoning would be consistent and compatible with adjacent zoning to the southeast and would provide additional and necessary household capacity in accordance with the requirements of the NPS-UD.
- 6 Crichton's submission primarily concerns the land to the north of John Paterson Drive, but it is acknowledged that rezoning of land to the south and south as MRZ may also be necessary and appropriate for the same reasons expressed above.
- 7 Accounting for the above, Crichton consider that a Medium Density Residential zoning is appropriate for the properties at 5-19 John Paterson Drive and 451 Halswell Junction Road and the planning maps should be amended accordingly.
- 8 The submitter seeks the following decision from the local authority:
 - 8.1 The relief as set out in **Annexure A**.
 - 8.2 Any other similar relief that would address the relief sought by the submitter.
 - 8.3 All necessary consequential amendments.
- 9 Crichton wishes to be heard in support of the submission.
- 10 If others make a similar submission, Crichton will consider presenting a joint case with them at a hearing.

Signed for and on behalf of Crichton Development Group Limited by



pp. H Wright
12 May 2023

Address for service of submitter:

Crichton Development Group Limited
c/- Novo Group Limited
Attention: J Phillips
PO Box 365
Christchurch 8013
Email: jeremy@novogroup.co.nz

No.	Provision	Position	Submission	Relief Sought
Planning maps				
1.	Planning maps	Oppose in part	<p>For the reasons expressed in the submission above, the submitter considers the properties at 5-19 John Paterson Drive and 451 Halswell Junction Road should be rezoned MRZ, accounting for the attributes of the land/locality and in order to meet the requirements of the NPS-UD.</p>	<p>Amend the planning maps to rezone the properties at 5-19 John Paterson Drive and 451 Halswell Junction Road as MRZ, as indicated below.</p> 