

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

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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

Letter-from-Mayor-Lianne-Dalziel-to-Hon-David-Parker-Minister-for-the-Environment-re-Proposed-Plan-Change-14-Housing-and-Business-Choice-2022-09-20(1)

GrePartridgearticle1March23

File
Bespoke Plan Proposal 20220921
What are the negative impacts of high rise
SOCIAL-PROBLEMS-IN-HIGH-RISE-LIVING-IN-JOHOR-BAHRU
challenges to mental health in high rise -10-00034-v2
Riccarton Bush Precinct Streetscapes
Riccarton Bush Precinct Homes
RBI_Kauri_ClusterTrees_Streetscape_Green_views
RBI_Kauri_Cluster_Streetscapes
Time running out to save ChristchurchTrees_TinaLaw
Success story_singapore
_a greener graden city_Will Harvie
Urban Tree Cover
Urban greening can reduce impact of global heating in cities
Historic earthquakes
Greeninfrastructure
Global Warming Has Concrete Problem When It Comes to CO2
EarthquakeHistoryurls
AlivinghellTelevisionApril 162021
Re Affordability
Christchurch most affordable story
2018 to 2022 Multi-Unit Developments in Christchurch EXECUTIVE SUMMARY
Moonee Valley Neighbourhood Character Study 2012 I - Chap3_AppendixAold
Moonee Valley Neighbourhood Character Study 2012 I - Chap3_AppendixA
230508_5381_PC14 Riccarton Bush - Kilmarnock_Landscape memorandum
RLB FOR THE CHRISTCHURCH DISTRICT PLAN INDEPENDENT HEARINGS PANEL
PCL4coversheetRLBroughton
MY_proposed_PC14changes_RLBroughton

20 September 2022

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Tēnā koe Minister

### Christchurch City Council - Proposed Plan Change 14 Housing and Business Choice

As you are aware, our Council declined to notify the proposed plan change to give effect to the NPS-UD and the new provisions of the RMA to enable housing supply for Tier 1 councils.

You may not be aware that the Council authorised staff to undertake pre-notification engagement, which resulted in extensive feedback being received from a wide range of community groups. There was support for intensification to address both housing supply and affordability issues, however there were serious concerns raised about the impact of the one-size-fits-all intensification approach.

As a Council, we have asked Ministers and officials to take our unique circumstances into account from the outset of the NPS-UD process. This legislation has never made sense for Ōtautahi Christchurch in the context of the extensive post-earthquake land-use changes that were made to the Christchurch District Plan. Unfortunately, these changes took effect after the initial report you relied on in your First Reading speech on the RMA Amendment Bill last year. I covered this, and many other critical issues, in my oral submission, which I have attached to this letter.

Our environment and our planning arrangements are quite different to both Auckland and Wellington. With our neighbours to the north and south, we stretch into the Canterbury Plains. We are much flatter than our counterparts in the north, and we don't have the valleys and gullies which naturally inhibit development elsewhere. This means the impact of the housing intensification provisions is significantly greater when it comes to tree canopy and liveability.

Through our existing planning arrangements, which include the Greater Christchurch Partnership and now the Whakawhanake Kāinga Committee (Urban Growth Partnership with central government), we are already seeking to address housing affordability and availability – without exacerbating urban sprawl – by (under our current District Plan) enabling intensification in areas where it makes sense i.e. focussing on centres and key public transport routes.

I am aware that the Council is now technically in breach of our statutory obligations and that there are powers available to Ministers to intervene. I am asking Ministers not to do so.

Instead, I am calling on you to work alongside the Council to find a bespoke solution for Ōtautahi Christchurch that meets the Government's objectives whilst promoting a sustainable urban form that protects our tree canopy and enhances the liveability of our city. It is what our residents want, and it is in the best interests of the city that we do. In fact, it will enable the development of a well-functioning urban environment, as anticipated by the NPS-UD.

Given that voting for local body elections closes on 8 October, I hope that you agree it would be most appropriate to allow the new Council time to investigate a solution once governance arrangements are in place.

In the meantime, Council staff are ready and willing to work alongside your officials in more detailed discussions about possible options, until the new Council is in a position to engage.

I have attached more detailed information which supports the position set out in this letter. I have also attached a letter from Professor Peter Skelton, former Judge of the Environment Court and former Canterbury Regional Council Commissioner, who has very kindly written to me in support of the Council position on this matter.

I would greatly appreciate a response from you on the approach we are recommending before Thursday 29 September, so that I can report this to my colleagues before the Council breaks up for the election period.

While I won't be on the new Council, I fervently hope that the new Council and the Government can collaborate on finding a solution that is tailored to the special circumstances of Ōtautahi Christchurch.

Ngā mihi



Lianne Dalziel  
**Mayor of Christchurch**

cc Hon Nanaia Mahuta  
Hon Dr Megan Woods  
Hon Phil Twyford

## Attachment 1: Detailed request from Christchurch City Council to Ministers

### Introduction

1. On Tuesday, 13 September 2022, the Christchurch City Council chose not to approve a staff recommendation to notify Plan Change 14 (PC14), which was intended to give effect to the National Policy Statement on Urban Development 2020 (NPS-UD) and the 2021 amendments to the Resource Management Act 1991 (RMA).
2. The Council resolved (in part) to:  
*“Request the Minister work with us in partnership given our unique situation that means we have sufficient capacity of land in the short, medium, and long term available for housing given our extensive land use planning changes to increase density and intensification post-earthquake, and look at land use planning that addresses the issues of housing affordability and sustainable development.”*

### **As a Council, our key concern is that the legislation and process do not take into account the unique situation in Ōtautahi Christchurch**

3. Our Council has stated repeatedly in engagement, submissions, and presentations to select committees and communication with ministers that the Council has strong concerns with the legislation and process undertaken to get to this point. While the Council recognises the need for intensification in appropriate areas to ensure housing affordability and sustainable development, the one-size-fits-all approach in the legislation fails take into account the relevant local context and what is appropriate to achieve a well-functioning urban environment.
4. One of the key drivers of the legislation is to ensure that land supply for housing is sufficient both in the short term and the longer term; however, unlike other Tier 1 centres, Ōtautahi is in the unique situation of having sufficient land capacity for housing in the short, medium, and long term. This is detailed in the evaluation assessment for the proposed plan change 14. This is due to both extensive long-term partnership over many years by the Greater Christchurch Partnership, and the result of the recovery plans, regeneration plans and bespoke Independent Hearings Panel process for the Christchurch District Plan. These endeavours have provided for extensive land use planning changes in the post-earthquake environment, which has enabled Ōtautahi to provide for housing supply and intensification more thoroughly than other centres already – in this respect, we are ahead of the game.
5. We have repeatedly expressed our concern that the statutory obligation to implement medium density residential standards (MDRS) has the effect of reducing the potential uptake of development opportunities in areas of the city that are highly accessible by walking, cycling and public transport to employment, services and amenities. The vast scope of MDRS results in an urban form that is expansive in all directions - that is not appropriate for Ōtautahi. Our level of accessibility ranks poorly compared to other centres because growth here is unconstrained by bays, gullies, and other landforms that direct and limit growth opportunities for other larger Tier 1 councils.
6. Enabling medium density through the MDRS in these poorly accessible areas of Ōtautahi fails to align with areas of employment, local services, public transport corridors, and fails to deliver a low-carbon future. Whilst parking spaces cannot be mandated through the District Plan, the market (and indeed lenders) will be forced to provide parking due to the lack of alternative transport options and the dislocation from employment and services.
7. We want to make it clear that, other than the introduction of MDRS, we are generally supportive of the direction of the NPS-UD. As previously indicated, we support changes that seek to intensify within and around centres. In order to meet all of our objectives, intensification must be enabled in a more focussed way in

Ōtautahi. This would best contribute to increased efficiencies in land use and infrastructure for the city; support the viability of multi-modal transport systems, and contribute to a reduction in greenhouse gas emissions and the broader affordability goals desired in Ōtautahi.

8. Our Council truly believes that bespoke provision for Ōtautahi's implementation of the NPS-UD would better provide us with the opportunity to provide for a low-carbon, accessible form of residential living. In order to help us achieve other government priorities, we hope that you agree.

### **Request to work in partnership to achieve an appropriate outcome for Ōtautahi Christchurch**

9. Despite the concerns expressed with the legislation and process, the Council agrees with the Government's objective of improved intensification, particularly to ensure housing affordability and sustainable development. Liveability is an important part of that.
10. The Council would progress in partnership with Government to find a solution to land use planning that addresses the issues of housing affordability and sustainable development, specifically tailored to the our context. We seek an approach that enables the specific issues relating to land use planning in Ōtautahi to be addressed, as opposed to the one-size-fits-all approach.
11. We consider it is in the best interests of the Council and the Government to achieve an urban form outcome for Ōtautahi that appropriately reflects our unique situation and that has regard to the extensive land use planning changes to enable increased density in a post-earthquake environment.
12. As you know, the Council is working in partnership with other local councils, central government and mana whenua through the Urban Growth Partnership for Greater Christchurch – the Whakawhanake Kāinga Committee – to develop a spatial plan which sets the direction for the future urban form for our city and surrounding towns. Integral to this work is the consideration of enhanced public transport provision, particularly investigation of mass rapid transit.
13. At the Whakawhanake Kāinga Committee briefing 12 August 2022, members were supportive of urban form direction to inform the development of the draft spatial plan. This included focusing growth on 'higher densities around centres and major transport routes / MRT across all Greater Christchurch centres'. This urban form direction is consistent with our view of the type of intensification which will best deliver a well-functioning urban form for Greater Christchurch that can reduce private car dependency, provide affordable, quality housing and support economic prosperity.

21 September, 2022

Lianne Dalziel  
Mayor of Christchurch

Cc Dawn Baxendale, CEO, Christchurch City Council  
Christchurch City Councillors

Dear Madam Mayor,

**YOUR APPEAL TO THE CROWN ASKING FOR A BESPOKE HOUSING PLAN FOR ŌTAUTAHI**

As you know a number of residents groups have been active recently (since the Sept 13th NO vote) encouraging the government to delay making any hasty decisions while we provide evidence of the level of intensification we need to meet the agreed objectives.

The 21 groups named below ask you to please represent our thinking when considering what the bespoke plan might look like. We note you have already written to the Minister asking if we can be a special case.

Informing our request is the knowledge that the proposed unplanned level of intensification enabled in PC14 is unnecessary and potentially damaging. Even with recently announced (and long overdue) government policy to protect rural land, you know we still have more than enough housing development capacity in Christchurch for the foreseeable future.

We ask for the following:

- 1) The rules related to setbacks and recession planes (governing shading) should be immediately returned to CCC control, in recognition of the fact that 'one size fits all' across the motu is inequitable, and our current operative plan rules are acceptable.
- 2) The extent to which medium density should apply should be limited to areas identified for medium density growth in our operative District Plan, rather than city-wide.
- 3) The extent to which higher density residential standards should apply outside the CBD should be determined after CCC has
  - a) re-evaluated the extent to which they are required to meet housing demand and environmental policy objectives.
  - b) consulted further with affected communities and has taken the views of those communities into account.
  - c) re-evaluated and tested assumptions, such as
    - i) the boundaries for city, town and neighbourhood centre areas.
    - ii) for each centre walking precinct, the actual ideal average-speed walking times (not distances) from key locations in the centres, such as supermarkets and transport hubs.
  - d) identified necessary infrastructure and services needed to support higher densities.
  - e) put in place policies, rules or incentives to ensure the core CBD is intensified first, particularly those areas where there is vacant or poorly-utilised land.

- 4) Compulsory minimum building quality and design standards are needed. Kainga Ora standards might be a starting point.
- 5) All standards should include an acknowledgement of the importance of amenity, social and community cohesion, and wellbeing; consistent with Sections 5 and 7 of the RMA. The NPS-UD appears to conflict with the Act in this respect.
- 6) All Qualifying Matters as proposed, and subsequently amended, must remain in place.

These requests might best be met by redesignating our city a Tier 2 City. In years to come, if circumstances dictate, we can always be made Tier 1. It simply doesn't work the other way around.

Thank you

1. Addington Neighbourhood Association
2. Burwood East Residents Association
3. Central Riccarton Residents' Association
4. Charleston Neighbourhood Association
5. Christchurch Civic Trust
6. Dallington Residents' Association
7. Englefield Residents' Association
8. Halswell Residents' Association
9. Hospitality NZ Canterbury
10. Greater Hornby Residents' Association
11. Ilam and Upper Riccarton Residents' Association
12. Inner City West Neighbourhood Association (ICON)
13. Lower Cashmere Residents' Association
14. Northwood Residents' Association
15. Riccarton Bush-Kilmarnock Residents' Association
16. Riccarton Bush Trust
17. St Albans Residents' Association
18. Somerfield Residents' Association
19. Spreydon Neighbourhood Network
20. Victoria Neighbourhood Association
21. Westmorland Residents' Association





## SOCIAL PROBLEMS IN HIGH-RISE LIVING IN JOHOR BAHRU

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### ABSTRACT

Housing is the basic needs for human being. Living in high-rise properties has increasingly become an accepted reality of the today's society particularly in urban country such as Hong Kong, Singapore and Malaysia. However, high-rise living causes the numbers of social problems such as suicide, social isolation, increasing in crimes, feeling of anxiety and depression and so forth. Hence, this study aims to ascertain the social problems in high-rise living and determine the factors that contribute to the social problems in high-rise living. A Likert-scale questionnaire survey is used to achieve both objectives. The data is analysed by using frequency analysis and mean scores. The findings of the results show that the main social problems in high-rise living is social isolation while the main factors contribute to the social problems is Airbnb factor and lack of communication with neighbours. This study suggested that similar research should be undertaken for different type of accommodation as social problems occur not only for high-rise living residents only.

## 1.0 INTRODUCTION

For thousands of years, people built their houses on ground with only one to two floors height. They never built an underground or high-rise dwelling as both structures will contribute dread feeling and unpleasant living condition for them.

However, more and more high-rise residential buildings are being erected in all continents in the world. This is due to the world today is facing escalating rates of urbanisation and is expected to increase significantly in near future, especially in Asia, Africa and Latin America. Although there is a negative growth rate in some cities of the Europe, the overall population still increase gradually. Same situation persists in the Australia and Canada (Al-Kodmany, 2011). Thus, the overpopulation threat is impending over the entire world.

As stated in the World Urbanization Prospects 2014, the urban population is expected to be 66% in 2050, which was 30% in 1950s. It is promising to say that 2.5 billion people will be added to the urban population by 2050 by looking at the increment percentage in the urban population. Because of the population growths, high-rise residential buildings are resorted to cater for the increased dwelling demand. In highly developed countries like UK, Japan and Singapore, high-rise living can be considered as the most common living style for most of the people due to the high population and scarcity of developable land in urban areas.

There are several studies stated that the key reasons for emergence of the high-rise residential in a large number is due to the in-migration of the people to the urban areas, increased land value, scarcity of land in urban areas and massive

housing shortage (Mir *et al.*, 2012; Arslan and Sev, 2014; Eichner and Ivanova, 2018).

## 2.0 PROBLEM STATEMENT

As in many other Asian countries, Malaysia also facing a rapid urban growth in recent years. The rate of urbanisation in Malaysia increased from 25% in 1960 to 75% in 2017 and is expected to surpass 80% by 2020. The construction of high-rise development in Malaysia is obvious, especially due to scarcity of land in the urban state such as in Kuala Lumpur, Penang, Selangor and Johor.

However, high-rise living has causing many unpleasant outcomes such as suicide. Jumping from high-rise buildings becoming very common method of suicide (Johari *et al.*, 2017; Lester, 1994).

Several studies and reviews concluded that high-rises are not favourable for residents. This is due to social problems arise from the high-rise living which are fear, suicide, dissatisfaction, behaviour problems, stress, poor social relations, delayed child development and reduced helpfulness (Angrist, 1974; Cappon, 1972; Conway and Adams, 1977).

Hence, the research questions for this study are:

- a) What are the social problems in high-rise living?
- b) What are the factors that contribute to the social problems in high-rise living?

The objectives of the research are set as below:

- a) To ascertain the social problems in high-rise living,
- b) To determine the factors that contribute to the social problems in high-rise living.

## 3.0 LITERATURE REVIEW

High-rise building will always be associated with social problems. This section will be looking at the overview of high-rise building and the social problems that has been associated with this kind of living.

### 3.1 High-Rise Building

A very basic definition of high-rise building is a tall modern building with many floors. The differentiate of high-rise buildings from conventional low-rise is high-rise buildings need special engineering systems due to their heights (Scott, 1998). However, there is no specific height stated in the several studies.

There are different approaches to determining the number of floors of high-rise buildings in different countries. As stated in Russian building codes, it can be categorised as high-rise buildings if the buildings are rising from 75 meters to 120-150 meters, with the number of floors not exceeding 30. High-rise buildings also can be identified as buildings having six (6) stories or more (Ministry of Housing and Urban Development). Urban planners often identify buildings with ten or more stories as tall buildings. Some researcher stated that the minimum stories of a high-rise building must be at least eight (8) storey high, although this number can be increased to 12, given the advance in facilities Shakeri *et al.* (2010).

From urban studies perspective, the main problem regarding the definition of high-rise buildings is that this definition is not adequately flexible. This is because there is relative concept for "tall buildings", not only to its heights, but other things should be considered as well. Hence, definition of tall buildings with respect to urban problems can be combined of both qualitative and quantitative variables. For instance, the meaning of tall buildings in some parts of the UK are based on the height, their effect on the surrounding environment or major impact on the skyline. If a building has one of these conditions, it considered as a high-rise building. Thus, a building with a middle height can be considered as a high-rise building on condition that it has impact to the skyline or the surrounding environment (Karimi and Adibi, 2010).

On the other hand, Davis and Everest *et al.* (2002) states that it is not possible to give the definition of tall buildings by using absolute measures. It is believed that "tall buildings are best understood in relative terms as buildings whose planning, design, construction and occupation is influenced by height in ways that

are not normally associated with more typical, local developments.”

### 3.2 Social Problem

Although a huge amount of papers was written regarding social problem, yet there is no universal definition about social problem. However, the common definition of social problem is any condition or behaviour that has negative consequences for large numbers of people and that is generally recognized as a condition or behaviour that needs to be addressed (Peck and Dolch, 2001).

Mental health, insecurity, health problems, children development are among social problems being brought up in previous studies by various researchers (Williams & Braun, 2019; Fujiwara *et al.*, 2014; Gifford, 2007; Hummelsheim *et al.*, 2011).

Apart from that, studies also reveal that loneliness and social isolation becoming big issue for social problem (William and Braun, 2019). Hummelsheim *et al.* (2011) also discusses insecurity and living in fear as main issues in their research.

## 4.0 METHODOLOGY

This research was based on study area that has been identified. This section will discuss study area, surveys, data sampling, collection and lastly data analysis.

### 4.1 Study Area

This study has been focused in Johor Bahru area. Johor Bahru is the state capital of Johor, which are the most southern state in Peninsular Malaysia. It has grown to become the second most important economic conurbation in Malaysia overall. This area also is one of the urbanise cities with the most population in Johor due to the in-bound migration. The existing supply of high-rise buildings unit including condominiums and apartments is 51,921 units and 10,807 units are incoming supply which indicates a high number of units after Selangor and Kuala Lumpur (NAPIC, 2018).

### 4.2 The questionnaire surveys

Basically, there are two types of questions structure used in forming questionnaire survey to collect data which are closed-ended questions and open questions. For closed-ended questions structure, respondents only allowed to response based on pre-decided categories. Data that can be placed into a category is called nominal data can be restricted to as few as two options such as ‘yes’ or provide ordinal data (which can be ranked) to measure the strength of attitudes or emotions such as 1 represent strongly disagree and 5 represent strongly agree.

For this research, there are three sections in the questionnaire survey which was designed to meet the objectives of the study respectively. Section A is demographic information about respondents such as gender, age, stakeholder, education level, marital status, income and so on. Questions in Section B will cover the social problems in high-rise living whereas Section C will cover on the factors that contribute to the social problem in high-rise living. The questions used in this questionnaire survey are closed-ended questions. Five-point Likert scale also adopted in this questionnaire survey.

### 4.3 Data Sampling

For the purpose of this research, the snowball sampling method was chosen to be the main way of collecting and selecting respondents. This method is a non-random sampling method used when the desired sample characteristic is rare. First respondent will be taken from the relatives or friends who are fulfil the requirement such as a resident in the medium to high-end high-rise residential or the management body in the high-rise residential buildings and then ask him to recommend to other respondents who will fit the description of the sample needed. As this referral technique goes on, the sample size will be increased.

### 4.4 Data Analysis

Frequency analysis is a simple data analysis method which is used to determine the frequency or number of respondents for each replied question. It is also a technique that is used to

determine the frequency of certain answer chosen by respondents. For this research, most of the questions formed in this questionnaire survey in Section A are analysed by using this method.

Likert scale is a psychometric scale where questions based on this scale are normally used in a survey. It is one of the most widely used question types in a survey. It is used to measure a respondent's opinion or attitude towards a given subject. The Likert scale is a 5- or 7-point scale that offers a range of answer options, from one attitude to another, like "agree" to "disagree".

In this research, a Likert scale of 1 to 5 used in the questionnaire survey is in Section B and Section C to determine whether the respondents completely disagree, disagree, partially agree, agree or completely agree with the statement provided. The findings from the questionnaire are then analysed by using SPSS and Microsoft Excel.

## 5.0 RESULTS AND ANALYSIS

This section is about results and research analysis. The discussion will be based on respondents for this study. The analysis then will be discusses based on the research objectives for this study.

### 5.1 Profile of Respondents

Table 1 shows the demographic of the respondents. Out of the total 168 filtered respondents for this study. It can generally conclude that 85.7% of the respondents is residents, 54.2% out of the 144 residents is tenant, more than half of the respondents is male, 47% of them is Chinese, 39.3% of the respondents is in the age range between 26 to 39 years old.

Almost half of the respondents have the degree level (47.6%), more than half of them is married (54.2%) and have no child (50%), 32.7% of the respondents' income is RM3,000 and below and most of the them live in condominium (45.8%).

Table 1: Respondents Profile

Demographic Attributes	Characteristics	Frequency	Percentage (%)
Stakeholder	i. Management office	24	14.3
	ii. Resident	144	85.7
Gender	i. Male	86	51.2
	ii. Female	82	48.8
Race	i. Malay	37	22.0
	ii. Chinese	79	47.0
	iii. Indian	22	13.1
	iv. Others	30	17.9
Age	i. Below 25 years old	37	22.0
	ii. 26-39 years old	66	39.3
	iii. 40-59 years old	56	33.3
	iv. 60 years old and above	9	5.4
Types of ownership	i. Owner	66	45.8
	ii. Tenant	78	54.2
Education level	i. SPM and below	18	10.7
	ii. Diploma	30	17.9
	iii. Degree	80	47.6
	iv. Master	28	16.7
	v. PHD	12	7.1
Marital status	i. Single	91	54.2
	ii. Married	77	45.8
Number of children	i. 0	84	50.0
	ii. 1	29	17.3
	iii. 2	28	16.7
	iv. 3	18	10.7
	v. 4 and above	9	5.3
Income	i. RM3,000 and below	55	32.7
	ii. RM3,001-RM5,000	37	22.0
	iii. RM5,001-RM7,000	33	19.6
	iv. RM7,001-RM9,000	11	6.5
	v. RM9,001-RM11,000	20	11.9
	vi. RM11,001 and above	12	7.1
Types of high-rise buildings	i. Apartment	32	19.0
	ii. Condominium	77	45.8
	iii. Others	59	35.1

### 5.2 Analysis for First Objective

Table 2 shows the results of the Likert scale analysis that has been carried out on the first objective which is social problems in high-rise living.

From the analysis, the main social problems in high-rise living is social isolation as it obtains the highest mean score value which is 4.17. This is because most of the high-rise residents are lack of communication with their neighbours, accordingly towards the outsiders.

It is then followed by the feeling of insecurity as the mean score value obtained is 4.02, Most of the respondents feel insecurity living in high-rise is most probably because of there are huge number of people reside in the same residence, which means they need to share the dwellings especially the common facilities with the strangers.

Table 2: Mean Scores for Social Problems in High-Rise Living

Category	Social Problems in High-Rise Living	Mean Score
Completely Agree	Social Isolation	4.17
	Feeling of Insecurity	4.02
Agree	Living in Fear	3.75
	Health Problem	3.57
Partially Agree	Noise Problem	3.46
	Development of Children	3.30
Disagree	Behaviour Problem	3.07
	Mental Problem	2.98
Completely Disagree	Distance to Religious Centre	2.42

Respondents agree that living in fear as a social problem in high-rise living most probably because of high-rise living evokes unsettling fear such as residents could be trapped in a fire or fall or jump from the buildings. Besides, loop of dust and poor air flow in the high-rise residential affect the respiratory system of the residents (Arslan and Sev, 2014). It is then indicating the reason respondents agree health problem as one of the social problems in high-rise living.

The problems of noise and development of children are partially agreed by the respondents as the social problems in high-rise living. The noise can be come from the day-to-day living such as talking, carrying out household activities, walking and when there is a party while development of children such as dressing was slower if compared to the children in low-rise or landed residential.

On the other hand, social problems of behaviour problem and mental problem are in the category of disagree. The mean score obtained by the behaviour problem and mental problem is 3.07 and 2.98 respectively. Most of the respondents do not agree with the both social problems in high-rise living most probably because of they do not found much mental difficulties and significant behaviour problems among the residents.

For the problems of distance to religious centre, it is completely disagreed by the disagreed by the respondents as a social problem in the high-rise living as it has the lowest mean score value which is 2.42. This is most probably because of majority of respondents are willing to go to the religious centre no matter how far the

distance between the religious centre and dwelling places.

### 5.3 Analysis for Second Objective

Table 3 shows the results of the Likert scale analysis that has been carried out on the second objective which is factors that contribute to social problems in high-rise living.

Table 3: Factors Contribute to Social Problems in High-Rise Living

Category	Factors that Contribute to Social Problems in High-Rise Living	Mean Score
Completely Agree	Airbnb	4.23
	Lack of Communication with Neighbours	4.23
	Management Problem	4.07
Agree	Building Design	3.57
	Parental Problem	3.46
Partially Agree	Building Material	3.43
	Lack of Facilities Provided	3.20
Disagree	Lack of Facilities Provided	3.20
Completely Disagree	Acrophobia	2.52

From the analysis, it is found that factors of Air Bed & Breakfast (Airbnb) and lack of communication with neighbours are the main factors contributed to the social problems in high-rise living as both factors have the highest mean score which is 4.23. Most of the owners or investors in their dwellings use Airbnb to market their dwellings for short-term tourism by renting out their room or whole places (Oskam and Boswijk, 2016). Due to the feeling of insecurity or fear to communicate with the strangers as their neighbours that always been different. Most of the residents have fewer interactions with their neighbours and they tend to live in isolation. As a result, this had contributed to the social problem of social isolation.

It is then followed by the factor of management problem with the mean score value of 4.07. Most of them are not professional, lack of knowledge and experience in managing the residential building and the most importantly is too profit oriented (Tiun, 2009).

Building design factor is also one of the factors which agreed by most of the respondents as the factors that contribute to the social problems in high-rise living. The increasing height of the building cause large wind shadows and minimize the air flow which could affect the lightning in the high-rise, accordingly, impact the health of the residents (Arslan and Sev, 2014).

Moreover, factor of parental problem and building material are partially agreed by the respondents with the mean score value of 3.46 and 3.43 respectively. Parents need to have their children in their visual vicinity. Hence, children in high-rise buildings are more restricted access to open spaces (Gifford, 2007). Building material of the high-rise building also be a factor as the issues of water and airtightness of the material used are always neglected. This will cause cracks on the wall and help the growth of mould and fungus which could affect the health of the residents (Baxi *et al.*, 2016).

The factor of lack of facilities provided is fallen in the category of disagree with the mean score value of 3.20. Most of the respondents did not agree with this factor most probably because of the facilities provided in their high-rise buildings is enough for them.

The last factor that contributed to the social problems in high-rise living is acrophobia factor. This factor is completely not agreed by the respondents with the mean value of 2.52. This is because majority of the respondents do not suffer from acrophobia.

## 6.0 CONCLUSION

Overall, based on the findings in this study, the main social problems in high-rise living is social isolation and followed by the feeling of insecurity while the main factors contributed to social problems in high-rise living is Airbnb and lack of communication with neighbours and then followed by management problem. As more and more of the high-rise residential has been market using Airbnb for short-term stay, the increasing number of strangers has increasing the feeling of insecurity and fear of residents to communicate with the neighbours as their neighbours always been changed. This had led to the main social problem which is social isolation among the residents as they tend to live in isolation.

Social problems in high-rise living can become serious if the appropriate measures do not been taken up. This issue could cause many unpleasant outcomes for the residents and consequently affect the image and development of the country if the issue remains unchanged. Hence, the issue of social problem in high-rise living should be concerned by the relevant

authorities and the ways to overcome this issue should be done in the future study to change the scenario in the future. It is suggested that similar study should be carried out for different living style as social problems not only occur for high-rise living resident only.

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Review

# High-Rise Apartments and Urban Mental Health—Historical and Contemporary Views

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**Abstract:** High-rise apartment buildings have long been associated with the poor mental health of their residents. The aims of this paper are to examine whether this connection is necessarily so, by reviewing the evidence relating to the relationships between high-rise living and social wellbeing, occupant's stress levels, and the influence they have on mental health. From selected literature, psychological stress and poor mental health outcomes of the populations that live in high-rise apartments are indeed apparent, and this is particularly so for apartments in poor neighbourhoods. Yet many apartments in developed cities are in affluent areas (particularly those with views of green/blue space), where residences on higher floors are more expensive. Either way, high-rise living and mental health outcomes are a social justice issue. Our review allows us to propose two models relating to high-rise living relevant today, based on these differences.

**Keywords:** high-rise apartments; social justice; mental health; stress; wellbeing; socioeconomic status

## 1. Introduction

### 1.1. History

High-rise and vertical building is thought to have begun in the ancient civilizations of Egypt and the Americas with the construction of pyramids, temples and community structures. The architectural challenges of building multistorey residential buildings continued with the Roman Empire [1]. Large modern high-rise cities and suburbs began to emerge in the last century, particularly across the United States, India, China, South East Asia and South America to house booming populations and massive urban migration, with some of these experiencing overcrowding, high-crime rates and the development of slums, which has helped stigmatise the experience of living in a high-rise apartment as a negative one [2]. This stigmatisation was made worse by the calculated use of high-rise complexes to segregate disadvantaged communities. In the period between 1940 and 1980 projects—such as Pruitt-Igoe in St. Louis, Clichy-sous-Bois in Paris, the Robert Moses-constructed projects in Harlem and the Bronx, and the Robert Taylor homes in Chicago—housed segregated disadvantaged communities in high-rise ‘boxes’ of poorly built, badly sited and under landscaped residential complexes [3], with most ultimately housing far in excess of their intended capacity. For example, America's largest public housing project, the now demolished Robert Taylor homes, was originally designed for 11,000 people,



but at one point housed over 27,000 people, of whom 95% were unemployed [4]. The escalating level of crime was such that in one weekend 300 separate shooting incidences were reported [5].

More recently, due to inner-city land shortages and compact city policies to reduce urban sprawl, a secondary high-rise boom is occurring in many developed countries, with a greater focus on more lucrative luxury apartment developments in inner cities and more established wealthier suburbs [6,7]. Perhaps to avoid the stigma still attached to housing commission flats, developers have fashionably adopted the term 'apartment' for these modern high-rise blocks [8]. However, while luxury buildings feature elaborate landscaping, spacious living areas and two or more bedrooms [9], there is a continuing socioeconomic divide with large numbers of 'budget' high-rises still found in disadvantaged areas and/or near transport hubs [10]. These are typically more cramped and crowded with lack of family privacy and significantly smaller in floor area than detached houses [11–13].

Today, people choosing to buy or rent high-rise apartments are attracted by a number of extrinsic and intrinsic qualities, although location and cost are usually the deciding factors [14]. Extrinsic factors include perceptions about neighbourhood and other residents [15], as well as proximity to public transport, education facilities and workplaces. For some, this also includes social facilities and nightlife [16]. Not having to maintain a house or garden may also be an extrinsic benefit. Desirable intrinsic qualities that may increase a resident's quality of life include the design of the building, the layout, orientation and size of the apartment [15], views of the surrounding area and safety features such as a security person employed in a lobby.

The majority of high-rise apartment complexes are also less expensive for developers to build than detached homes, so apartments cost less to purchase, even once common land attached to the apartment building and maintained for an annual fee by an apartment owners corporation, is taken into account [7]. In general, this also translates to cheaper accommodation for rental tenants. For this reason, high-rise apartments are increasingly preferred by government agencies providing housing for socially disadvantaged people.

Although there are considerable regional variations, the majority of people living in apartments in developed countries are singles or couples [17,18]. In Australia, only 12.5% of high-rise apartment dwellers are two-parent families [19]. Apartment living is less appealing to families, because children's activity levels are restricted [1,20], and parents are reluctant to let young children play unsupervised in common areas [18]. Apartment dwellers are typically younger people seeking proximity to central locations or older generations no longer wanting to maintain a house and garden or seeking a change in lifestyle [6,7].

The future shows a forward trend in the development of high-rise apartment buildings, and in the number of levels incorporated into each building [14,21], both to accommodate more people and to reduce the individual carbon footprint. The sustainability and quality of life in these buildings underscores the growing need for liveable high-density cities [22] to better manage urban sprawl, traffic congestion and infrastructure demands [16].

### 1.2. Living Conditions

High-rise apartments of four stories and above [20] have been typically constructed to solve housing and land shortages, and create affordable residential spaces. While this might provide cheaper housing, it can also produce adverse living conditions: apartments can be isolated, difficult to access, hard to ventilate, more elevated from the earth (the soil), and more quarantined from a diversity of microbes, plants and animals than traditional housing [1,23]. This burden of adversity is often greatest in socio-economic disadvantaged communities in high-density areas whose circumstances also restrict access to parks, sporting complexes, gardens or other natural spaces, with consequences for both physical and mental well-being, as well as opportunities to meet and socialise with others. Astell-Burt and Feng [24] found that residents of poor socioeconomic areas were much less likely to exercise—a known predictor of positive mental wellbeing. Many apartment buildings also discourage

or disallow pets, another factor increasing wellbeing. Dogs, for example, encourage physical and social activity (including visits to green spaces) and meeting other dog owners [25–27].

While socioeconomic disadvantage and environmental stress are associated with higher predisposition for mental health issues and drug and/or alcohol dependency, it is unclear whether the ‘high-rise environment’ is creating the living conditions that lead to mental ill health or whether these environments attract residents that already have mental issues. And if the latter, do these buildings make matters worse? The location, vista, floor level and size of the apartment determine the purchase price or rental yield, and therefore the social demographic that will live there. For example, apartments that were built with luxury in mind in a green interesting environment will attract an older demographic that is seeking a low maintenance property in comparison with an apartment built next to a freeway or railway station that has been built for a housing agency [10].

High-rise buildings can have direct and indirect effects on health. Polluted air quality, unsafe heating systems, the presence of toxic substances, pests, and overcrowding cause direct biological, chemical or physical effects and are easier to address than indirect effects such as individual characteristics and socio-economic circumstances [28]. This paper focuses on the indirect effects on health. We summarise the evidence for links between stress and social wellbeing in city settings, specifically the relationships between high-rise living and social wellbeing and occupant’s stress levels, and their influence on mental health. We then formally review the literature on high-rise living and mental health and explore how exacerbation of mental health issues of high-rise dwellers in poor socio-economic areas could be reversed with a number of strategies.

## 2. The Contribution of Stress and Social Well-Being to Mental Health Problems

### 2.1. Stress and Mental Health

Mental health is essentially a measure of resilience, and has been defined as “the ability to adapt personally and collectively to a given environment . . . to mature and fulfil potentials . . . living in homeostatic balance” despite the changing environment [20]. However, there is every indication that factors in the modern environment are eroding resilience and capacity to buffer stress. This is reflected in the staggering increase in mental health disorders, especially anxiety and depression, predicted by the World Health Organisation to become one of the major threats to human health by 2020 [29,30]. This also has implications for economic prosperity, as stress, depression and anxiety are the second major cause (13.7%) of work-related issues in Europe [31].

Stress, described in 1915 by Walter Cannon as ‘an acute threat to the homeostasis of an organism’, contributes to physical and psychological well-being [32,33]. While humans can readily adapt to acute stress, chronic stress can negatively affect brain structure and function [33]. This can affect long term resilience and predisposition to a range of psychiatric diseases, including schizophrenia, depression, and anxiety [34,35]. Susceptibility to stress is a reflection of complex individual, community, social, and environmental factors, of which neighbourhood factors are clearly important. Mental health disorders are more prevalent in urban areas, although the influence of urban structure is not well known [36].

Living in high-rise flats or apartments has been associated with higher rates of psychological distress [37]. This is multifactorial and may relate to concerns about housing, feeling trapped in deprived social environments [37], fears of falling from windows or balconies, being trapped by fire, earthquake, or terror attacks [1,38], and fears of acquiring a communicable disease through sharing elevator buttons, door handles and hallway air [1].

Of particular concern to public health are high-rise buildings that were constructed during the post-war boom of the 1950–1970s of which many are in poor condition, house disadvantaged communities and are located in low socioeconomic suburbs [28]. Architects in the 1970s raised concerns that “there is abundant evidence to show that high buildings make people crazy” [39]. Even today,

there is a prevailing reputation of high-rise housing as socially isolating living environments, drug and crime havens and generally unhealthy places [28,40].

## 2.2. Mental Health and High-Rise Living

### 2.2.1. Floor Level

First, we examined the role of floor level on mental health outcomes. One of the most comprehensive studies on this relationship was examined by Evans et al. [12] who conducted a critical review of the evidence on mental health and housing (including type, floor level and housing quality). They found that six out of eight studies reported residents of higher floor levels to have poorer mental health compared to residents of lower floors. Another study in Germany randomly allocated the wives of British and Canadian servicemen to floors in three to four level blocks of flats. The women on the fourth floor reported twice the levels of psychological distress as those living on the ground floor [41]. In a study of 964 adults living in high-rise flats in Scotland residents from the fifth floor upwards experienced twice the number of symptoms of poor mental health as those on lower floors and detached houses [42]. Similarly, a study found women on higher floors to have greater levels of emotional strain in a study of 442 public housing residents [43].

Evans et al. [12] surmised that more mental health problems are experienced by families living on upper floor levels. Panczak et al. [28] used data of 1.5 million people from the Swiss National Cohort in a more recent study that looked at whether floor level was linked to cardiovascular disease and found instead that people living on the eighth floor and above had a substantially increased chance of suicide by jumping. It may be argued that this was because of easy access to a place of great height but those people living above the eighth floor may have been socially isolated which contributed to their mental health issues. From the fifth floor and upwards residents become disconnected with what is going on in the world around them as they cannot see what is happening on the ground [22,28,44].

In regards to floor level, it is not known whether people with existing mental health conditions choose to live on higher floors, or whether this contributes to their condition via isolation factors; although Moore [45] found that neurotic personalities living in flats were more likely to experience psychiatric illness compared to stable personalities.

### 2.2.2. Street and Surroundings

Next, we examined whether poor socioeconomic 'streets' similarly contain socially disadvantaged residents as has been shown for high-rise buildings. According to McCarthy et al. [37] symptoms of mental disorders are less likely to be found in streets of similar householders than in high-rise flats located within 'inner-city problem' estates. Rates of psychological distress were compared for different dwelling types located in 'easy to let' and 'difficult to let' council areas and those who lived in 'difficult to let' high-rise housing were shown to be particularly vulnerable. One of the issues with unsatisfactory housing is that when residents get better opportunities and have the resources to move out, they leave the more disadvantaged residents, thereby creating social ghettos [37]. These people may not have a choice in their housing arrangements compared to residents of high-rise buildings in more affluent areas. From the above literature, it appears to be that the types of areas people inhabit are more closely associated with mental illness. For example, Ellaway [46] reported that residents' negative perceptions of their surroundings were associated with poor mental health. A study of four disadvantaged sites in Melbourne, Australia (two high-rise and two detached homes) found that high-rise dwellers had greater negative perceptions of the neighbourhood that led to poor health and well-being than did residents in detached homes, thus leading to the conclusion that a concentration of disadvantaged people in a high-rise building not only increases crime and insecurity for the surrounding area but decreases mental health for the residents [47].

### 2.3. Thematic Review

The literature was searched for articles assessing the relationship between high-rise housing and mental health and overall 25 relevant journal articles were found, including those already mentioned. Synthesis of key themes, study focus and health outcomes of the 25 journal articles are presented in Table 1. The method and full findings can be found in Appendix A. The majority of studies were conducted by surveys, either self-reported or by interview. The limitations of the searched literature were that not all studies could be retrieved in full detail, and it was not clear how many floor levels were in some of the earlier studies of flats.

**Table 1.** Summary of key themes, mental health study focus, high-rise health outcome (in comparison to low-rise/detached houses) for 25 found articles from 1967 onwards assessing the relationship between high-rise housing and mental health across a broad spectrum of mental health categories (<less, >greater).

Key Theme	Mental Health Study Focus	High-Rise Health Outcome	References
Social wellbeing	Social isolation/less social interaction	>social isolation	Fanning [41]
		<social support and involvement	Wilcox and Holahan [48]
		<social interaction	Zalot and Webber [49]
		<social networks	McCarthy and Saegert [50]
		<social support	Churchman and Ginsberg [51]
		<social contact	Levi, et al. [52]
		>poor social outcomes	Kearns, et al. [18]
		>social isolation	Chile, et al. [40]
Social wellbeing	Alienation	>feelings of alienation	Amick and Kviz [53]
Psychological health	Nervous disorders	>neurotic scores	Bagley [54]
		>depression	Moore [55]
		>depression	Richman [56]
		>emotional strain	Gillis [43]
		>psychological distress	McCarthy and Saegert [50]
		<depression after moving out	Littlewood and Tinker [13]
		>psychological distress	McCarthy, et al. [37]
		>psychological distress	Husaini, et al. [57]
		< stress coping skills	Dasgupta, et al. [58]
		>mental symptoms	Hannay [42]
Psychological health	Suicide	>suicide by jumping on higher floors	Panczak, et al. [28]
		<self-rated health	Verhaeghe, et al. [44]
Psychiatric health	Psychiatric problems	>neurotic personalities likely to experience psychiatric illness	Moore [45] Edwards, et al. [59]
		>perceived negative influence	Warr, et al. [47]
Sense of place	Perceptions of neighbourhood factors that influence health	>perceived negative influence	Warr, et al. [47]
Sense of control	Sense of efficacy (control)	>sense of efficacy after moving out	Rosenbaum, et al. [60]

The studies in Table 1 clearly show an exacerbation of mental health problems in high-rise buildings in comparison to low-rise or detached houses. Psychological problems (58%) and social isolation (35%) featured prominently in the literature as areas of difficulty for apartment dwellers, and contributing to this are socio-economic factors and building design. Chile et al. [40] found consistent experience and expression of social isolation across all age groups. Although there are many factors that contribute to social isolation in high-rise apartment living, social isolation in itself is shown to be an important factor that contributes to mental health problems of high-rise dwellers [18,40].

It may be harder to form a community in high-rise apartments as it feels as if one is living with many strangers [18,50].

Many of the early study subjects of high-rise apartments were women, and Richman [56] found that complaints of depression were common. Gillis [43] found that higher floor levels predicted higher levels of emotion strain, and Littlewood and Tinker [13] found that women showed fewer symptoms of depression after moving out of high-rise apartments.

### 3. Proposed Causal Sequences

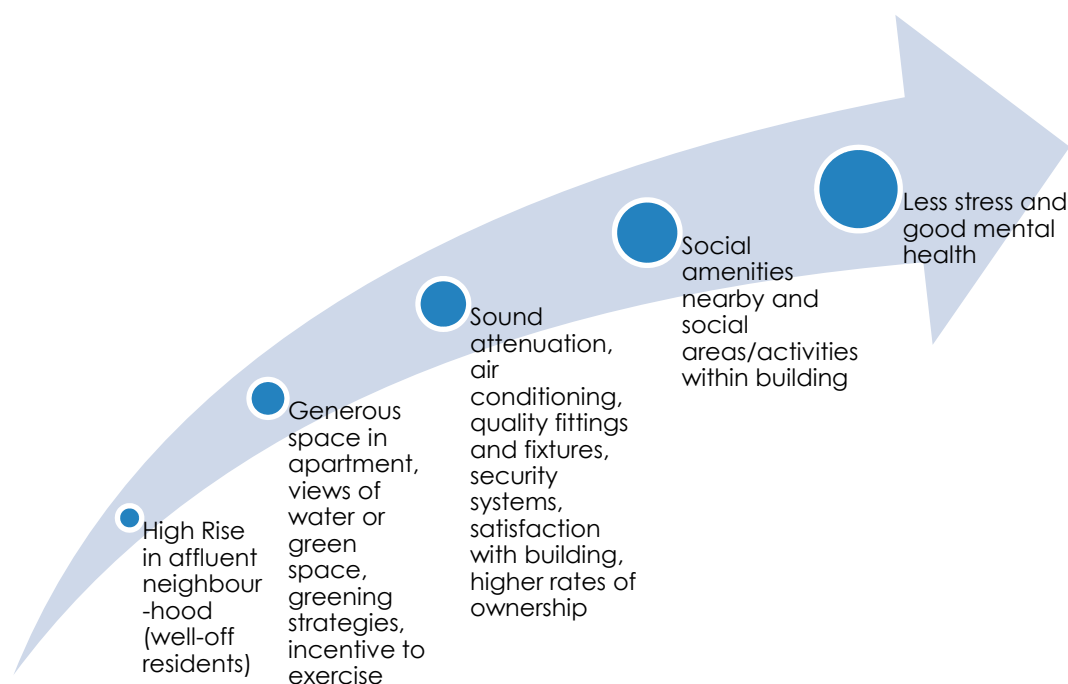
The factors examined in this review are stress, social wellbeing and mental health, and how or whether living in high-rise buildings might be related to them. There are clearly a number of confounding factors—such as the design of the buildings (although no studies have been found on the link between building design and mental health), the place in which they are situated and the type of person living in them—which may be modifying these relationships. Furthermore, the design of many studies does not include prior status of health, and greater than 80% are correlative only.

Drawing from the early research conducted in the 1970s and 1980s, (mostly studied on non-affluent areas), and the construction of modern high-rise apartments in western developed countries, a divide exists today between ‘rich and poor’, particularly in the area of public housing [61]. We use the flow diagrams below (Figures 1 and 2) to represent both sides of this divide and form the beginnings of a hypothesis on the causal pathways and compounding effects of high-rise apartment living that could be inferred by social justice and affluence [24].

Figures 1 and 2 explain the difference between where a high-rise apartment is situated (low socioeconomic or affluent area) as to what type of demographic might live in an apartment in that area. For example a high-rise in a low socioeconomic area may have environmental health concerns, limited green space, a higher likelihood of renters rather than owners, and occupant dissatisfaction with living space and neighbourhood. This is in contrast to a high-rise in an affluent area that may have interesting views, generous living space, social amenities and nearby green space. From the type of person living in the apartment in combination with the features and landscape of the apartment building, this may then determine whether a person develops a mental health disorder.



**Figure 1.** A possible causal sequence of high-rise apartments in poor socioeconomic areas where environmental health problems, dissatisfaction of living space, limited green space and a higher likelihood of renting may lead to social isolation, security fears and declining mental health status.



**Figure 2.** A possible causal sequence of high-rise apartments in affluent areas where good environmental health, satisfaction of living space, access to green space and social amenities that lead to higher ownership, may lead to less stress and good mental health.

#### 4. Housing Interventions to Increase Wellbeing

##### 4.1. Relocation

The demographic concepts described above has lead Gifford [1] to question whether moving people from high-rise apartments in a poor socio-economic area into luxury apartments would improve their mental health. To some degree, the high-rise residents could escape at least some negative effects on mental wellbeing, however if mental disorders/drug and alcohol problems are already established, the benefits may be more limited. In other words, the outcomes of living in a high-rise apartment are moderated to some extent by the ‘characteristics and qualities of the residents themselves’ [1]. However, two studies have found that residents of high-rise public housing who relocated to detached (stand-alone) homes as opposed to other high-rise buildings showed improved mental health [13,60]. Using 267,000 responses to the Kessler 10 Psychological Distress Scale, Astell-Burt and Feng [24] also found that people on low incomes living in affluent areas were less likely to experience psychological distress than those living in low socioeconomic areas. Collectively these findings suggest that extrinsic living factors remain an important determinant in mental well-being. The Gautreaux Program in Chicago in the United States saw over 3500 families randomly moved from high-rise deprived areas to either other high-rises or suburbs and followed up over a longitudinal study. It was found during telephone interviews of 100 mothers and children who moved to the suburbs, that they felt the high-rise buildings were like ‘a restrictive prison environment’, and once they moved they gained a new sense of efficacy due to freedom from fear [60]. The reverse is also possible, with depression emerging after being moved from an affluent neighbourhood to one of poor socioeconomic status.

##### 4.2. Green Space

Another potential intervention relates to the amount of green space surrounding residential buildings. If greening strategies were employed around the high-rise buildings so that residents could be exposed to green space, studies have shown that they would report fewer symptoms of psychological distress [29]. An explanation for the better mental health of residents of high-rise buildings in more

affluent areas (with generally more environmental biodiversity) is the psychophysiological stress reduction theory. The theory proposes that contact with nature can shift highly stressed people to a more positive emotional state [62,63]. Van den Berg et al. [64] suggest that the general health of populations in lower socio-economic areas would benefit the most from having green spaces in their living environment.

No research to support the positive impact of access to green space interventions for high-rise dwellers could be found.

## 5. Further Research

Relocation, as discussed above, warrants a longitudinal study to determine if residents would still experience social isolation and psychological stress after the apparently positive social transition. For green space interventions, carefully controlled comparative studies would need to take into account the likelihood that wealthier high-rise dwellers may be more able to access help for mental health issues, and have access to private transport to visit green spaces and other community facilities. With cross-sectional designs, because of the ‘moment in time’ aspect of these type of studies there is the classical debate that residents who have poor mental health may choose to live in high-rise apartments and upper floors due to the causality of associations [11,12,44], however this debate may have unfounded claims. Gifford [1] ascertains that no causal conclusions between high-rise apartment living and mental health can be drawn because of the uncertainty over whether any study of high rise apartments meets standard criteria for scientific hypothesis testing, which is often because researchers have been forced to use research designs that are sub-optimal. The majority of studies used self-reported surveys that are still being used in valid research today. Verhaeghe et al. [44] state that most architectural studies claiming that ‘high buildings make people crazy’ are old and do not take into account socioeconomic position however most high-rise buildings of the post-war construction boom were built in more deprived areas and therefore comparative socioeconomic studies were not considered. Although observational or longitudinal design would be beneficial, the weight of replication of the cross-sectional studies with similar conclusions means that those results should still be taken into account, particularly when informing socioeconomic policy. Additional studies involving floor level and comparisons between high-rise apartment locations (while controlling for socioeconomic status) would be useful to investigate possible interventions and to add to the literature for a more definitive conclusion.

## 6. Conclusions

Inequitable approaches to urban design have a powerful influence in perpetuating social disadvantage and mental adversity. The socioeconomic status of intended residents remains a dominant undercurrent in divergent approaches to high-rise building design in high-density urban cities. With increasing urban migration, this will amplify health inequities, stress, crime and poverty, making cities increasingly “unhealthy” unless new approaches are mandated. Our investigation of the relationships between high-rise living and social and mental wellbeing revealed clear evidence that location plays a key role in the socioeconomic structure of the building. Poorly thought-out placement of high-rise buildings can have an adverse socioeconomic effect on city areas with a flow-on effect to the people living in those areas. In addition, a concentration of disadvantaged residents in one high-rise building increases the risk of adverse mental health outcomes.

We suggest a series of feasible strategies that may be considered—ideally with urban planners working closely with the communities they serve to co-create healthier environments. Preferably these strategies, wherever applied, should be evaluated for their impact on mental health outcomes. One strategy is to encourage a mixed tenancy of affluent and disadvantaged residents or a mix of privately owned and rented apartments with a view to maintaining this mixed quota. Another is using relocation of residents of high-rise buildings in poor socioeconomic areas to either detached homes or perhaps other high-rise buildings in more affluent areas. A strategy that encourages exposures to

environmental biodiversity (natural environment consisting of trees, plants, grass and species richness) may enhance urban design to benefit the mental health of high-rise dwellers in low socioeconomic areas. This is particularly important in cities with land and resource scarcity that inhibit designing new green spaces or new lower density suburban hubs. It would also help to bridge the gap between wealthy and low socioeconomic areas of a high-density city and can be achieved retrospectively by utilising greening strategies such as streetscaping, redesigning unused grey spaces, living walls, or communal rooftop gardens. For high-rise apartments without balconies, it is advised to develop communal green space around the apartment building and encourage indoor plants. Finally education for strata corporations is also suggested to allow residents to keep pets and grow plants themselves.

Overall, our review shows that social justice has a part to play in redefining equitable high-rise apartment living for better mental health outcomes.

**Author Contributions:** Conceptualization, D.L. and P.H.; writing—original draft preparation, D.L.; writing—review and editing, D.L., E.V., P.H., S.P.; visualization, D.L.; supervision, P.H., E.V., S.P., A.L.

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## Appendix A. Investigation of Literature

### Methods

The literature was searched using the Web of Science and Pubmed databases. A Google Scholar search was also conducted to help identify any ‘grey’ literature or papers not in major journals. Key literature was also hand searched for relevant supporting literature not previously identified. Papers were included if they were in English and peer-reviewed journal articles. A time limit was not set as there were a limited number of articles in recent years, and for this reason, reviews were included. Search terms used were ‘apartment’, ‘high-rise’, ‘condominium’, ‘high density’, ‘multi-family’, ‘urban’, ‘housing’, and ‘wellbeing’, ‘mental health’, ‘stress’ using a variety of combinations to target key references. Identification of areas for future exploration is discussed. Key papers for floor level and mental health were graded according to the criteria in Table A2.

**Table A1.** Key paper grading criteria of high-rise apartment studies.

A GRADE	B GRADE	C GRADE	D GRADE
contains a comparison between high-rise and low-rise	contains a comparison between high-rise and mid-rise	contains a comparison between high-rise floor levels	contains high-rise data only



**Table A2.** Summary of findings for articles assessing the relationship between high-rise housing and mental health (n = 25).

Reference and Study Design	Grade	Sampling Method	Type of Housing	Subject's Age, Gender and Ethnicity	Number of People	Health Specialty	Findings of Note
[41] Random Assignment	A	Doctor's Records	Flats vs. houses	Women with medical issues (first consults) from the United Kingdom/Canada	1500	Mental/Psychoneurotic	Social isolation of women in flats
[53] Cross-sectional	A	Survey	High-rise vs. low-rise	Public housing residents (United States)	915	Alienation	Significantly higher levels of alienation in high rise buildings
[54] Cross-sectional	A	Survey	High-rise vs. two stories with a garden	Women (United Kingdom)	69/43	Neuroticism and Medical Doctor (MD) visits	House dwellers had fewer neurotic scores and fewer visits to MD with nervous disorders
[56] Cross-sectional	A	Survey	High-rise vs. low-rise v. houses	Women (United Kingdom)	75	Psychological problems	More loneliness and depression complaints from women in high-rises
[55] Cross-sectional	A	Survey	Flats vs. houses	British and Canadian servicemen's wives	169	Depression	Women living in houses had less depression than those living in flats
[45] Cross-sectional	A	Survey	Flats vs. houses	British and Canadian servicemen's wives	167/167	Psychiatric illness	Neurotic personalities living in flats more likely to experience psychiatric illness than stable personalities in flats. No similar difference in house dwellers
[42] Cross-sectional	A, C	Psychiatric Screening Survey	High-rise Floor 5+ v. Floors 1–4 vs. detached homes	Random adults from a health centre (Glasgow, Scotland)	964	Mental symptoms	People on the 5th floor or above had twice the number of mental symptoms as those on lower floors (or in other types of housing)
[48] Cross-sectional	A	Survey	High-rise vs. low-rise dormitories	Students (2nd-year freshmen) in the United States	110	Social interaction/social support	High rise dwellers found to have less social support and less socially involved
[43] Cross-sectional	A, C	Survey	Eight types of public housing Inc. high-rise	Public housing residents, Canada	442	Psychological strain	Floor level predicts higher levels of emotional strain for women
[49] Cross-sectional	A	Survey	High-rise vs. detached homes	Canada	87	Social interaction	Residents of detached homes had more contact with neighbours
[50] Random assignment	A	Survey	High-rise (14 stories) vs. low-rise (three stories)	Adults, mostly of Puerto Rican or African American descent	60	Psychological distress, social support	Greater social overload, less social networks, less attachment to the community

Table A2. Cont.

Reference and Study Design	Grade	Sampling Method	Type of Housing	Subject's Age, Gender and Ethnicity	Number of People	Health Specialty	Findings of Note
[13] Longitudinal	A	Survey	High-rise vs. detached homes	Women	Unknown	Depression	Fewer symptoms of depression after moving out of high-rise
[59] Cross-sectional	A	Survey	Multi-family dwellings vs. single family dwellings.	Canadian families	560	Psychiatric problems	More psychiatric problems amongst men in multi-family housing, no difference in women
[37] Cross-sectional	D	Self-reported survey	Eight types of housing area	Adults, local authority housing, United Kingdom	674 (383 households)	Psychological distress	Symptoms most prevalent in 'difficult to let' housing—location rather than type
[51] Cross-sectional	A	Survey	High-rise vs. low-rise owned apartments	Women, Israel	344	Social interaction	High-rise dwellers encountered more people, and more who were strangers
[57] Cross-sectional	A	Survey	High-rise vs. detached homes	Elderly men and women, South Africa	600	Psychological distress	High rise residents in low SES areas experienced more psychological distress
[52] Cross-sectional	A, B	Survey	High-rise v. mid-rise vs. low-rise	Adults, children and elderly, China	503	Mental health	More social contact with neighbours in low rise v. mid-rise and high-rise
[58]	D	Survey	High-rise	Elderly men, India	100	Mental health	Residents failed to cope with the stress produced by living in high-rise buildings
[47] Cross-sectional	A	Survey	High-rise vs. detached homes	Adults in four socio-economically disadvantaged sites in Melbourne, Australia	1199	Perceptions of neighbourhood factors that influence health	Residents of high-rise towers were more likely than other residents to nominate proximal aspects of the neighbourhood as having a perceived negative influence on health.
[60] Random Assignment	A	Interview	High-rise vs. detached homes	Gautreaux Program—Mothers and children, Chicago, United States	100	Sense of efficacy (control)	Residents who moved out of high-rises into detached homes reported a greater sense of efficacy including freedom from fear.

Table A2. Cont.

Reference and Study Design	Grade	Sampling Method	Type of Housing	Subject's Age, Gender and Ethnicity	Number of People	Health Specialty	Findings of Note
[18] Cross-sectional	A	Survey with interview	14 social housing areas, high-rise to low-rise	Glasgow, United Kingdom	1392 high rise/1848 houses	Residential, social, psychosocial	Poor social outcomes in high rise flats (for all factors), some psychosocial outcomes worse in high rise flats.
[28] Cross-sectional	A, C	Survey	High-rise of four floors and above, Comparison of floors 1–15	Census data, Switzerland	1,500,015 (160,629 high rise buildings)	Mortality	Mortality from all causes higher in ground floor dwellers. Suicide by jumping increased on higher floors at a rate of 0.41%.
[40] Cross-sectional	D	Self-reported Survey. Interview, Focus Groups	High-rise	Auckland, New Zealand	429 Surveys, 30 interviews, four focus groups	Social isolation	The experience and expression of social isolation was consistent across all age groups, with highest correlation between functional social isolation and “being student”, and older adults (60+ years), length of tenure in current apartment and length of time residents have lived in the inner-city.
[44] Cross-sectional	A	Self-reported Survey	High-rise vs. low-rise	Census data and Belgium Register, Belgium	2,998,227 Male 3,104,593 Female	Self-rated health	Residents' worse self-rated health in high-rise buildings can be explained by the strong demographic and socioeconomic segregation between high- and low-rise buildings in Belgium. A weak, but robust positive curvilinear relationship between floor level and self-rated health within high-rise buildings.

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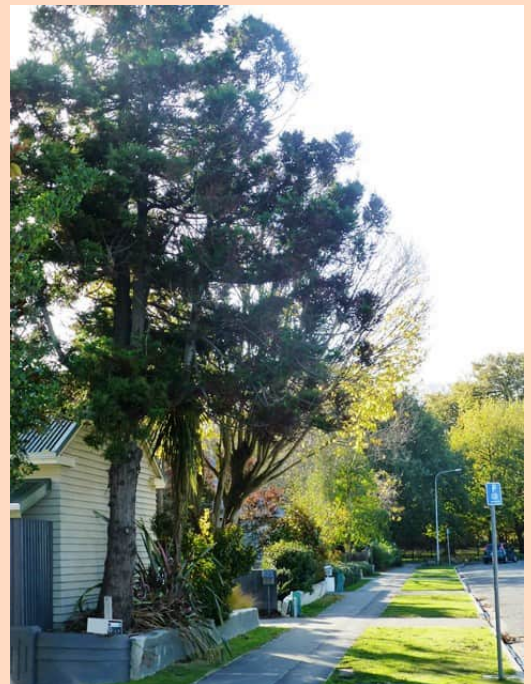
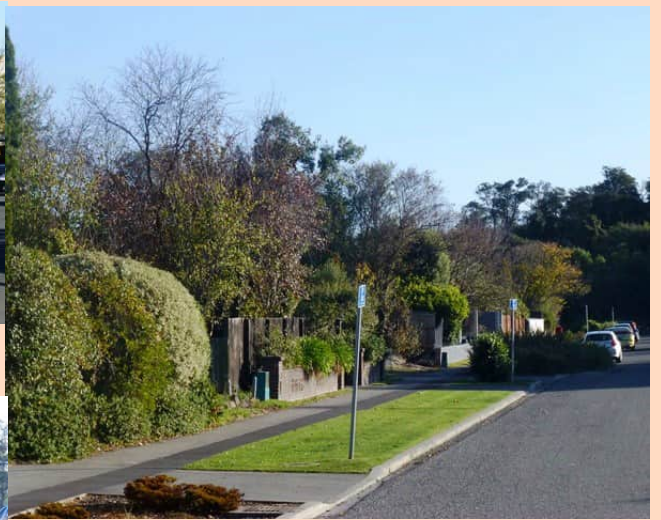
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Views from houses incorporating the foliage on sections looking across Rata Street to the backdrop of Riccarton Bush trees

APPENDIX 6



# APPENDIX 7 STREETSCAPES in the Kauri Cluster





## Urban greening can reduce impact of global heating in cities, finds study



*Hackney, London. The study found urban areas are on average warming 29% more quickly than rural areas. Photograph: Bloomberg/Getty*

**Urban greening initiatives such as planting street trees, rainwater gardens and de-paving can help mitigate the impacts of urban heating due to the climate crisis and urban expansion, according to a study that has found cities have been warming by 0.5C a decade on average.**

Scientists at Nanjing and Yale Universities analysed satellite data from across 2,000 cities and compared surface temperature readings between cities and rural areas from 2002 to 2021.

The study found on average that cities are warming by a rate of 0.56C a decade during the day and 0.43C a decade at night. In comparison, rural areas are warming by 0.4C a decade during the day and 0.37C a decade at night, which means urban areas are on average warming 29% more quickly than rural areas.

The scientists found a link between a city's size and the rate of urban warming, with megacities warming on average by 0.69C a decade during the day, compared with 0.41C a decade during the day in smaller cities.

There were also disparities in the rates of urban heating between continents, with cities in Asia – the continent with the most megacities – warming most rapidly during the day and night. Cities in Europe were found to be warming the least during the day, while cities in Oceania were warming the least at night.



*Chongqing, a megacity in south-west China. There were disparities in the rates of urban heating between continents, with cities in Asia warming most rapidly during the day and night. Photograph: Mark Schiefelbein/AP*

In about 90% of the cities surveyed, scientists found the climate crisis is the greatest contributor to urban warming, with about 0.3C of heating a decade attributed to human-induced climate change on average. However, scientists noted that urban expansion can also influence urban heating – in parts of China and India, rapid urbanisation is contributing to about 0.23C of urban warming a decade.

But urban greening schemes such as tree planting, in which exposed land surfaces are replaced with natural vegetation, can help reduce the rate of urban warming by producing a cooling effect particularly at night, by capturing some of the surrounding surface heat for storage, according to the report.

In Europe, urban greening has been found to offset the rate of urban warming by 0.13C a decade on average. Likewise in Chicago, an urban greening scheme to increase tree coverage after a heatwave in 1995 has helped to decrease the rate of urban warming by about 0.084C a decade.

The authors of the study have urged policymakers to consider using urban greening schemes to reduce urban warming, calling it an effective strategy that can reduce the impact of the “urban heat island” phenomenon, hence reducing the risk of exposure to future heatwaves that are much more likely to impact cities.

Jon Burke, the climate change manager at Gloucestershire council, suggested a number of greening initiatives such as rainwater gardens that can make a real difference to urban heating. He said vegetation had “a big role to play in moderating all the types of urban heating” and could bring additional social benefits such as “reduced crime and prescriptions for antidepressants”.

UK urban leaders should have taken green infrastructure investment more seriously a decade ago, he said, adding that at present “there isn’t one urban area within the UK with average canopy street cover above 40%”, which is the minimum amount of cover needed for a cooling effect to take place.

Burke said leaders needed to “initiate an urgent race” to prevent further damage from heatwaves and floods in cities, adding that there were few better investments a city could make in the health and security of its residents than urban greening.

Grahame Madge, a Met Office spokesperson, said the organisation’s “high-resolution projections” are helping local authorities to better understand the impact of extreme heat in cities.

He said: “The Met Office has been working with a number of local authorities to help inform their heat resilience strategies and planning. When they combine this information with their own mapping they gain a far clearer picture of where the areas of greatest risk are across the city ... this ability to know where to focus effort is extremely important.”

*Thank you for joining us from New Zealand.*

*“It’s now or never” for tackling the climate crisis. That was the blunt warning that stood out from the UN’s most recent comprehensive review of climate science, drawing on the work of thousands of scientists over many years.*

*As environment correspondent, I’ve spent 18 years grappling with this data and reporting on the science – and this is without a doubt the starkest language yet, the strongest words I’ve ever heard from a body that is sometimes criticised for pulling its punches, and whose conclusions are often vetted and watered down by world leaders keen to diminish their impact.*

*The truth is that this latest report is the last one to be published while we still have a realistic chance of limiting global heating to 1.5C above pre-industrial levels.*

*At the Guardian, we feel that up-to-date, fact-checked, independent journalism is key to taking meaningful action. That’s why we have been reporting on global heating for decades, and giving scientific findings more publicity and prominence than any other news organisation. We have put the climate crisis at the heart of our work, knowing that accurate information is essential for the future of humanity, and the health of planet Earth.*

*Waseem Mohamed*

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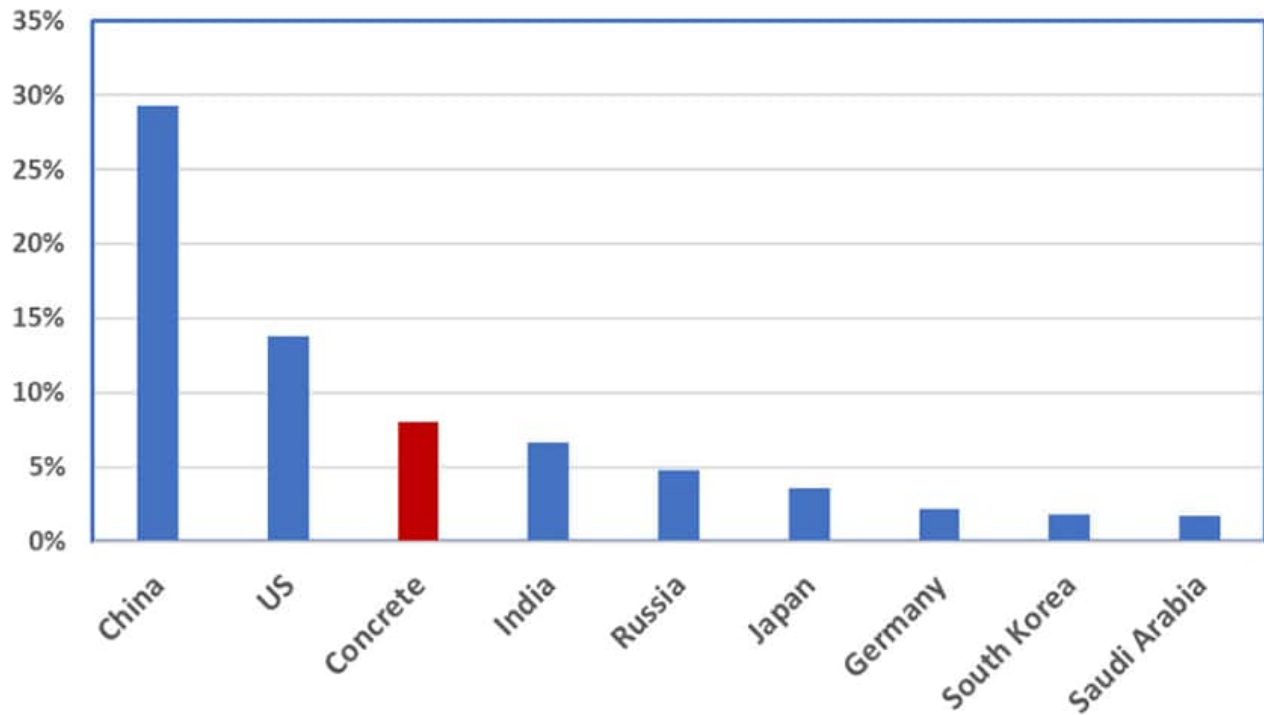
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# Global Warming Has Concrete Problem When It Comes to CO2

[ecori.org/climate-change/2019/10/4/global-warming-has-a-co2ncrete-problem](https://ecori.org/climate-change/2019/10/4/global-warming-has-a-co2ncrete-problem)

Jo Detz

October 4, 2019



If concrete were a country, it would be the third-highest emitter of carbon dioxide.

## Graphics and text by ROGER WARBURTON/ecori News contributor

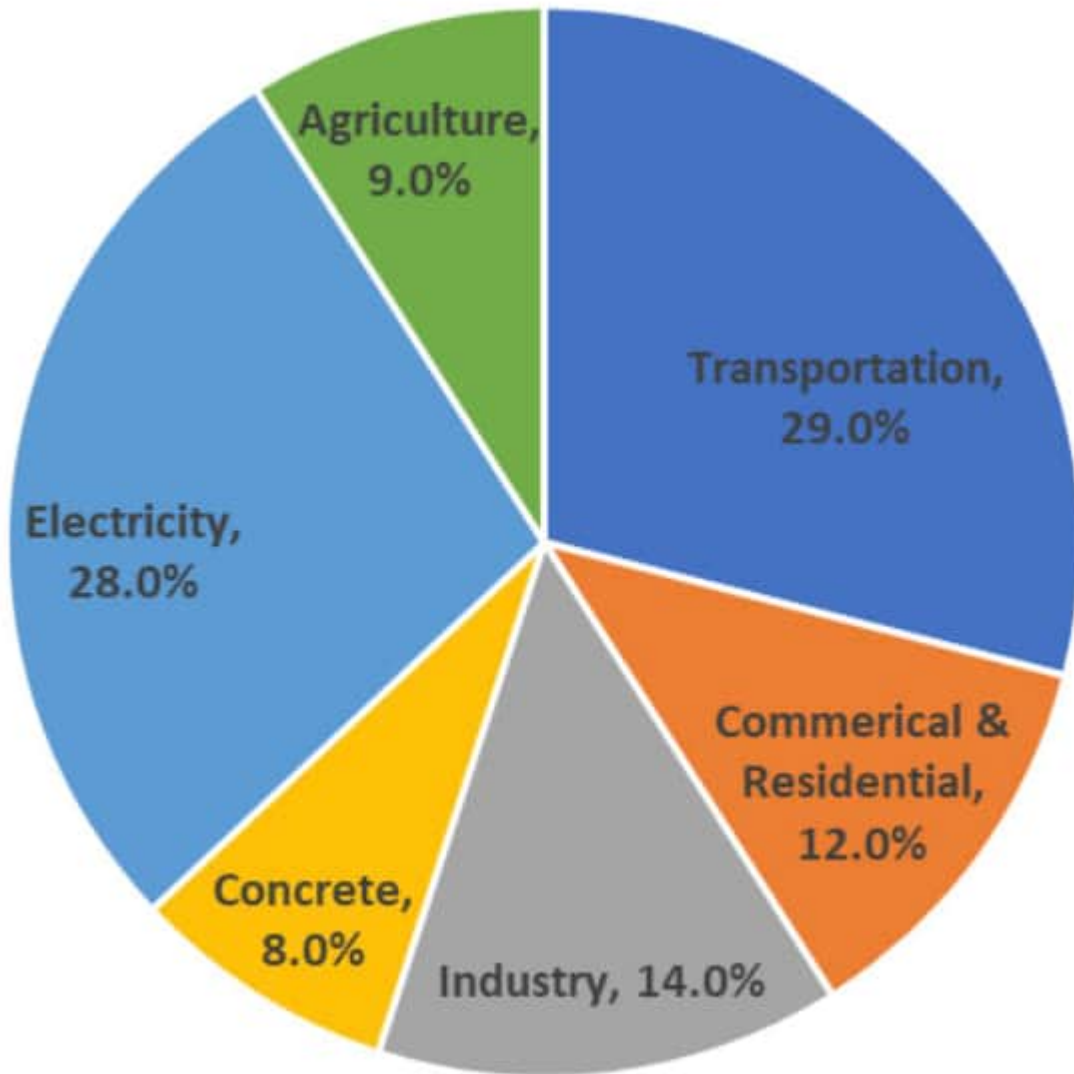
Concrete is a major contributor to the climate crisis because its production releases huge quantities of carbon dioxide into the atmosphere. Carbon dioxide and methane are the two greenhouse gas most responsible for global warming.

The carbon dioxide emissions from the production of concrete are so high that if concrete were a country, it would be the third-largest emitter of CO2 behind China and the United States.

Concrete is the most widely used artificial material in existence. The only thing we consume more of is water.

Concrete  
currently  
accounts  
for about

8 percent  
of the  
carbon  
dioxide  
being  
emitted  
into the



Carbon dioxide emissions by business sector.

atmosphere, dwarfing the aviation industry's contribution of 2.5 percent. Concrete's contribution of CO<sub>2</sub> is comparable to the entire agriculture industry, which is responsible for 9 percent of carbon emissions.

The central ingredient in concrete is cement, which is made by crushing limestone and clay and adding iron ore or ash. The mixture is heated in a kiln to more than 2,600 degrees Fahrenheit, a process that consumes vast quantities of fossil fuel.

When heated, the calcium carbonate in limestone breaks into calcium oxide and carbon dioxide, which is released into the air. The calcium oxide is ground with limestone and gypsum to make cement.

Half of the CO<sub>2</sub> emissions in the production of concrete come from the reaction that breaks up the calcium carbonate and the other half from the fossil fuels required to heat the kilns and transport the materials.

To help understand the scale of the concrete problem, here's a local example. Let's start by calculating the carbon dioxide released by the concrete in a single lane of an interstate highway.

According to the Federal Highway Administration, an interstate lane is 11 inches thick and 12 feet wide. Therefore, the volume of concrete in a mile (5,280 feet) of concrete is:  $11/12 \times 12 \times 5,280 = 58,080$  cubic feet.

One cubic foot of concrete weighs 150 pounds, so the concrete in a mile of interstate lane weighs:  $58,080 \times 150 = 8.7$  million pounds.

The National Ready Mixed Concrete Association says that, during production, each pound of concrete releases 0.93 pounds of carbon dioxide. Therefore, the CO2 released in the construction of a mile of a single interstate lane is:  $0.93 \times 8.7$  million = 8.1 million pounds of carbon dioxide.

The length of Interstate 95 through the state of Rhode Island, from Connecticut to Massachusetts is 43.3 miles. I-95 is four lanes in the south and six lanes through Providence. If we add the 4.3 miles of Interstate 195 from Providence to the Massachusetts line, the interstates in Rhode Island account for 242 miles of lanes.

Therefore, the construction of the Rhode Island interstates released  $242 \times 8.7$  million = 2 billion pounds of carbon dioxide.

To provide a context for that number, let's compare it to the emission of carbon dioxide from our cars. The Department of Transportation says that in 2017 the average Rhode Islander drove 12,781 miles.

In 2017, average U.S. gasoline consumption was 24.7 miles per gallon, up slightly from 2016, but well-below the government's target. Therefore, each of us used about 517 gallons of gas.

Each gallon of gas releases 18.1 pounds of carbon dioxide into the atmosphere. It may be surprising that a gallon of gas, which weighs 6.3 pounds, makes 18.1 pounds of CO2 when it burns.

That is because gasoline is made of octane and each octane molecule has a string of eight carbon atoms. When octane burns, each of the eight carbon atoms grabs two oxygen atoms from the air to make eight CO2 molecules.

Therefore, the 517 gallons of gas consumed by each Rhode Islander emitted  $517 \times 18.1 = 9,356$  pounds of CO2 into the air.

The 2 billion pounds of carbon dioxide released in the construction of Rhode Island's

interstates is equivalent to the following number of drivers:

$$\frac{2,000,000,000}{9,356} = 213,766$$

That is, the carbon dioxide released in the building of Rhode Island's interstates was the same as the CO2 released by the burning of an entire year's worth of gas by more than 213,000 local drivers.

Of course, building the interstates was a one-time event and we continue to drive our cars every year. On the other hand, we only calculated the carbon dioxide from the interstates, which are a small fraction of the roads in Rhode Island.

The lesson is that the climate crisis is a complex problem, requiring simultaneous action in many areas, including concrete production.

*Roger Warburton, Ph.D., is a Newport, R.I., resident.*



Bob Broughton &lt;bob@broughton.co.nz&gt;

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**Re: Affordability**

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Mike &lt;mikeyardley@xtra.co.nz&gt;

Fri, Dec 23, 2022 at 4:02 PM

To: RBK Residents Assoc &lt;rbkresidents@gmail.com&gt;

Will give it a good read.  
Thanks so much Tony.

On 23/12/2022 15:33 NZDT RBK Residents Assoc <rbkresidents@gmail.com> wrote:

Separate but very closely related, during our back and forth correspondence on intensification Megan Woods made the point to the media, (after we challenged the government on the need for Christchurch to densify to the extent proposed) that the intensification legislation was needed to address serious housing supply and affordability issues in Christchurch.

It was bunkum then and is still bunkum now. Witness the attached very recent study by JLL and the associated table (also attached) that ranks NZ districts and cities by affordability.

Stuff did a story on this JLL study, but ignored Christchurch. Or perhaps it did not have access to the table, or decided the Auckland angle was more important :(.

Tony

--

Riccarton Bush - Kilmarnock Residents' Association

*You can join our association by emailing name/s, street address and phone details to [rbkresidents@gmail.com](mailto:rbkresidents@gmail.com). Then pay \$5 each via internet banking to Account 02 0820 0531755 00 with surname as a reference. Alternatively, deliver the subscription to the Treasurer at [25 Rata St](#).*

**MIKE YARDLEY TRAVEL & MEDIA**

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@ [mikeyardley@xtra.co.nz](mailto:mikeyardley@xtra.co.nz)web <http://mikeyardley.com>Post [5 Parklands Drive, Christchurch 8022, New Zealand](#)**NZME Regionals, Stuff, Newstalk ZB, ODT, Metropol****For the Love of Travel, NZ Business Traveller, Kiwi Tripsters.**



# Christchurch is easily New Zealand's most affordable big city

Thursday 29 December, 2022

**New research looking at housing affordability shows Christchurch is the most affordable big city in New Zealand based, not just on price, but also on household income.**

[The study](#) by international property consultancy JLL focussed on how different thinking might solve our country's housing crisis. [The data behind it](#) shows Christchurch is more affordable than all other major centres and is also more affordable than most of the other 66 cities and districts it measured across the country.

The most expensive areas, relative to income, are the holiday spots. In Thames-Coromandel the ratio between median prices and household earnings, was 14 times the median household income. Auckland was not far behind with a ratio of 11. The Queenstown Lakes District is the 7th least affordable.

Christchurch, on the other hand, is 27th on the list, more affordable than Auckland, Hamilton, Tauranga, Rotorua, Wellington, Nelson and Dunedin. It is also, according to the research, more affordable than smaller North Island cities like Napier, Whangarei, Whakatane, New Plymouth, and Palmerston North.

JLL strategic consultancy head Jonathan Manns said the holiday locations are least affordable because wages in those areas are lower but the cost of housing remains high because holiday-maker demand. The most affordable areas tend to be those that are less accessed or accessible.

This new way of measuring affordability shows a new policy of rebalancing housing demand should be adopted, he said. "If the government was to focus on stimulating growth outside Auckland and Wellington, across both the North and South islands, it could enhance demand elsewhere and breathe new life into communities".

The research accepts inflation and rising interest rates have softened the housing market but says there are no indications of a long-term correction, either in terms of decreased pricing or increased supply. In other words, if we continue as we are there are no signs the affordability gap will close, it said.

The research also argues policy-makers should stop treating the housing crisis as solely a housing issue. It suggests focussing on other solutions like creating more attractive liveable cities, providing better access to finance and coming up with more creative home ownership models, including rent-to-own.

The study also takes a swipe at new laws enabling widespread medium-density residential development. It says while this is appropriate in smaller settlements there is serious risk it will create unsustainable patterns of growth. The emphasis should be on brownfields first, taking a high-density and transit-oriented approach which encourages densification in locations where the infrastructure exists to support it.

Affordability Ranking	City-District	Median House Price vs Median Household Income	Affordability Ranking	City-District	Median House Price vs Median Household Income
1	Grey District	3.6	34	Wellington City	7.3
2	Westland District	4.6	35	Waipa District	7.4
3	Gore District	4.6	36	Matamata-Piako District	7.4
4	Southland District	4.8	37	Whanganui District	7.5
5	Ashburton District	4.9	38	Gisborne District	7.6
6	Ruapehu District	5.0	39	Dunedin City	7.8
7	Buller District	5.0	40	Upper Hutt City	7.8
8	Waitomo District	5.0	41	New Plymouth District	7.8
9	Wairoa District	5.1	42	Central Otago District	7.9
10	Clutha District	5.2	43	Hamilton City	7.9
11	Invercargill City	5.2	44	Porirua City	7.9
12	Otorohanga District	5.2	45	Nelson City	7.9
13	Waimate District	5.3	46	Lower Hutt City	8.0
14	Timaru District	5.5	47	Hastings District	8.1
15	South Waikato District	5.6	48	Carterton District	8.1
16	South Taranaki District	5.8	49	Whakatane District	8.2
17	Tararua District	5.8	50	Taupo District	8.4
18	Selwyn District	5.9	51	Waikato District	8.4
19	Rangitikei District	6.0	52	Horowhenua District	8.5
20	Hurunui District	6.2	53	Hauraki District	8.5
21	Kaikoura District	6.2	54	Masterton District	8.6
22	Mackenzie District	6.3	55	Whangarei District	8.9
23	Manawatu District	6.4	56	Napier City	8.9
24	Waimakariri District	6.5	57	Tasman District	8.9
25	Waitaki District	6.5	58	Western Bay of Plenty District	9.1
26	Stratford District	6.6	59	South Wairarapa District	9.3
27	<b>Christchurch City</b>	<b>6.8</b>	60	Queenstown-Lakes District	9.4
28	Central Hawke's Bay District	6.9	61	Tauranga City	9.8
29	Marlborough District	6.9	62	Far North District	10.4
30	Opotiki District	6.9	63	Kapiti Coast District	10.5
31	Palmerston North City	7.0	64	Kaipara District	10.5
32	Rotorua District	7.0	65	Auckland	11.4
33	Kawerau District	7.1	66	Thames-Coromandel District	14.0



# CANTERBURY CONSTRUCTION REPORT<sup>©</sup>



**BLACKBURN**  
management

REGISTERED MASTER BUILDERS  
**ASSOCIATE  
MEMBER**

## MULTI-UNIT DEVELOPMENTS CHRISTCHURCH CITY



# Canterbury Construction Report<sup>©</sup>

## 2018 to 2022

### Multi-Unit Developments

### Christchurch City

Release date: January 2023  
This report is prepared by  
Blackburn Management Limited

The data used in this report has been taken from the  
Monthly Building Consent Reports and other information provided by:

Christchurch City Council  
Selwyn District Council  
Waimakariri District Council  
CoreLogic  
Statistics New Zealand

#### **Please Note:**

The analysis contained in this report is based on information that has been supplied by the above mentioned Territorial Authorities and data providers, which is released as a matter of public record.

Additional information and market commentary is sought and provided by industry participants.

Although all attempts are made to verify the data where possible, no representation is made by Blackburn Management, its agents or staff as to the accuracy of this information.

This report provides an analysis of the multi-unit residential construction market in Canterbury. It focuses on new residential dwellings.

This report excludes certain data relating to rest home facilities or elderly persons housing, sleepouts or secondary buildings and relocatable buildings (not being built for a specific site).

No information in this report is provided with respect to Kainga Ora.

Some residential consents are issued across multiple stages. Information relating to these building consent applications are only included when the final stage has been consented.

#### **Photographs, Images and Pictures**

All Photographs, Images and Pictures in this report are used with permission, or are without copyright restriction in the public domain.

# About this Report

This report looks at the development of new multi-unit residential construction in Christchurch.

It details new residential building consents issued in the City since 2018.

The purpose of this report is to provide a detailed analysis of the Multi-Unit market with the aim of giving a “wood for the trees” view point.

This report details the following information:

- Number of dwellings consented
- Cost of construction
- Size of dwellings
- Where these developments are being built (location maps)
- Population numbers
- Top applicants

The report is broken down into five main sections

- Executive Summary
- Introduction and Background and External Influences on the Market
- Analysis of the Market by Year (five years, 2022 back to 2018)
- Analysis of the market by Applicant (top 10 for 2022)
- Appendices and Data

Contents

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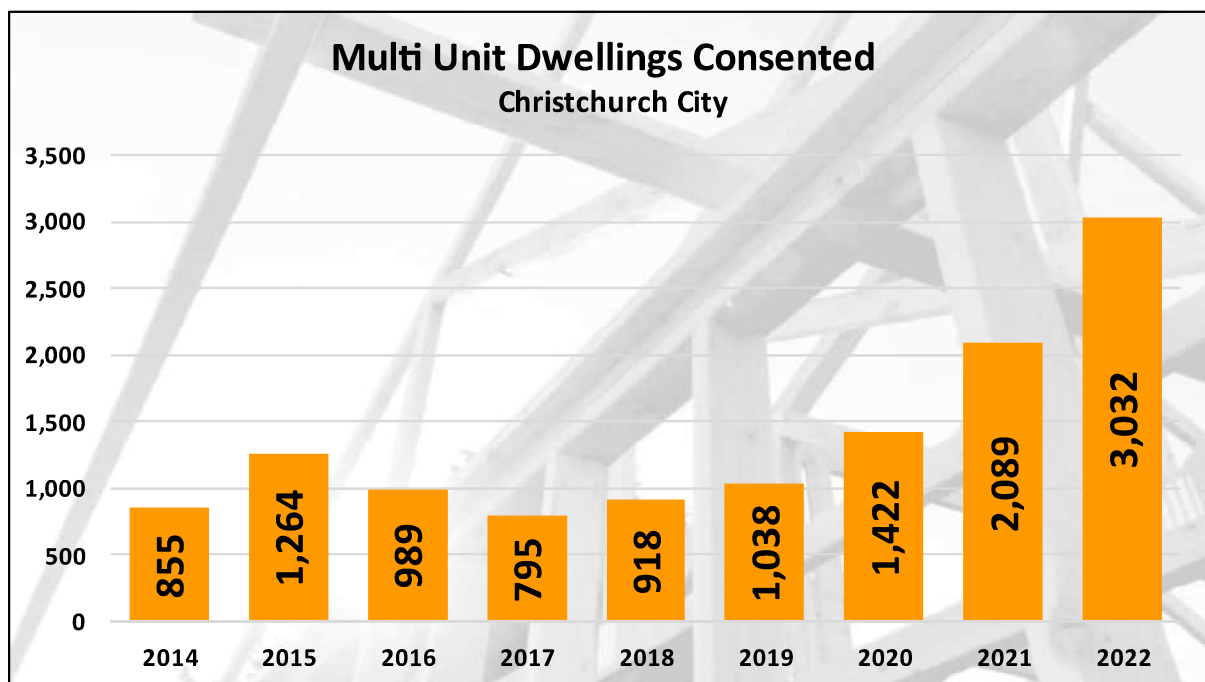
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## Executive Summary

I believe that the market for medium density multi-unit dwellings in Christchurch is currently oversupplied (I've been saying this for the past year).

I predict that the number of new residential units being consented in Christchurch in 2023 will fall by 20% to 30% over the next 12 to 18 months.

In the 12 months to December 2022 there were 3,032 multi-unit dwellings consented across 456 building consent applications (that's an average of 6.6 units per building consent application).



This is a 45% increase (943 units) over the 2,089 multi-unit dwellings consented in 2021.

Which was a 47% increase (667 units) over the 1,418 multi-unit dwellings consented in 2020.

New residential multi-units account for almost 7 out of 10 new dwellings consented across the City in 2022.

This has been a continuing trend since 2017.

The median size of these multi-unit dwellings is just 77 m<sup>2</sup> (on average, that's about 1.5 bedrooms).

The average household occupancy of Christchurch is 2.7 persons per household...you simply can't fit 2.7 people into a 1.5 bedroom unit (not as a short or medium term housing strategy for the City).

Over the past two years, the population of Christchurch has been in decline. Not by a tremendous amount, but it's definitely not growing (-0.5% in 2021 and -0.2% in 2022). Compare this to neighboring Selwyn (+5.0% in 2022) and Waimakariri (+2.0% in 2022).

You don't need more houses when your population is not growing (certainly not at the rate we have been building them over the past couple of years). To be fair...that's a very broad statement...but you get the idea.

Almost every builder and developer I have spoken to (pretty much from the start of 2022) has told me that unit sales are down (sales appear to be down across all parts of the market, including units, individual dwellings and sections).

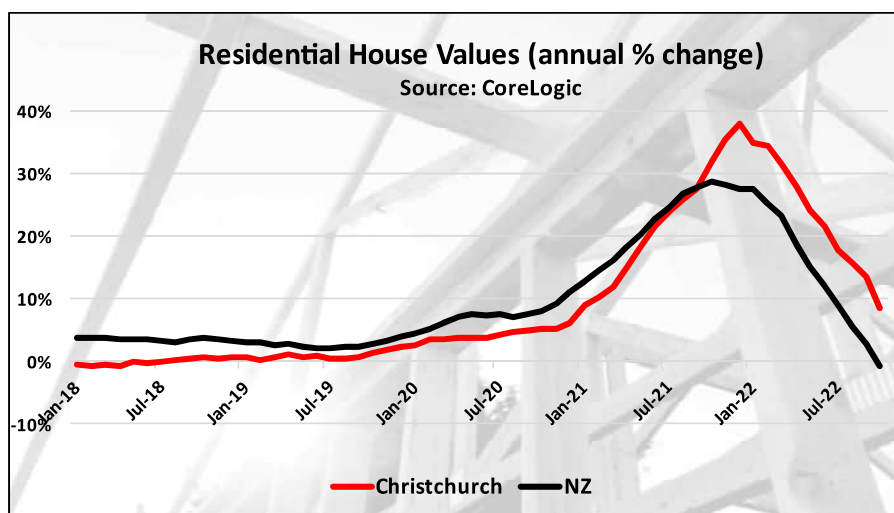
Many of the developments currently under construction were sold six or 12 months ago. With projects taking longer to sell in 2022, this will inevitably flow through to a slowdown in new building consents into 2023.

Property values aren't what they were this time last year (that's probably an understatement), but you could also argue that annual increases in value of 38.0% (December 2021, via CoreLogic) were never real and that values today aren't too far off what they would have been without the artificial bubble of 2021 and 2022.

I guess your point of view will depend on when and what you brought.

Unfortunately, this (and a projected ongoing increase in interest rates) will see a number of buyers (including builders and developers) now unable to settle these purchases, most likely forfeiting their deposit (and hopefully not much more) just to get out of the deal.

On-selling in a crowded market will further depress prices.



I suspect that the above graph probably looks like many developers sales charts.

Economically, it's going to be a tough year. A recession will make it harder to borrow money, which will be at higher interest rates. Developers will find it harder (than it already is) to find money for "spec" projects, which will inevitably be competing for fewer buyers (and most certainly, fewer investor buyers).

However, despite all of the above, it's not like the arse is going to completely fall out of the market.

Even if the market did come back by 30%, this still means that there would be somewhere around 2,000 new units consented across the city in 2023. This could still be a bit on the high side, given the limited population growth, but it often takes the building sector 12 months or more to catch up to the market.

We could see this decline continue through into 2024.

During the market crash of 2008 (following the Global Financial Crisis), building consent numbers dropped by around 45% over two years (before the earthquakes). Everything I have read and watched on in the pending economic recession suggests that 2023 won't be as bad as 2008...but how really knows?

I know many developers who are well prepared for this change in market conditions. The "writing has been on the wall" for anyone to see (if you were paying attention) for some time now. The market will slowdown...but we will keep on building, certainly not as many, but developers will adapt to the requirement of the market (what buyers want) and will change what, how many and where they build.

Unfortunately, this will be bad news for some developers who will need to redesign or potentially shelve some projects or (worst case scenario) look to sell out of others at a loss (again, on a crowded market). I expect that it will be a tough time for many builders and developers, with some not making it to the end of the year.

It's hard not to sound like the Grim Reaper, delivering this executive summary, but this is the state of the current market for multi-unit construction in Christchurch (and I suspect, across most of the Country).

In 2021, I issued a caution to the market, I am now upgrading that to a warning.

Anyone, working in, or building in, or investing in, or supplying to this market should read this report. It will change / crystallise your thinking on business for the coming year.

As always, I appreciate your comments and views on this report and the broader market.

Please give me a call if you have any questions.

A handwritten signature in blue ink that reads "Mike Blackburn". The signature is written in a cursive style and is underlined with a single horizontal line.

Mike Blackburn  
January 2023.

## Key market indicators for 2023

### Sales for new units will remain slow

In 2022, sales for new residential multi-unit dwellings fell significantly. 2023 should see a continued decline in demand.



### Interest rates will continue to increase

The Reserve Bank has forecast ongoing increases in the Official Cash Rate. This will see the demand for new mortgages decline.



### Inflation will remain high

The flow on effect to the construction industry is that buyers will have less money to spend and the cost of building materials and services will go up.



### It will be harder to get mortgage and development finance

The tighter lending market continues to make it difficult for first home buyers, investors and developers to borrow money.



### Cost of construction will continue to increase

On top of high inflation, the new H1 (Healthy Homes) Regulations apply from this year. This could add 20% to 30% to the cost of construction.



### Population growth in Christchurch will be lower than its neighbours

The Christchurch population is declining (only slightly, -0.5% in 2021 and -0.2% in 2022), while Selwyn (+5% in 2022) and Waimakariri (+2%) continue to grow.



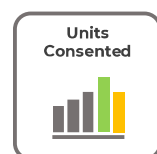
### Many development sites are being redesigned, put on hold or sold

With sales much harder to find, developers are considering what to do with sites they own or have options on. Delays and changes are inevitable.



### The number of new units being consented will fall by up to 30%

Its only a matter of time (sooner rather than later) that the slow sales in 2022 will flow through a reduction in the number of building consent applications for multi-unit developments.



The real questions... is by how much will numbers fall?

For a full analysis of all building consent applications and related information please read this report in association with the accompanying spreadsheet.

**Additional and specialist analysis is available on request.**

## CONTACT US



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# 3

**WHAT IS NEIGHBOURHOOD CHARACTER?**

## 3.1 DEFINITION

The concept of Neighbourhood Character, its components and its value has been widely discussed and debated over the last ten years in Victorian planning. It has been demonstrated well that neighbourhood character is something that can have a range of meanings for different people or situations and is difficult to define.

In the neighbourhood character studies that Planisphere has undertaken, we have attempted to arrive at a definition of neighbourhood character to form the basis of our study methodology. This understanding of what constitutes neighbourhood character has been developed over the course of many studies and collaboration with local communities, Councils, the former Department of Infrastructure (DOD), the Department of Sustainability and Environment (DSE), and the Department of Planning and Community Development (DPCD).

The purpose of this chapter is to provide the reader with a clear understanding of Neighbourhood Character: What does it mean; how is it practically administered within the statutory framework; what are the principles of Neighbourhood Character; and what are Neighbourhood Character typologies?

### WHAT IS NEIGHBOURHOOD CHARACTER?

In December 2001, the former Department of Infrastructure published a General Practice Note titled 'Understanding Neighbourhood Character'. The Note contains useful information, however it fails to provide a single, all-encompassing and concise definition of neighbourhood character. Perhaps the most succinct definition provided in the document is that 'neighbourhood character is essentially the combination of the public and private realms'. The document suggests a number of factors as relevant, which to the reader may appear to obscure, rather than illuminate, the essence of neighbourhood character. Yet there have been useful previous statements on this subject, either auspiced by the former Department of Infrastructure, or produced by independent panels.

A more succinct and encompassing definition were included in the Draft Practice Note on Neighbourhood Character published in June 2000 as part of the first draft of ResCode:

*Neighbourhood character is the interplay of natural, built social, cultural and economic conditions that make one place different from another.*

This definition is helpful, but it has a number of weaknesses:

The focus does not remain on the meaning of neighbourhood character that is reflected in tools provided in the Victoria Planning Provisions (VPPs).

The adjective 'qualitative' is excluded when using the term 'interplay'.

The reference to 'combination of the public and private realms', which is in the current Practice Note, is not included.

It is true that people attribute widely differing meanings to the term 'neighbourhood character'. For many, character is about the people who live in the area; for others it is broad attributes of the area, such as closeness to shops or transport, how much open space or traffic there is. Because this character study has been commissioned to provide planning scheme policies and controls, it needs to be focussed on the physical planning outcomes that are capable of being influenced by planning scheme tools. Fundamentally we are aiming to answer the question: how do buildings and landscape interact? Built form, vegetation and topographical characteristics are the physical manifestation of neighbourhood character addressed in the VPPs. The former Good Design Guide used these terms in defining neighbourhood character.

The term 'interplay' in the former Practice Note comes from the 1998 Advisory Committee report on the City of Monash neighbourhood character 'local variations' amendment. Monash have amended their Scheme to include the Monash Neighbourhood Character study, and have also made changes to the Schedule of the Residential 1 Zone.

The Monash report coined the phrase 'qualitative interplay'. Qualitative interplay refers to the way that the main distinctive



components of an area's character combine to produce a particular sense of place. This concept carries important implications:

Neighbourhood character needs to be described in a written character statement; it is insufficient to simply produce a catalogue or list of characteristics.

Character statements must be skilfully written to describe the synthesis of qualities that make one area distinct from another.

Character statements should make clear which characteristics are most important, and the manner in which they relate to each other.

The term 'qualitative interplay' transcends 'private and public domains', as the Monash report emphasises. The character of buildings and their grounds cannot be divorced from the character of the street scene in which they sit. For example, in the inner suburbs of Melbourne buildings often present as solid 'walls' to the street, producing a hard, urban character. In some landscape-dominated areas on the urban fringe, natural bush vegetation flows across private property and public domain alike, only stopping at the edge of the roadway. Clearing all the trees on a private allotment would completely change the character of this type of area. So would the construction of kerb, channel and footpath, or planting of street trees of an incompatible species or in a formal pattern.

Therefore, in summary, neighbourhood character is a synthesis of public and private domain characteristics, as listed in the provisions of ResCode. It is the qualitative interplay between those characteristics that make a place, town or neighbourhood distinctive. Some of these characteristics are more important than others in creating a distinctive character.

Surveying all characteristics, then listing the 'key' characteristics, is a useful analytical tool. However a written statement that explains the interplay of the character components is necessary to properly describe, assess and evaluate the character of a particular area. This is the theoretical and statutory basis for the Preferred Character

Statements that have been drafted for each precinct within the study area (as detailed in Section 4).

The following definition of neighbourhood character, used by a former Department of Infrastructure working party into neighbourhood character that met in late 1999, seems to us to accommodate all of these requirements. It forms the basis of the work undertaken in this Neighbourhood Character Study:

*Neighbourhood character is the qualitative interplay of built form, vegetation and topographic characteristics, in both the private and public domains that make one place different from another.*

### NEIGHBOURHOOD CHARACTER ELEMENTS

In many areas, building type, era and spacing, the proportions and combined appearance of the 'walls' and 'floor' of the street space, and the amount and type of vegetation, are the key determinants of the area's character. How the buildings 'sit' in their landscape is critical. Vegetation includes street trees, front garden vegetation, and canopy trees in rear yards and public reserves forming a backdrop. Critical elements of the 'walls' and 'floor' of the street space are the height, permeability and profile of the 'walls': the depth of front setbacks; type of garden (eg lawn and roses, shrubs and trees, or an apparent continuation of the street space planting); presence and permeability of a front fence; and the formality (or otherwise) of the street space.

Other character components can include traffic, noise, type of activity, and demographic characteristics. Members of the public often cite these as important characteristics of their neighbourhood. People often raise amenity issues such as access to open space in character consultation sessions. All of these can be argued to be an essential part of an area's character.

### FOCUSSING ON PLANNING SCHEME IMPLEMENTATION OPTIONS

The important question in each case is how relevant is this to the task in hand? In preparing policy and controls for implementation through the planning scheme, the focus of the study needs to be on

elements that are mentioned in either ResCode provisions or overlay controls and can therefore be addressed and influenced by the appropriate statutory tools. Many neighbourhood character elements can be addressed through other mechanisms such as social development strategies or public awareness campaigns that are outside the scope of planning schemes.

### **NEIGHBOURHOOD CHARACTER IS NOT**

The differentiation between different types of character areas is not simply a question of architectural style or era of development. Neighbourhood character is also founded on the siting and building form of the area, and the way that the buildings interact with and relate to the landscape. These factors should be the basis for the application of neighbourhood character policies. Neighbourhood character is not about the imposition of design styles. Rather it should be about recognising the distinctive characteristics of different urban forms, and their relationship to topography and vegetation. Getting this right is the best way of maintaining and enhancing the sense of place of the municipality's residential areas.

Neighbourhood character is not about the amenity of adjoining properties or dwelling densities as such, although it has implications for both of these issues. In practical terms it does not dictate planning controls for either. For example, the recommended guidelines contained in the area papers with regard to spaciousness between dwellings may require that new buildings should be setback from both side boundaries. This may reduce the amount of buildings that can be accommodated on a site, and may also reduce potential amenity impacts from overlooking and overshadowing of adjoining properties. Front setback controls may also have a similar effect in some instances. These are secondary outcomes of the neighbourhood character guidelines, and whilst not the primary intent, may reduce community concerns about other aspects of new development.

Character is not about density controls. ResCode makes no provision for density controls, and it is not considered that a policy which proposed density maximums or medium density housing saturation levels would be supported by the DPCD. ResCode has more

extensive provisions relating to amenity issues and it is likely that once these provisions become more widely implemented many amenity concerns will be reduced.

### **HOW DOES NEIGHBOURHOOD CHARACTER DIFFER FROM HERITAGE?**

Character and heritage share many attributes, but there are important differences between the two concepts.

The basis of neighbourhood character is that every place has character, regardless of its age or appearance. However, some areas may be considered to have a more significant character than others. There are no set criteria for assessing the significance of neighbourhood character. Community feedback is an important means by which the value of character can be understood and community values are a key justification for its protection. In some areas, policies to improve or transform character may be appropriate.

While all areas have a history or heritage, actual heritage significance is determined by assessment against statutory criteria. The criteria is set out in the Burra Charter and embodied in legislation. Heritage studies designate levels of significance for sites or precincts by assessment against these criteria by way of comparison with other heritage places.

As previously noted, character studies principally evaluate the interplay of built form, vegetation and topographical qualities, with reference to the style and age of buildings where relevant. Heritage studies evaluate cultural heritage significance. This may include some reference to built form, vegetation and topographical qualities. However, it is more concerned with understanding how a particular place represents the history and evolution of an area and the people who have lived there or activities that have taken place.

## 3.2 CHARACTER PRINCIPLES

The following principles of neighbourhood character were prepared by a former Department of Infrastructure working party into neighbourhood character that met in late 1999. They were included in the Draft Practice Note on Neighbourhood Character published in June 2000 as part of the first draft of ResCode. These form the basis of the process and content of the work undertaken by Planisphere for neighbourhood character studies. The principles are:

### COMMUNITY VALUES

*The values of the local community are part of determining the appropriate response to neighbourhood character. Planning controls that aim to protect, change or improve character must draw on professional and community views.*

The community should be involved in identifying the neighbourhood character measures appropriate to their area. Professionals assist in developing and translating these ideas into techniques to manage design.

### PHYSICAL FOCUS

*Character, in its broadest sense, can include environmental, social and economic factors, but the planning system is concerned with managing the physical evidence of character and related social impacts.*

The planning system is primarily focussed on achieving a wide range of objectives through the physical environment. Character is not concerned only with the private domain, as much of neighbourhood character is manifested in the public street space. However, some character issues are related to social outcomes or impacts. For example, the height of front fences is a town planning issue with character implications that may be physical (does a high fence contribute positively to the 'look' of the area?) and social (how do high fences affect social interaction?).

### SPECIAL QUALITIES OF AN AREA

*All areas have a character that can be described, evaluated and, in many cases, improved. In some areas protection of particular qualities may be warranted.*

The aim in placing greater priority on character is to improve the quality of the environment throughout Victoria's residential areas. For this reason, neighbourhood character is equally relevant everywhere. Planning controls should aim to protect identified distinctive and valued elements.

### INTERACTION BETWEEN ELEMENTS OF CHARACTER

*Character is about the interrelationships between various elements of an area, and so cannot be described or evaluated by considering individual elements in isolation.*

Design responses need to consider the whole picture of a neighbourhood, rather than focussing upon one or two elements of the building form or siting.

### NEIGHBOURHOOD CHARACTER AND OTHER PLANNING POLICIES

*State and Council policies provide the rationale for decisions about whether to protect, change or improve the neighbourhood character of an area. Area-specific controls should be developed in the light of these strategic directions.*

A Council's Municipal Strategic Statement will provide guidance about priorities in any particular area. Local housing issues and other State planning policy directions such as focusing higher density development around activity centres will be important considerations.

### PREFERRED CHARACTER

*Neighbourhood character descriptions and evaluations should focus on the preferred character of an area.*

Descriptions of existing characteristics are an important part of the process of identifying the 'starting point', but the desired character

needs to be evaluated and considered in the context of other policy priorities. It may be that some areas should be encouraged to develop a new character, just as there may be some areas where critical elements need to be protected or reflected in all new development. The concept of preferred character is discussed in detail in Section 4.

### NEIGHBOURHOOD CHARACTER TYPOLOGIES

*There are a limited number of consistent precinct types that can be defined, and frequently appropriate policy responses can be formulated without the need for expensive studies.*

The 'Responding to Neighbourhood Character' ResCode Practice Note has adopted this approach in presenting possible policy responses to three typical residential character types. This is not to say that detailed analysis can be completely avoided, but much can be gained from shared understandings. Many councils have undertaken very detailed character studies and this information may supplement the examples provided.

### SITE ANALYSIS

*A site analysis, specifically from the neighbourhood character perspective, is necessary whether or not a detailed character study has been undertaken.*

A site analysis is necessary to identify characteristics that might be unusual or particular to the locality. This may not prescribe the answer, but inform the decision. A site analysis should be undertaken as part of the development assessment process. This is discussed in detail in the Implementation section.

### CHARACTER AND HERITAGE

*Character and heritage share many attributes, but there are important differences between the two concepts. Community values are a key justification for the protection of neighbourhood character. Policies to transform character may be appropriate in some areas.*

Character studies evaluate the interplay of built form, vegetation and topographical qualities, with reference to styles and ages where relevant, whereas heritage studies evaluate cultural heritage significance, with some reference to built form, vegetation and topographical qualities. Heritage studies designate levels of significance for sites or precincts by assessment against established criteria and by way of comparison with other heritage places. The basis of neighbourhood character is that every place has character regardless of its age or appearance and community feedback is an important means by which the value of this character can be understood.

### CHARACTER AND AMENITY

*The difference between neighbourhood character and amenity must be recognised.*

Character and amenity are terms often used interchangeably, but issues of immediate impacts on adjoining properties like visual and acoustic privacy and overshadowing should continue to be treated as issues separate to neighbourhood character.

## 3.3 CHARACTER TYPES

### FOUR NEIGHBOURHOOD CHARACTER TYPES OF VICTORIA

Neighbourhood character is a fundamental of sense of place in residential communities. While many councils have undertaken neighbourhood character studies, little or no attempt has been made to generalise the findings of these studies into a typology of neighbourhood character types. Broadly speaking, the following neighbourhood character types have been identified across Victoria:

**TABLE 1 VICTORIAN NEIGHBOURHOOD CHARACTER TYPES**

BUILT FORM / LANDSCAPE RELATIONSHIP	CHARACTER TYPE
Built form dominated residential areas	'Inner Urban'
Spacious residential areas in a garden setting (formal street pattern, generally modified grid)	'Garden Suburban'
Spacious residential areas in a garden setting (informal, generally curving street pattern with courts/cul-de-sacs)	'Garden Court'
Landscape dominated residential areas	'Bush Suburban'

These four broad categories illustrate the four main types of residential areas that exist in Victoria, from an urban design perspective. The differentiation between these types is not based on architectural style or era of development. It is founded on the layout and form of the areas, and the way that the built form interacts with and relates to the landscape. These factors should be the basis for the application of neighbourhood character policies. Neighbourhood character is not about the imposition of design styles. Rather it should be about recognising the distinctive characteristics of different urban forms, and their relationship to topography and vegetation. Getting this right is the best way of maintaining and enhancing the sense of place of the state's residential areas.

An initial version of these character types, prepared by Planisphere, was included in the Draft Practice Note on Neighbourhood Character published in June 2000 as part of the first draft of ResCode. Although this Practice Note has since been superseded, it provided some useful principles about the nature of neighbourhood character. The upgraded version of the character types shown here is included in *Sense of Place: urban design principles for the Metropolitan Strategy*, a technical report on urban design prepared by Planisphere and published in October 2002 as part of the Metropolitan Strategy.

Within each of these four main character types, there can be wide variations. They are important in differentiating the character of one neighbourhood from another, and in creating or strengthening a sense of place. These variations are identified through the character survey, and are highlighted in the "Precinct Descriptions" of each Precinct Profile (refer to Appendices).

### LOCAL NEIGHBOURHOOD CHARACTER TYPES

The following distinct character types were identified for Moonee Valley:

**TABLE 2 MOONEE VALLEY NEIGHBOURHOOD CHARACTER TYPES**

BUILT FORM / LANDSCAPE RELATIONSHIP	CHARACTER TYPE
Architecturally diverse areas within activity centre boundaries.	Central Residential
Built form dominated residential areas with generally traditional streetscapes, and modest lot sizes.	Inner Urban
Built form dominated residential areas with contemporary streetscapes.	Urban Contemporary
Spacious residential areas in a garden setting (formal street pattern, generally modified grid)	Garden Suburban

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Spacious residential areas in a garden setting      Garden Court  
(informal, generally curving street pattern with  
courts/cul-de-sacs)

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These areas were defined through the interactions between the built form, street patterns and the surrounding landscape. These features were found to heavily contribute towards the valued character and nature of each precinct.

## AREAS WITH NEW AND CHANGING CHARACTER

Some areas are subject to redevelopment, or have aspects of their character that are a cause of strong concern by local people, warranting change to the physical fabric. In both these instances, the appropriate planning strategy may well be to try to improve the character of the area by changing it. Achieving a measured and consistent change in the new development character of an area requires a sound approach to planning. Definition of the new character will often require urban design skills, and the process of managing change may require a sophisticated program with community involvement.

Areas yet to be developed should be allowed to create a new character within broader parameters, such as relating to the built character of adjoining areas and expressing the underlying landscape character.

## CHARACTER TYPES

### INNER URBAN

*Built form dominated residential areas. Examples: Melbourne's inner suburbs (eg. Carlton, Fitzroy, Port Melbourne, Williamstown)*

This intensive form of subdivision, much of it into small, narrow blocks, resulted in a built form dominated character. This type of character is widespread in Melbourne's inner suburbs, but unusual outside Melbourne, except in the centre of some older regional

centres and country towns such as Bendigo and surrounding settlements. Some of these areas were subject to a planned approach, with formal street layouts and a more effective control of land release subdivision. Others grew more haphazardly, with streets of varying width, including many very narrow streets, often without connectivity, and no provision for parks and squares.

Our view of the inner suburbs of Melbourne and regional centres as living environments has been transformed in the last forty years. Originally the focus of slum clearance policies, they have since become desirable residential locations, valued for the urban lifestyle and heritage qualities. Urban designers see them as exemplars of a more sustainable urban form.

**TABLE 3 INNER URBAN CHARACTER TYPE SUMMARY**

DESCRIPTION	MAIN CHARACTERISTICS	PRINCIPLES
Dense, low rise residential mixed use areas serviced by strip centres.	Highly urban character with buildings dominating the street scene.	Continue to conserve the heritage areas.
Largely intact Victorian colonial suburbs of high heritage value (probably world significance) associated with the rise of Marvellous Melbourne.	Low rise scaled, narrow fronted rhythm.  Small front setbacks, small or zero side setbacks, create unbroken 'walls' to the street.	Maintain and enhance the hard urban character, with its solid, fine-grain streetscape 'walls', dense, connected street and laneway networks, minimal setbacks, and pedestrian friendly environment.
A walking, horse-drawn carriage and tram-based city.	Front property boundary always expressed by a fence.  Possibility of siting new, more intense development so that it is 'hidden' from view.	
In outer areas, land sometimes remained undeveloped for decades, leading to mixed eras of	Fine-grained, connected street and laneway pattern, highly conducive to walking and cycling.  Served by relatively dense	

DESCRIPTION	MAIN CHARACTERISTICS	PRINCIPLES
development (eg. Northcote)	network of strip activity centres and public transport services.  Many areas of mixed use.	

### GARDEN SUBURBAN

*Spacious residential areas in a garden setting (formal street pattern, generally modified grid). Examples: the Melbourne middle suburbs (eg. Camberwell, Essendon, Sunshine).*

The middle suburbs of Melbourne are possibly what most people have in mind when they talk about Melbourne's comfortable 'liveability', and compare its suburbs favourably as living environments with the affordable equivalents in Sydney. The middle suburbs became the crucible of the protests relating to urban consolidation, the Good Design Guide and neighbourhood character in the 1990s. Outside Melbourne, most urban residential areas have the spacious 'garden suburban' character, because densities and site coverage tend to be lower than equivalent metropolitan areas.

Most garden suburban residential areas are laid out within a north-south, east-west grid of one chain (20m) main roads (more likely to be 30m in regional Victoria). Mostly the street pattern is grid-based or grid-adapted. The roads are tree-lined avenues, often with concrete kerbs and footpaths, and grassed nature strips. Some housing has low walls fronting formal, trimmed gardens that are open to the street, and houses are located within the lot, rather than extending to its boundaries. The atmosphere of a garden suburb is one of space and trees, though the separation of private and public land is clearly defined.

**TABLE 4 GARDEN SUBURBAN CHARACTER TYPE SUMMARY**

DESCRIPTION	MAIN CHARACTERISTICS	PRINCIPLES
Train and tram based.	Spacious feel: space around and between buildings, open	Use a formal approach to street

DESCRIPTION	MAIN CHARACTERISTICS	PRINCIPLES
Late Victorian to 1960s / 70s.	rather than enclosed street space, large setbacks	space design (eg regular avenues of trees, regular geometry of kerbing and traffic management devices)
Grid-based street pattern.	Green and leafy appearance in many areas	Retain the spacious, green and leafy character, including views of backdrop vegetation between and over buildings, generous front garden setbacks open to view from the street, and grassed nature strip with minimal interruption
Spacious streets and gardens.	Low scale, dominant roof forms, strong horizontal emphasis	Maintain the horizontal emphasis of massing and form resulting from the dominance of the roof form
Detached houses, double or triple fronted.	Gaps between buildings	
Footpaths and nature strips and tree avenues (often exotic).	Front property boundary usually defined by low, solid fence or moderate height 'transparent' fence (eg wire mesh)	
Car storage		

### GARDEN COURT

*Spacious residential areas in a garden setting (informal, generally curving street pattern with courts/cul-de-sacs). Examples: Melbourne outer suburbs such as Chirnside Park, Wantirna, Carrum Downs.*

From the 1960s to present time, garden court residential areas have emerged. They grew faster in the north-east, east and south-east than in the north, north-west and west Melbourne. These suburbs have grown on the fringes of Melbourne and other centres, where initially infrastructure and services were inadequate.

The term Garden Court refers to the combination of a Garden Suburban type of development superimposed on a pattern of curvilinear streets with cul-de-sacs or courts. This layout was designed to accommodate full car-based access as safely as possible, by eliminating ‘rat runs’ and providing low speed, low volume traffic environments within the courts. A negative consequence of this type of layout has been the poor connectivity of the street system for bus routes and walking.

These areas tend to be associated with car-based, stand alone retail centres. In seeking to create more sustainable urban environments, government policy will need to address these deficiencies over the long term.

The curvilinear street pattern results in the creation of informal street spaces which are often complimented by informal (often native) garden planting. There is often only one footpath, sometimes none at all.

More recent trends in Garden Court areas have seen reduced setback and road width standards, coupled with substantially increasing site coverage. Many estates of the 1990s include large numbers of two storey houses with much reduced setbacks. These changes have reduced the ‘garden’ aspect of the character, increasing the sense that the street is lined by a solid ‘wall’ of buildings. Although street and garden trees will eventually mature and ‘soften’ these streetscapes, they will continue to have a more built-form dominated character.

**TABLE 5 GARDEN COURT CHARACTER TYPE SUMMARY**

DESCRIPTION	MAIN CHARACTERISTICS	PRINCIPLES
Car-based 1960s/70s onwards	Pre-1990s: spacious feel – space around and between buildings, open rather than enclosed street space, large setbacks	Use an informal approach to street space design (eg informal groupings of trees, irregular geometry of kerbing and traffic
Curvilinear plus court-based street pattern	From the 1990s: a more enclosed feel due to smaller	

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gardens	setbacks, higher site coverage and two storey development	management devices)
Detached houses, double or triple fronted	Green and leafy appearance in many areas	Retain the spacious, green and leafy character, including views of backdrop vegetation between and over buildings, generous front garden setbacks open to view from the street, and grassed nature strip with minimal interruption
Two storey houses and higher site coverage common from 1990s	Low scale and horizontal emphasis of dominant roofs (pre-1990s)	
Nature strips, often without footpaths	Gaps between buildings (less from 1990s)	
Informal street tree planting, often native	Less emphasis on separate definition of public and private domain: front gardens often not fenced	In pre-1990s areas, maintain the horizontal emphasis of massing and form resulting from the dominance of the roof form
Car storage usually off-street and behind the building line (in front of the building line in some more recent estates)		
Car-based, stand alone retail centres		



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## APPENDIX A

elements that are mentioned in either ResCode provisions or overlay controls and can therefore be addressed and influenced by the appropriate statutory tools. Many neighbourhood character elements can be addressed through other mechanisms such as social development strategies or public awareness campaigns that are outside the scope of planning schemes.

### **NEIGHBOURHOOD CHARACTER IS NOT**

The differentiation between different types of character areas is not simply a question of architectural style or era of development. Neighbourhood character is also founded on the siting and building form of the area, and the way that the buildings interact with and relate to the landscape. These factors should be the basis for the application of neighbourhood character policies. Neighbourhood character is not about the imposition of design styles. Rather it should be about recognising the distinctive characteristics of different urban forms, and their relationship to topography and vegetation. Getting this right is the best way of maintaining and enhancing the sense of place of the municipality's residential areas.

Neighbourhood character is not about the amenity of adjoining properties or dwelling densities as such, although it has implications for both of these issues. In practical terms it does not dictate planning controls for either. For example, the recommended guidelines contained in the area papers with regard to spaciousness between dwellings may require that new buildings should be setback from both side boundaries. This may reduce the amount of buildings that can be accommodated on a site, and may also reduce potential amenity impacts from overlooking and overshadowing of adjoining properties. Front setback controls may also have a similar effect in some instances. These are secondary outcomes of the neighbourhood character guidelines, and whilst not the primary intent, may reduce community concerns about other aspects of new development.

Character is not about density controls. ResCode makes no provision for density controls, and it is not considered that a policy which proposed density maximums or medium density housing saturation levels would be supported by the DPCD. ResCode has more

extensive provisions relating to amenity issues and it is likely that once these provisions become more widely implemented many amenity concerns will be reduced.

### **HOW DOES NEIGHBOURHOOD CHARACTER DIFFER FROM HERITAGE?**

Character and heritage share many attributes, but there are important differences between the two concepts.

The basis of neighbourhood character is that every place has character, regardless of its age or appearance. However, some areas may be considered to have a more significant character than others. There are no set criteria for assessing the significance of neighbourhood character. Community feedback is an important means by which the value of character can be understood and community values are a key justification for its protection. In some areas, policies to improve or transform character may be appropriate.

While all areas have a history or heritage, actual heritage significance is determined by assessment against statutory criteria. The criteria is set out in the Burra Charter and embodied in legislation. Heritage studies designate levels of significance for sites or precincts by assessment against these criteria by way of comparison with other heritage places.

As previously noted, character studies principally evaluate the interplay of built form, vegetation and topographical qualities, with reference to the style and age of buildings where relevant. Heritage studies evaluate cultural heritage significance. This may include some reference to built form, vegetation and topographical qualities. However, it is more concerned with understanding how a particular place represents the history and evolution of an area and the people who have lived there or activities that have taken place.

## 3.2 CHARACTER PRINCIPLES

The following principles of neighbourhood character were prepared by a former Department of Infrastructure working party into neighbourhood character that met in late 1999. They were included in the Draft Practice Note on Neighbourhood Character published in June 2000 as part of the first draft of ResCode. These form the basis of the process and content of the work undertaken by Planisphere for neighbourhood character studies. The principles are:

### COMMUNITY VALUES

*The values of the local community are part of determining the appropriate response to neighbourhood character. Planning controls that aim to protect, change or improve character must draw on professional and community views.*

The community should be involved in identifying the neighbourhood character measures appropriate to their area. Professionals assist in developing and translating these ideas into techniques to manage design.

### PHYSICAL FOCUS

*Character, in its broadest sense, can include environmental, social and economic factors, but the planning system is concerned with managing the physical evidence of character and related social impacts.*

The planning system is primarily focussed on achieving a wide range of objectives through the physical environment. Character is not concerned only with the private domain, as much of neighbourhood character is manifested in the public street space. However, some character issues are related to social outcomes or impacts. For example, the height of front fences is a town planning issue with character implications that may be physical (does a high fence contribute positively to the 'look' of the area?) and social (how do high fences affect social interaction?).

### SPECIAL QUALITIES OF AN AREA

*All areas have a character that can be described, evaluated and, in many cases, improved. In some areas protection of particular qualities may be warranted.*

The aim in placing greater priority on character is to improve the quality of the environment throughout Victoria's residential areas. For this reason, neighbourhood character is equally relevant everywhere. Planning controls should aim to protect identified distinctive and valued elements.

### INTERACTION BETWEEN ELEMENTS OF CHARACTER

*Character is about the interrelationships between various elements of an area, and so cannot be described or evaluated by considering individual elements in isolation.*

Design responses need to consider the whole picture of a neighbourhood, rather than focussing upon one or two elements of the building form or siting.

### NEIGHBOURHOOD CHARACTER AND OTHER PLANNING POLICIES

*State and Council policies provide the rationale for decisions about whether to protect, change or improve the neighbourhood character of an area. Area-specific controls should be developed in the light of these strategic directions.*

A Council's Municipal Strategic Statement will provide guidance about priorities in any particular area. Local housing issues and other State planning policy directions such as focusing higher density development around activity centres will be important considerations.

### PREFERRED CHARACTER

*Neighbourhood character descriptions and evaluations should focus on the preferred character of an area.*

Descriptions of existing characteristics are an important part of the process of identifying the 'starting point', but the desired character

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needs to be evaluated and considered in the context of other policy priorities. It may be that some areas should be encouraged to develop a new character, just as there may be some areas where critical elements need to be protected or reflected in all new development. The concept of preferred character is discussed in detail in Section 4.

### NEIGHBOURHOOD CHARACTER TYPOLOGIES

*There are a limited number of consistent precinct types that can be defined, and frequently appropriate policy responses can be formulated without the need for expensive studies.*

The 'Responding to Neighbourhood Character' ResCode Practice Note has adopted this approach in presenting possible policy responses to three typical residential character types. This is not to say that detailed analysis can be completely avoided, but much can be gained from shared understandings. Many councils have undertaken very detailed character studies and this information may supplement the examples provided.

### SITE ANALYSIS

*A site analysis, specifically from the neighbourhood character perspective, is necessary whether or not a detailed character study has been undertaken.*

A site analysis is necessary to identify characteristics that might be unusual or particular to the locality. This may not prescribe the answer, but inform the decision. A site analysis should be undertaken as part of the development assessment process. This is discussed in detail in the Implementation section.

### CHARACTER AND HERITAGE

*Character and heritage share many attributes, but there are important differences between the two concepts. Community values are a key justification for the protection of neighbourhood character. Policies to transform character may be appropriate in some areas.*

Character studies evaluate the interplay of built form, vegetation and topographical qualities, with reference to styles and ages where relevant, whereas heritage studies evaluate cultural heritage significance, with some reference to built form, vegetation and topographical qualities. Heritage studies designate levels of significance for sites or precincts by assessment against established criteria and by way of comparison with other heritage places. The basis of neighbourhood character is that every place has character regardless of its age or appearance and community feedback is an important means by which the value of this character can be understood.

### CHARACTER AND AMENITY

*The difference between neighbourhood character and amenity must be recognised.*

Character and amenity are terms often used interchangeably, but issues of immediate impacts on adjoining properties like visual and acoustic privacy and overshadowing should continue to be treated as issues separate to neighbourhood character.

### 3.3 CHARACTER TYPES

#### FOUR NEIGHBOURHOOD CHARACTER TYPES OF VICTORIA

Neighbourhood character is a fundamental of sense of place in residential communities. While many councils have undertaken neighbourhood character studies, little or no attempt has been made to generalise the findings of these studies into a typology of neighbourhood character types. Broadly speaking, the following neighbourhood character types have been identified across Victoria:

**TABLE 1 VICTORIAN NEIGHBOURHOOD CHARACTER TYPES**

BUILT FORM / LANDSCAPE RELATIONSHIP	CHARACTER TYPE
Built form dominated residential areas	'Inner Urban'
Spacious residential areas in a garden setting (formal street pattern, generally modified grid)	'Garden Suburban'
Spacious residential areas in a garden setting (informal, generally curving street pattern with courts/cul-de-sacs)	'Garden Court'
Landscape dominated residential areas	'Bush Suburban'

These four broad categories illustrate the four main types of residential areas that exist in Victoria, from an urban design perspective. The differentiation between these types is not based on architectural style or era of development. It is founded on the layout and form of the areas, and the way that the built form interacts with and relates to the landscape. These factors should be the basis for the application of neighbourhood character policies. Neighbourhood character is not about the imposition of design styles. Rather it should be about recognising the distinctive characteristics of different urban forms, and their relationship to topography and vegetation. Getting this right is the best way of maintaining and enhancing the sense of place of the state's residential areas.

An initial version of these character types, prepared by Planisphere, was included in the Draft Practice Note on Neighbourhood Character published in June 2000 as part of the first draft of ResCode. Although this Practice Note has since been superseded, it provided some useful principles about the nature of neighbourhood character. The upgraded version of the character types shown here is included in *Sense of Place: urban design principles for the Metropolitan Strategy*, a technical report on urban design prepared by Planisphere and published in October 2002 as part of the Metropolitan Strategy.

Within each of these four main character types, there can be wide variations. They are important in differentiating the character of one neighbourhood from another, and in creating or strengthening a sense of place. These variations are identified through the character survey, and are highlighted in the "Precinct Descriptions" of each Precinct Profile (refer to Appendices).

#### LOCAL NEIGHBOURHOOD CHARACTER TYPES

The following distinct character types were identified for Moonee Valley:

**TABLE 2 MOONEE VALLEY NEIGHBOURHOOD CHARACTER TYPES**

BUILT FORM / LANDSCAPE RELATIONSHIP	CHARACTER TYPE
Architecturally diverse areas within activity centre boundaries.	Central Residential
Built form dominated residential areas with generally traditional streetscapes, and modest lot sizes.	Inner Urban
Built form dominated residential areas with contemporary streetscapes.	Urban Contemporary
Spacious residential areas in a garden setting (formal street pattern, generally modified grid)	Garden Suburban

---

Spacious residential areas in a garden setting      Garden Court  
(informal, generally curving street pattern with  
courts/cul-de-sacs)

---

These areas were defined through the interactions between the built form, street patterns and the surrounding landscape. These features were found to heavily contribute towards the valued character and nature of each precinct.

### AREAS WITH NEW AND CHANGING CHARACTER

Some areas are subject to redevelopment, or have aspects of their character that are a cause of strong concern by local people, warranting change to the physical fabric. In both these instances, the appropriate planning strategy may well be to try to improve the character of the area by changing it. Achieving a measured and consistent change in the new development character of an area requires a sound approach to planning. Definition of the new character will often require urban design skills, and the process of managing change may require a sophisticated program with community involvement.

Areas yet to be developed should be allowed to create a new character within broader parameters, such as relating to the built character of adjoining areas and expressing the underlying landscape character.

### CHARACTER TYPES

#### INNER URBAN

*Built form dominated residential areas. Examples: Melbourne’s inner suburbs (eg. Carlton, Fitzroy, Port Melbourne, Williamstown)*

This intensive form of subdivision, much of it into small, narrow blocks, resulted in a built form dominated character. This type of character is widespread in Melbourne’s inner suburbs, but unusual outside Melbourne, except in the centre of some older regional

centres and country towns such as Bendigo and surrounding settlements. Some of these areas were subject to a planned approach, with formal street layouts and a more effective control of land release subdivision. Others grew more haphazardly, with streets of varying width, including many very narrow streets, often without connectivity, and no provision for parks and squares.

Our view of the inner suburbs of Melbourne and regional centres as living environments has been transformed in the last forty years. Originally the focus of slum clearance policies, they have since become desirable residential locations, valued for the urban lifestyle and heritage qualities. Urban designers see them as exemplars of a more sustainable urban form.

**TABLE 3 INNER URBAN CHARACTER TYPE SUMMARY**

DESCRIPTION	MAIN CHARACTERISTICS	PRINCIPLES
Dense, low rise residential mixed use areas serviced by strip centres.	Highly urban character with buildings dominating the street scene.	Continue to conserve the heritage areas.
Largely intact Victorian colonial suburbs of high heritage value (probably world significance) associated with the rise of Marvellous Melbourne.	Low rise scaled, narrow fronted rhythm.  Small front setbacks, small or zero side setbacks, create unbroken ‘walls’ to the street.	Maintain and enhance the hard urban character, with its solid, fine-grain streetscape ‘walls’, dense, connected street and laneway networks, minimal setbacks, and pedestrian friendly environment.
A walking, horse-drawn carriage and tram-based city.	Front property boundary always expressed by a fence.  Possibility of siting new, more intense development so that it is ‘hidden’ from view.	
In outer areas, land sometimes remained undeveloped for decades, leading to mixed eras of	Fine-grained, connected street and laneway pattern, highly conducive to walking and cycling.  Served by relatively dense	



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DESCRIPTION	MAIN CHARACTERISTICS	PRINCIPLES
development (eg. Northcote)	network of strip activity centres and public transport services.  Many areas of mixed use.	

**GARDEN SUBURBAN**

*Spacious residential areas in a garden setting (formal street pattern, generally modified grid). Examples: the Melbourne middle suburbs (eg. Camberwell, Essendon, Sunshine).*

The middle suburbs of Melbourne are possibly what most people have in mind when they talk about Melbourne's comfortable 'liveability', and compare its suburbs favourably as living environments with the affordable equivalents in Sydney. The middle suburbs became the crucible of the protests relating to urban consolidation, the Good Design Guide and neighbourhood character in the 1990s. Outside Melbourne, most urban residential areas have the spacious 'garden suburban' character, because densities and site coverage tend to be lower than equivalent metropolitan areas.

Most garden suburban residential areas are laid out within a north-south, east-west grid of one chain (20m) main roads (more likely to be 30m in regional Victoria). Mostly the street pattern is grid-based or grid-adapted. The roads are tree-lined avenues, often with concrete kerbs and footpaths, and grassed nature strips. Some housing has low walls fronting formal, trimmed gardens that are open to the street, and houses are located within the lot, rather than extending to its boundaries. The atmosphere of a garden suburb is one of space and trees, though the separation of private and public land is clearly defined.

**TABLE 4 GARDEN SUBURBAN CHARACTER TYPE SUMMARY**

DESCRIPTION	MAIN CHARACTERISTICS	PRINCIPLES
Train and tram based.	Spacious feel: space around and between buildings, open	Use a formal approach to street

DESCRIPTION	MAIN CHARACTERISTICS	PRINCIPLES
Late Victorian to 1960s / 70s.	rather than enclosed street space, large setbacks	space design (eg regular avenues of trees, regular geometry of kerbing and traffic management devices)
Grid-based street pattern.	Green and leafy appearance in many areas	Retain the spacious, green and leafy character, including views of backdrop vegetation between and over buildings, generous front garden setbacks open to view from the street, and grassed nature strip with minimal interruption
Spacious streets and gardens.	Low scale, dominant roof forms, strong horizontal emphasis	Maintain the horizontal emphasis of massing and form resulting from the dominance of the roof form
Detached houses, double or triple fronted.	Gaps between buildings	
Footpaths and nature strips and tree avenues (often exotic).	Front property boundary usually defined by low, solid fence or moderate height 'transparent' fence (eg wire mesh)	
Car storage		

**GARDEN COURT**

*Spacious residential areas in a garden setting (informal, generally curving street pattern with courts/cul-de-sacs). Examples: Melbourne outer suburbs such as Chirnside Park, Wantirna, Carrum Downs.*

From the 1960s to present time, garden court residential areas have emerged. They grew faster in the north-east, east and south-east than in the north, north-west and west Melbourne. These suburbs have grown on the fringes of Melbourne and other centres, where initially infrastructure and services were inadequate.

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The term Garden Court refers to the combination of a Garden Suburban type of development superimposed on a pattern of curvilinear streets with cul-de-sacs or courts. This layout was designed to accommodate full car-based access as safely as possible, by eliminating ‘rat runs’ and providing low speed, low volume traffic environments within the courts. A negative consequence of this type of layout has been the poor connectivity of the street system for bus routes and walking.

These areas tend to be associated with car-based, stand alone retail centres. In seeking to create more sustainable urban environments, government policy will need to address these deficiencies over the long term.

The curvilinear street pattern results in the creation of informal street spaces which are often complimented by informal (often native) garden planting. There is often only one footpath, sometimes none at all.

More recent trends in Garden Court areas have seen reduced setback and road width standards, coupled with substantially increasing site coverage. Many estates of the 1990s include large numbers of two storey houses with much reduced setbacks. These changes have reduced the ‘garden’ aspect of the character, increasing the sense that the street is lined by a solid ‘wall’ of buildings. Although street and garden trees will eventually mature and ‘soften’ these streetscapes, they will continue to have a more built-form dominated character.

**TABLE 5 GARDEN COURT CHARACTER TYPE SUMMARY**

DESCRIPTION	MAIN CHARACTERISTICS	PRINCIPLES
Car-based 1960s/70s onwards	Pre-1990s: spacious feel – space around and between buildings, open rather than enclosed street space, large setbacks	Use an informal approach to street space design (eg informal groupings of trees, irregular geometry of kerbing and traffic
Curvilinear plus court-based street pattern		
Spacious streets and	From the 1990s: a more enclosed feel due to smaller	

DESCRIPTION	MAIN CHARACTERISTICS	PRINCIPLES
gardens	setbacks, higher site coverage and two storey development	management devices)
Detached houses, double or triple fronted	Green and leafy appearance in many areas	Retain the spacious, green and leafy character, including views of backdrop vegetation between and over buildings, generous front garden setbacks open to view from the street, and grassed nature strip with minimal interruption
Two storey houses and higher site coverage common from 1990s	Low scale and horizontal emphasis of dominant roofs (pre-1990s)	
Nature strips, often without footpaths	Gaps between buildings (less from 1990s)	
Informal street tree planting, often native	Less emphasis on separate definition of public and private domain: front gardens often not fenced	In pre-1990s areas, maintain the horizontal emphasis of massing and form resulting from the dominance of the roof form
Car storage usually off-street and behind the building line (in front of the building line in some more recent estates)		
Car-based, stand alone retail centres		

## MEMORANDUM OF LANDSCAPE OBSERVATIONS & INITIAL RECOMMENDATIONS

Christchurch District Plan, Plan Change 14

For the areas within the Riccarton Bush – Kilmarnock Residents' Association zone.

*ISSUE: TO ACCOMPANY SUBMISSION ON PC14*

*Date: 8 May 2023*

*Prepared by:*

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## MEMORANDUM OF LANDSCAPE OBSERVATIONS & INITIAL RECOMMENDATIONS

Project no: 5381

Revision: B

Date: 8 May 2023

Author: Bridget Robilliard - Registered Landscape Architect (NZILA)

Reviewed by: Jade Au Morris - Registered Landscape Architect (NZILA)

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#### Notes:

- Images captured on Fuji film X-T10 camera with XF 50mm zoom lens.
- Date: 27<sup>th</sup> April 2023 between 2.33pm and 4.27pm.
- Height of 1.65m.
- Each view includes several photos merged together to create a panorama view, to provide 124 degree viewing angle to meet NZILA best practise guidelines
- Photo sizes are adjusted to suit document layout, original images can be provided if required.

## 1. INTRODUCTION

- 1.1 This memorandum of landscape observations and initial recommendations has been prepared to form part of the submission on the proposed Christchurch District Plan, Plan Change 14 by the Riccarton Bush – Kilmarnock Residents’ Association.
- 1.2 The areas which were assessed for the preparation of this memorandum were areas that sit within the Riccarton Bush – Kilmarnock Residents Association’s boundary, with focus on key areas within the zone which have been identified by the Residents’ Association, with the advice from Christchurch City Council staff, as requiring the professional advice of a landscape architect.
- 1.3 It is intended that this memorandum forms part of the submission and that further investigation and a formal landscape assessment shall be carried out following the submission if required.

## 2. METHODOLOGY

- 2.1 Relevant sections of the proposed Plan Change 14 have been reviewed prior to preparation of this memorandum, with particular focus on:
- Section 32 evaluation item 6.11 Building heights adjoining Riccarton Bush,
  - Appendix 43 Pūtaringamotu Riccarton Bush Heritage Landscape Review.
- 2.2 The site visit and preparation of this memorandum has been undertaken by Bridget Robilliard (Registered NZILA Landscape Architect) from KM. The memorandum has been reviewed by Jade Au Morris, a Registered NZILA Landscape Architect from KM.

### 3. LANDSCAPE OBSERVATIONS & INITIAL RECOMMENDATIONS

The following sections relate to key areas within the Riccarton Bush-Kilmarnock Residents' Association zone in which landscape architecture advice was requested. These sections include initial observations of potential impacts of the proposed Plan Change 14 on the landscape character and features. Preliminary recommendations have been included where deemed to be appropriate.



Figure 1. Map indicating areas of discussion, outlined in black. Not to scale.

#### A. RICCARTON BUSH INTERFACE AREA

- I. Location: The extent of the Riccarton Bush Interface area was assessed during the site visit. The zone considered to have visual impact for both outward looking views from Riccarton Bush and House grounds and inward looking views from the surrounding areas was reviewed.

Discussion: It was found that the zone noted to be considered as the Riccarton Bush interface area in appendix 43, and incorporated into the proposed plans, aligned with our assessment with the exemption three lots which we believe should also be included within the zone. During our site visit it was found that 34, 36 and 36A Kahu Road also held a strong visual impact to both outward views from the Riccarton House Grounds and inward views from the public road. The location of two of these sections adjacent to the Ōtākaro/ Avon River would also suggest that development would have a greater visual impact as a contrast to a natural landscape feature. Note: The observation of Riccarton Bush and Riccarton House grounds being intrinsically tied as noted in Appendix 43 was also adopted during this preliminary assessment.

**Recommendation:** We recommend that 34, 36 and 36A Kahu Road be included within The Riccarton Bush Interface Area.

**Note:** Any further change to the proposed zoning rules within the area surrounding Riccarton Bush, including areas not currently considered to be within the Bush interface area, should consider any potential adverse effects on visual amenity and landscape character.



*Figure 2. View from the north-eastern area of Riccarton House grounds looking north towards 34 and 36A Kahu Road across the Ōtākaro/ Avon River.*



*Figure 3. View from the Kahu Road bridge over the Ōtākaro/ Avon River looking south west with the Riccarton House Grounds on the left and 34 Kahu road on the right.*

- II. **Location:** The potential visual impacts of properties which face the Riccarton House Grounds was considered during the site visit. This was in regard to 9 to 35 Kahu Road, and 6 to 10 Kahu Road, which are included in the Riccarton Bush Interface Area.

**Discussion:** This initial assessment also took into consideration visualisations included in Appendix 43 in relation to these frontages. The outward looking views of this area from the Riccarton House Grounds has the potential to have a high adverse visual impact of the visual character of the main entrance into Riccarton House Grounds and from the southern area of the grounds. It was also considered appropriate that the physical connection with this area to the historic Deans Farm buildings, as noted in Appendix 43, be taken into consideration in regard to landscape character as a space linking the historic Dean's Family buildings.

**Recommendation:** That further visual simulations be developed which explore potential benefits to visual amenity and landscape character of an increased set back (greater than the proposed 1.5m) from the road boundary. Should these visualisations indicate a reduced visual impact, it is recommended that the inclusion of a greater road set back to properties within the Riccarton Bush Interface area which face the Riccarton Bush and House grounds be incorporated into Section 14.



*Figure 4. Looking east towards Kahu Road from the main entrance into the Riccarton House Grounds.*

III. Location: Sections physically adjoining Riccarton Bush and House Grounds were assessed for both outward and inward views, while other potential implications such as the health and maintenance of The Bush were also considered.

Discussion: Generally, site observations agreed with those noted in Appendix 43 and aligned with the extent of the zoning proposed in Plan Change 14. It is considered that there is potential for high adverse visual impact by development to sections directly to the south of Riccarton Bush and Riccarton House Grounds as there is a degree of visibility from the southern section of Te Ara Karariki trail. Current visual impact is limited by the position of built structure, materiality and colour and planting of these dwellings. It is suggested that further considerations of impacts and additional requirements be implemented if deemed necessary. The protection of vegetation along this boundary is also of great importance to the visual amenity for both inward and outward views as well as of historical value. This area was where the historically Pūtaringamotu extended past the current size, prior to harvesting and full removal by The Canterbury Association. Much conservation effort has been made by both the Dean's family, and later by The Riccarton Bush Trust, to ensure this boundary provide suitable protection for the larger Bush area. The health and maintenance of the bush along all boundaries is of high importance to retain the biodiversity, visual amenity and landscape character of the site and neighbouring boundaries. The development of properties adjoining Pūtaringamotu/ Riccarton Bush also have the potential to have implications of the management of The Bush, it is considered appropriate that aspects which will minimize risk of damage to The Bush, by elements such as predator intrusion and fire, from development to neighbouring properties be integrated into Plan Change 14.

**Recommendations:**

- **That further visual simulations are developed to assess the potential impact of building positions, material and colours to properties directly adjoining the southern area of Riccarton Bush and House. Should potential for adverse effects be found then recommendations from these assessments should be included within Plan Change 14.**
- **An arborist and ecologist are engaged to assess potential impact of the health of Pūtaringamotu/ Riccarton Bush by possible development directly around the edge of Riccarton Bush, and any recommendations and integrated into Plan Change 14.**



- **That the Riccarton Bush Trust be consulted regarding considerations for impacts on the management of Riccarton Bush from neighbouring development.**

## B. KAURI CLUSTER

- I. Location: The Kauri Cluster refers to Kauri Street, Rata Street and Rimu Street, bounded by Riccarton Road to the South and Straven Road to the East.  
Discussion: Landscape improvements were carried out in 2008/2009 by Christchurch City Council and included the planting of native street trees which have now reached an intermediate size and appear to be in good health. The current landscape character of the area is in keeping with the proximity of Riccarton Bush and House. It is considered possible that the permitted development so close to the road boundary may have detrimental impacts to established vegetation through changes to microclimates of shading and wind and disturbance or root runs. The establishment of a number of specimen trees in close proximity to Riccarton Bush and House may be and/or may have potential to provide ecological benefits, which if found to be of value should be maintained.  
Recommendations:
  - **That an ecologist be engaged to assess the ecological value of the protection of the existing native vegetation within the Road Reserve.**
  - **That an arborist be engaged to assess the potential impacts of the proposed permitted development of the established vegetation and recommendations for protection of the vegetation be considered and incorporated into Plan Change 14.**

## C. MATAI STREET WEST

- I. Location: A Cycle path is located to the northern side of Matai Street West. This is a proposed High Density Residential Zone, with permitted heights up to 14m. The bike lane connects from The University of Canterbury to the CBD. This section of the bike trail and the footpath to the northern side of Matai Street West appear to be heavily used by Christchurch Girls High School and Christchurch Boys High School student, with the schools located at either end of the road.  
Discussion: It is considered that the proposed height of 14 meters and 1.5m set back distance from the road frontage that would be permitted in this area may have safety implications due to shading to the cycle and footpath during the

winter months. This could increase the frost and ice present on the path, and how long the ice/frost lasts during the day. During the site visit it was observed that some shading already occurs from a limited number of properties during the afternoon in April.

**Recommendation: That shading diagrams be developed and a traffic safety assessment be carried out for consideration of safety impacts. Should potential for safety issues be found it is recommended that height and or set back allowance to northern properties are reviewed.**



*Figure 5. The western end of Matai Street West looking West.*

- II. **Location:** Specimen trees planted between the cycle path and carriage way to the north and between the carriage way and the footpath to the south of the road are of an intermediate size and appear to be in good health. The establishment and protection of specimen trees along this road is considered to be of particular value as this road physically and visually links the historic sites of Mona Vale and Riccarton Bush and House.

**Discussion:** It is considered that the shade and proximity of possible development to the road reserve boundary (1.5m) may have detrimental effects to the established vegetation.

**Recommendation: That an arborist is engaged to assess possible impacts on existing vegetation from the proposed development. Should it be found that there are risks to the health of the existing vegetation it is recommended that this be considered and incorporated into Plan Change 14.**

# FOR THE CHRISTCHURCH DISTRICT PLAN INDEPENDENT HEARINGS PANEL

Regarding Proposed Plan Change 14,  
Housing and Business Choice

SUBMISSION from

Robert Leonard Broughton

25 Rata Street, Riccarton,

Christchurch, 8041

I wish to appear before the Independent  
Hearings Panel

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## INTRODUCTION

I fully support the submission from The Riccarton Bush- Kilmarnock Residents' Association (RBK) for the area in which I live.

I will add my concerns not only for the area but for the street on which I have lived for over 40 years, raised a family and actively supported the community.

I live in Rata Street on the southern side of the street opposite Riccarton Bush/House and grounds.

The current zoning is **Residential Suburban** and I submit that this **should remain** and **not** be changed to Medium Density in any form.

**I will argue that the area known as the Kauri Cluster retain the current zoning.**

I submit that the fact that over 20 Residents Associations from across Christchurch representing residents from all groups and areas should surely signify a massive revolt against **the one size fits all** policies (BespokePlanproposal20220921) of the Government and that the Christchurch City Council (CCC) should continue to stand for the City of Christchurch and its residents. The CCC stand is summed up in the attached article. (GregPartridgearticle1March23).

I point out that the CCC objected to the excessive nature of the legislation in a lengthy submission (Letter from Mayor Leanne Dalziel) and furthermore our local MPs once demanded the CCC do something about the type of developments being allowed in the City.

Our local MPs stood as stated in the article from the Christchurch Press,  
**MPs urge tighter house-building rules to protect neighbourhoods**  
 Dominic Harris and Michael Hayward:18, Mar 01 2019

“Addressing councillors on Thursday, Webb and Dyson said that while well-managed intensification was good for the city, too many developments had "significant shortcomings". In a submission to the council – backed by Christchurch East MP Poto Williams and Te Tai Tonga Maori electorate member Rino Tirikatene – Webb said poor planning around intensification of housing **could damage "liveability" and harm the character of neighbourhoods.**”

***These concerns are very much in line with the views of the residents of Christchurch.***

**The concern is not against intensification as such but against the excessive and over-intensification being imposed on Christchurch by poorly thought through policies. Isn't it enough that areas of Christchurch have already suffered under the CCC planners allowing unbalanced, chaotic and over densified development of sections way above even the current plan.**

**The CCC has prepared strategies for Christchurch that are being trampled on by the Government legislation.**

For example:

**Christchurch City Council Community Strategy.**

“Enabling active and connected communities to own their futures”

**Ōtautahi - Christchurch Climate Resilience Strategy**

I aim to link these strategies alongside what they involve for my area in particular but which apply across the city as well.

Unfortunately the totally aspirational plans espoused in the CCC document:

Planning for our growing city; [ccc.govt.nz/growingcity](http://ccc.govt.nz/growingcity)

together with the Urban Growth Programme

(Huihui Mai Greater Christchurch – let’s come together to plan our future)

seem to ignore reality and actual facts and actually contradict the above strategies.

## 1-FAILURE TO PROPERLY ASSESS SOCIAL IMPACTS

This has been covered in the Riccarton Bush – Kilmarnock Residents' Association's (RBK) submission.

In addition I would add the following:

### HEALTH AND WELLBEING INCLUDING EFFECTS OF 6-STOREY BUILDINGS

High density residential intensification needs to be where it is most appropriate, in the CBD and, to a lesser extent inside the four avenues. Again, communities should be consulted before recommendations for intensification are made, to ensure such intensification occurs where communities are willing and welcoming

Multi-storey residential developments in the suburbs are dehumanizing and unhealthy. They separate people from each other and the outside environment. They greatly reduce socialisation in communities including the number of encounters on the street or over the back fence.

The effects of multi-storey residential developments on mental health have been researched and documented. They keep children and the elderly from getting exercise. They encourage people to stay at home and flick on the TV, depriving residents (especially children) of physical play and peer activity.

We can look forward to big boxes with little outdoor space. At 1 metre from the boundary, dwellings can be 2 storeys, and further into the site up to 3 storeys, (11m plus 1m for a pitched roof).

A cost-benefit analysis carried out by PwC for the Government puts a price tag on changes to sunlight and views under the housing intensification bill, which allows new homes of three-storeys to be built almost up to the fence-line. Many planners are panning it.

A pricing tool called Icarus invented by the Sense Partners of Wellington has been used for the first time to put a price on the impact of more shade and less view. The lower combined estimated cost is \$650 million nationwide, and the higher is \$1.3 billion, with the price of lost sun slightly higher than for lost views.

This represents tens of thousands of dollars lost from the market value of each house affected. However, the impact on people's lives from the lack of sunshine is even worse. It is described as an impending "disaster."

In terms of **well-being**, a term beloved by this Government, there is plenty of discussion on the site Smart Cities Dive.

So it is pertinent to ask "**what is meant by Liveability?**"

Liveability describes the frame conditions of a decent life for all inhabitants of cities, regions and communities including their physical and mental wellbeing. Liveability is based on the principle of sustainability and smart and thus is sensitive to nature and the protection of its resource. The special focus to improve Liveability is to take all dimensions that are relevant to Liveability into account: the physical, the social and the cultural. We start from our global perspective but are most sensitive about the specifics and characteristics of the local situation. **A local approach is crucial for Liveability.**

This ill-conceived, poorly drafted Government plan simply does not address this at all. In fact it is the antithesis of the concept of liveability.

Research from overseas, along with trends observed in New Zealand, indicate a change in peoples attitude to living as a result of the age of Covid. It has been very evident that highly intensified cities are simply incubators for the spread of a virus. Covid is not done yet and scientists have said the human race will be faced with future pandemics especially if the jungles are continued to be encroached on. One only has to look at New York and Auckland for example to see what overcrowding does. As a result there is a world-wide movement to move out of cities for a healthier lifestyle. Working from home has become the norm so people are saying “why not work from a healthier, less expensive environment with no commuting hassles.” (Smart Cities Dive articles). So why force excessive over-intensification on Christchurch and on the Riccarton Bush – Kilmarnock Residents’ Association (RBK) in particular.

Below are **7 reasons why high-rises kill liveability:**

7 Reasons Why High-Rises Kill Livability | Smart Cities Dive  
<https://www.smartcitiesdive.com/ex/sustainablecitiescollective/7-reason...>

### **1. High-rises separate people from the street**

According to Gehl, a city is best viewed at eye-level. Sure the views from a high-rise can be stunning, but you aren't able to see people in a way that allows for connection. Because it's not as easy as walking out your front door, people who live on the high floors of a high-rise are less likely to leave their houses. This separates people from the outdoors, the city and from other people. "What high-rise does is separate large numbers of people from the street, so we end up with a city that is detached from street life, we end up with a city that is based on enclaves and gated communities," says urban planning expert Michael Buxton.

And Gehl maintains that "meaningful contact with ground level events is possible only from the first few floors in a multi-story building. Between the third and fourth floor, a marked decrease in the ability to have contact with the ground level can be observed. Another threshold exists between the fifth and sixth floors. Anything and anyone above the fifth floor is definitely out of touch with ground level events."

### **2. High-rise scale is not the human scale**

When you walk through a high-rise neighbourhood, you lose sight of the human-scale in high-rise neighbourhoods.

600x90 horizontal banner

### **3. High-rises radically reduce chance encounters and propinquity**

Because high-rises tend to separate people from the street and each other, they greatly reduce the number of chance encounters that happen, which are crucial to the liveliness of a city and to creating social capital. And because people are cooped up in tall buildings, they are less likely to experience propinquity, a concept introduced to me by architect and urban designer, Kevin Kellogg. Propinquity is "one of the main factors leading to interpersonal attraction. It refers to the physical or psychological proximity between people. Propinquity can mean physical proximity, a kinship between people, or a similarity in nature between things," according to Wikipedia. Propinquity happens in public spaces – on the street, in parks, public transportation and city squares. High-rises



diminish people's participation in public spaces and therefore diminish propinquity.

Living in a high-rise creates a very finite and encapsulated world in and of itself. The high-rise becomes your world, especially those which include a restaurant, market, gym and other amenities. You never have to go outside or encounter other people. Plus, this phenomenon creates the opposite effect of public spaces. It ensures that people mostly interface with others of the same socioeconomic strata. High-rises literally create silos, both physical, social and psychological.

#### **4. High-rises are vertical sprawl**

How could high-rises possibly be sprawl as they take up so little actual land? Sprawl is when something is built inefficiently and takes up too much space. With high-rises, they take up too much vertical space for something (in this case dense housing) that could be achieved with much less height.

isolation and is often devoid of people on the streets, high-rises offer up the same problems, but just from a vertical perspective. Plus, not unlike the vast swaths of suburban tract homes that are built during an economic bubble that often end up empty, high-rise bubbles can be just as unrealistic.

#### **5. High-rises=gentrification and inequality; Low/Midrisises=resiliency and affordability**

According to Suzanne H. Crowhurst Lennard, co-founder and director of the Making Cities Liveable International Council, "the construction industry is a powerful engine for fueling economic development. Tall buildings offer increased profits for developers. However, the higher a building rises, the more expensive is the construction. Thus, the tallest buildings tend to be luxury units, often for global investors. Tall buildings inflate the price of adjacent land, thus making the protection of historic buildings and affordable housing less achievable. In this way, they increase inequality."

On the other hand, says Making Cities Liveable, "small footprint shops and apartments in a fine textured urban fabric yield smaller profits, spread out among many individuals and businesses in the community. Over centuries, this human scale urban fabric has proved to be adaptable to changing political and economic times, making the community resilient, and durable. The City of Paris, with buildings no taller than 100', supports continuous retail along the street, making every neighbourhood walkable."

#### **6. Are High Rises Even Green?**

.High-rise buildings are built largely of steel and concrete and are less sustainable than low rise and mid-rise buildings built largely of wood; steel and concrete produce a lot of GHG. Wood traps it.

Concrete is 10 times more GHG-intensive than wood.

#### **7. High Rises are not good for your health**

This assertion may sound laughable to some, but the effects of the high-rise on mental health have been researched and documented. Psychologist Daniel Cappon writes in the Canadian Journal of Public Health that high-rises keep children and the elderly from getting the exercise the extra effort it takes to get outside encourages them to stay at home and flip on the TV. High-rises, he says, also deprive people and especially children of "neighbourhood peers and activities." And he believes that the level of alienation and isolation, things that have been proven to negatively impact

health and even shorten people's lives, increase with the height of the building.

In conclusion, I'll quote Cappon at length:

"What is there to say? We must have the incontrovertible evidence and the mechanism whereby the high-rise leads to the low fall of urban humanity. Meanwhile, we must not go on blindly building these vertical coffins for the premature death of our civilization. What shall we do instead while we are wanting to learn the ultimate facts? We can satisfy the economy needs for high density per land acre, which of itself is not likely to produce ill health, while restricting height and redistributing spaces in terraced, human-scale fashion, supporting social confluence and relationships or, at least, not impeding the nurturing of precious human resources."

If one researches into the issues of intensification on sites such as "Smart Cities Dive" then one will find plenty of data. I give one such quote:

**The high-rise is not the only answer to density. In fact, it may be a very unsuitable solution that undermines the character, liveability, social fabric and even the public health of a city.**

**My comment on the prospect of 6-storey buildings along Riccarton High Street.**

Why would anybody suggest allowing 6-storey buildings along this narrow stretch of road, creating a wind tunnel effect with little sunshine resulting in a cold gloomy environment such as exists in parts of the CBD – a most uninviting environment.

**So I also submit the plan change should be reviewed once a proper social impact assessment has been completed**

## **2-SUNLIGHT PRESERVATION; SEEKING AMEMNDMENT TO THE QUALIFYING MATTER**

**I strongly support the argument made in the RBK submission for a sunlight qualifying matter putting limits on building heights, recession planes and set-backs to preserve residents' access to sunlight. Refer to the comments in ITEM 1 regarding well-being.**

### **3-THE RICcarton BUSH INTERFACE AREA (RBIA):SEEKING AMENDMENT TO THE QUALIFYING MATTER**

**There is a comprehensive coverage regarding this issue in the submission from RBK under this topic.**

I am personally affected by the CCC proposal and I submit that:

the area known as the Kauri Cluster should not be reformulated into disjoint parts but remain as intended by the CCC remodelling in 2006 and all areas referred to in WSP's Putaringamotu Riccarton Bush Heritage Landscape Review (recommended for inclusion in the RBIA) should be limited to 2-storeys and remain Residential Suburban density.

That specifically the area remain as currently zoned: Residential Suburban. Specifically in my case that the south side of Rata Street **not** be rezoned Medium Density allowing 3 x 2-storey on sections with the added effect of excessive unrestricted on-street vehicle parking and the destruction of the beautiful Rata trees.

**I submit there is nothing to be gained by changing the current zoning.** Those who have moved into the south side of Rata Street and built new homes in good faith, moved families and older people into the area, and in doing so intensified the dwelling density, should not suddenly have their worlds upturned by the overturning of the decisions made by the IHP in 2015 after lengthy comprehensive deliberation.

The functionality of Riccarton Bush/House would be severely inhibited by decisions that would allow excessive long-term on-street parking. This would certainly include the successful and popular Farmers' Market held on Saturday mornings where the local streets currently provide room for clients to find parking. Covering sites with concrete would impact the significant and welcome bird life that interacts with the Riccarton Bush/House and grounds.

This is discussed further in section 9.

### **4-RICcarton COMMERCIAL/RESIDENTIAL TRANSITION ZONE: A NEW QUALIFYING MATTER**

**I agree with the points made in the RBK submission.**

In addition the proposed phalanx of high rise allowed along Riccarton Road would turn the road into a very unpleasant environment on a regular basis since it would allow for a wind tunnel effect for the prevailing Christchurch easterly winds which are strong and invariably cold. The same effect would come with the westerlies especially unpleasant when raining. A plethora of 5-6 storey buildings would also cause major issues in an earthquake event.

### **5-THE AIRPORT NOISE INFLUENCE ZONE: SEEKING AMENDMENT TO THE QUALIFYING MATTER**

**I submit that the properties on the southern side of Rata Street, should, for reason and consistency, all be included in the Airport Noise Influence Zone. Modelling is not an exact process and I fail to understand that, whilst the properties on the north side of Rata Street are in the zone, those on the south side some 20 metres away are not. Often when in my lounge at 25 Rata Street (on the south side of Rata Street) I experience substantial vibration and noise from planes flying low overhead that I have rushed outside to see if there was an issue. I can hear the noise from the testing of engines.**

**I thus submit that for consistency both the north and south side of Rata Street be included in the Airport Noise Influence Zone.**

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

I submit the walking distances to Riccarton centre boundaries (which we understand the legislation states defines the extent of high density 6-storey residential zones) be reconsidered based, not on distance, but on time taken to walk to key amenities in the centre zone.

The centre of Riccarton should be taken as the CCC Community Centre in Clarence Street.

This sits in the heart of the Riccarton centre with access in all directions to businesses.

## 7-ON TREES

**I submit** Protections for trees, and incentives for planting more trees, should be part of the changes proposed in PC14.

Any financial contributions made to compensate for tree removal should be required to be spent in the area where trees are removed to, at least, replace what was there with equivalent planting.

*The Council says it knows trees are important to people. That they play a vital role in helping tackle climate change, reinforce our identity as the Garden City and provide a range of other essential environmental, economic, cultural and social benefits.*

**Comment:** A great statement so why is Christchurch losing so many mature trees. Developers simply strip a site of mature trees, shrubs and plants. This is not helping climate change since it takes decades for newly planted tree to perform as well as mature trees.

Why are the City planners imposing planning rules that will see the wonderful sight of Rata trees in bloom, Kauri and Rimu trees enhancing the streets in a Council inspired development from 2008 only to be swept away by thoughtless planning that gives the power to developers who don't care.

*The Council says it is working on ways – both through this plan change and also in other non-regulatory ways – to ensure that green spaces and trees can be retained as much as possible, while enabling more housing choice for our residents.*

**Comment:**In the area around Riccarton Bush there is an abundance of green canopy which is surviving the intensification of the area. Unfortunately the draconian plans being put forward do not bode well for the future where much of this will disappear. Six storey monsters will be the new wilding pines desecrating the area. The CCC statement is simply not going to hold.

*As part of this draft plan change, the Council proposes introducing Financial Contributions, which would be required from anyone developing land to help fund increasing our tree canopy cover in the city. These contributions will be used to plant trees on Council-owned land.*

**Comment:** What a joke. Ruin an established area with ill-conceived, poorly thought out plans. What planet are you on? The Council's proposed financial contributions will do nothing to retain the notion of a garden city or the proposal for a National Park. Developers will simply continue to do what they are already doing and ride roughshod over such feeble minded proposals.

*Additionally, the Council proposes that the Schedule of Significant and Other Trees currently included in our current District Plan becomes a Qualifying Matter. We will be reviewing approximately 900 trees on the list to provide the necessary evidence required under the NPS-UD to be considered as a Qualifying Matter, before the plan change is notified before 20 August 2022.*

*A further review of the Schedule of Significant Trees to protect additional trees could be carried out as part of any subsequent plan changes.*

**Comment:** Good to hear but will this be carried out?

*Our Tree Policy, introduced last year, outlines how we manage and maintain trees in public open spaces. We're also preparing an Urban Forest Plan that will provide a long-term vision and strategy to maximise the health and sustainability of the city's urban trees and forests. It's due to go out for community consultation later in 2022.*

**Comment:** What about providing protection for the many mature trees on private land?

Destroy the trees and destroy the accompanying bird life – not something King Charles and David Attenborough would be happy about.

*The reality is that high density residential intensification needs to be where it is most appropriate, in the CBD and, to a lesser extent inside the four avenues. Enabling high and medium density across our entire city will eventually result in suburban slums (particularly around malls and transport hubs), **destroy mature trees and gardens**, cause our CBD to stagnate, and threaten any chance we have of retaining our garden city status or becoming a National Park City.*

*Christchurch needs to look to developments overseas where the modern emphasis is on green, sustainable development including the concept of a "sponge" city.*

*Unless the Council can insure open green spaces in any intensification plan then any area suffering high density residential intensification will end up as slums with accompanying social problems.*

## 8-PLAN CHANGES VERSUS CLIMATE CHANGE AND GEOSCIENCE

### TREES and CLIMATE CHANGE

High density intensification in the suburbs destroys mature trees and gardens. It threatens any chance we have of retaining our garden city status or becoming a National Park City.

Housing developments should be constructed with the natural character and/or heritage of the surrounding areas in mind. The natural environment should be paramount and that means retaining established trees as integral components of new developments - rather than allowing sites to be cleared of all vegetation.

A Climate and Ecological Emergency was declared by the Christchurch City Council in May 2019, and our Government declared a Climate Emergency for New Zealand as a whole in December 2020.

Compelling international studies and research indicates that there are significant and substantial benefits in retaining and increasing tree canopy coverage in residential neighbourhoods. These include the **mental health and wellbeing** of residents, economic prosperity, and the obvious environmental benefits. Trees also strip emissions from the atmosphere, reducing storm-water run-off, and preventing urban heat islands from developing.

Christchurch has the lowest percentage of tree canopy coverage of any major city in New Zealand. There needs to be far more investment and spending to swiftly turn that around if the City Council is truly committed to battle climate change and for Christchurch to become a National Park City. That is not achieved by allowing trees to be cut down. The focus needs to be on planting more trees as well as (**not instead of**) retaining existing trees; and on all land, not just in parks owned by the Council.

Christchurch City Council along with Canterbury's nine District Councils and the Regional Council (ECan) recently launched the [www.itstimecanterbury.co.nz](http://www.itstimecanterbury.co.nz) website. The website speaks to the things many of us are well aware of:

- That trees and plants are the lungs of the planet - that they strip harmful global warming gases from the atmosphere and convert them into oxygen
- That New Zealand native trees store more carbon than exotic species and require less water to grow
- That there is a need to reverse the damage that's been done to the natural environment and the ecological systems in our city and region on both private and public land in order to reduce global warming gasses and to improve the health of habitats, waterways and ecosystems.
- That global warming and climate change is real, that it's already impacting our city, that it will bring more extreme conditions, and that it is going to impact our lives and the lives of children today and into the future

Why then is the City Council not doing more to protect the taonga of existing trees that have stood for generations breathing life into Ōtautahi Christchurch? Why not support plan changes that prevent avaricious property developers from continuing the practice of clear-felling properties of those precious trees, instead of doing the opposite with Plan Change 14?

The suggested workaround 'solution'; allowing developers to pay for the right to fell established trees has no merit. It is a solution dreamed up by an economist who figures funding the planting of six saplings on public land far away is a fair trade for the loss of a 100 year old Totara. That's not any kind of compensation. Anyone can plant new

trees. That's not the challenge. The real challenge is keeping them alive AND healthy and when it comes to following through on that, the developers are nowhere to be seen.

**Are Council staff aware of the extensive overseas research on cities that shows that for a city to be sustainable the green canopy should be above 40%. This is a minimum and yet the so called garden city is already below this. A disgrace for a Council that invoked a climate emergency.**

Let us look towards a green, sustainable city that is not covered in concrete. There are plenty of articles containing work on green, sustainable development and the development of "sponge" cities. The effects of climate change on Auckland and the north must surely be a wakeup to think of these issues together with the effects of excessive intensification on infrastructure.

#### References:

**Time running out to save Christchurch's trees from housing intensification:** Tina Law 05:00, Mar 05 2022

**Urban greening can reduce impact of global heating in cities, finds study.**

Nature-based solutions' like trees and rain gardens can be cost-effective climate adaptations, advocates say.

Fight or adapt to climate change? It's a false trade-off for cities, climate experts say

Projects that reduce planet-warming emissions and those that protect communities and infrastructure are both worth pursuing, said panelists at last week's Cities Climate Action Summit.

Published April 24, 2023 Ysabelle Kempe

## GEOTECHNICAL

All our area is either TC2 or TC3, yet, in making these planning changes, there appears to have been no consideration of the geotechnical strength of land across Christchurch. This is of grave concern. It appears people in high places have short memories. Policy-makers appear to have forgotten what occurred in our city in 2010 and 2011.

Hundreds died and tens of thousands were forced to evacuate their homes because they were built on poor land with inadequate foundations. The fact there appears to have been no consideration, in making these changes, of the geotechnical strength of Christchurch land is seriously worrying, especially given the issues post-quake surrounding multi-unit and high-rise developments. Given the findings of the programme regarding the parlous state of high rise complexes across the motu why would Christchurch people trust developers to deliver safe buildings. The nearly new Statistics Department building in Wellington came within an ace of collapsing on the staff (who managed to get out safely).

Much of this city is built on a swamp (including much of the lower Riccarton area where we live) so it makes no sense to enable high rise intensification in vulnerable areas when we all know the main divide is going to rupture.

After the events it was decided Christchurch should be a **low rise city. What happened to that proposition?**

Recently published articles in the media by geoscientists suggest future earthquakes will be more intense. The Alpine fault fracture is overdue. EQC research papers state the risk level resulting from an earthquake rises with intensification. Christchurch has suffered clusters of quakes recently, a bunch of level 3s and a bunch of level 4 Friday 21 April 2023.

A 4.0 magnitude quake struck 10 km north-east of Christchurch about 2.20am. The quake came at a depth of nine kilometres, causing moderate shaking, according to GeoNet.

It was followed by a second, 3.6 magnitude quake 10 km north-east of Christchurch at 7.31am. The light earthquake came at a depth of 10 km.

A third, 4.3 magnitude quake 10 km north-east of Christchurch followed nine minutes later, at 7.37am. The moderate quake had a depth of eight kilometres.

There were around 15,764 'felt reports', most of whom reported weak to light shaking, GeoNet said

### References:

**National Seismic Hazard Model Te Tauira Matapae Pūmate Rū i Aotearoa**

Historic Earthquakes

**The Earthquake Hazard in Christchurch – A Detailed Evaluation for EQC**



## 9-HOUSING AVAILABILITY AND AFFORDABILITY, PARKING

Higher density developments are attractive to investors who become landlords.

This is evident already in Christchurch with a number of developers moving away from targeting home-buyers to setting up schemes to encourage investor purchases. These investors then go on to become renters or they offer their properties for AirB&B. This type of process does not help solve the housing issue. Developers claim their developments are all presold. However many remain unoccupied as investors hope for the return of tourists and the opportunity to rent to them. Not helpful to the motel and hotel industry.

Also this type of development does not create communities. A greater proportion of dwellings being rented, many for short terms, creates a more itinerant population with **no social cohesion** leading to social problems including isolation and crime. Unfortunately my experience of the UK echoed by comments in a Press opinion piece would tend to support this position.

Housing developments must be **well designed and well balanced**. They need to be the right mix of owner-occupier and rentals, and in the right locations, in order to promote communities and protect the overall built character and heritage of neighbourhoods. I have no objection to the kind of high rise development in say Carlton Mill Road or Park Terrace. These areas are suitable for such development and are in the central city area. However apartments in these developments are very much in the upper price bracket.

Yes, there is a need for more affordable housing, but intensification is not necessarily the solution. The cost of building a new house (because of inflation, labour shortages, lending rules, and red tape) will never be cheaper and yet that is already more than most people can afford. No matter how much we intensify, no matter how many new houses we build, first home buyers will still struggle to afford them.

Buyers should also ask whether the box they are buying is in fact value for money.

This means the only beneficiaries of intensification will be the developers and the investors. Those that suffer will be the first home buyers and the renters.

However according to a Blackburn Management Report the market for medium density multi-unit dwellings is currently oversupplied and the number of new residential units being consented in Christchurch in 2023 will fall by 20% to 30% over the next 12 to 18 months.

### PARKING

Multi-unit developments with no off-street parking are already creating parking chaos in Christchurch. With no requirement now for a developer to provide off-street parking, further intensification will result in even more roads clogged with vehicles parking illegally on grass berms, over fire hydrants, straddling footpaths and encroaching over driveways, and on private property. In narrow streets this means emergency service vehicles will not have clear access to properties, putting lives in danger. Turning streets into parking lots is a massive hindrance to the collection of rubbish.

No off-street parking also has a serious effect on crime rates in the city (witness the recent front page of The Press, Tuesday 2 May 2023). More cars are stolen from on-street locations than off-street. With less off-street parking, more cars are easy pickings for car thieves, resulting in more crime, including dangerous and illegal driving and ram raids.

While there is a push from the Government to eliminate the requirement for off street parking (in order to encourage people to cycle or use public transport) the demand for these transport options remains low. It is true more people are moving to electric vehicles, but for economic reasons. Unfortunately the infrastructure support for these is seriously underdeveloped. Where are the roadside charging stations? Are residents expected to run extension cords from their cars across footpaths into their apartments.

In fact, as housing intensification increases (more people living in smaller and smaller spaces) and until there are sustainable, viable and attractive transport alternatives, the need for parking will increase, not decrease.

The height of insanity was to allow a 20 unit development of boxes with no off-street parking on a stretch of road already heavily parked out on a permanent basis resulting in residents trying to use local business car parks.

With respect to the RBK area, increased on-street parking would have a severe impact on the area in general especially on the highly successful Farmers' Market held on Saturday mornings held in the grounds of Riccarton House. The same could be said for the many events and functions held there as well. At the moment the limited time parking and off-street parking soaks up the visiting vehicles.

I submit that the basic assumption that cars will not be needed is simply not correct. New Zealand is not one big city. There are substantial terrain issues; issues of convenience of travel; emergency issues; to name a few. Also the Government is encouraging electric vehicles (EVs). Where are these going to park (not to mention get recharged)? In fact the cheaper EVs are considered great for driving round Christchurch which is not going to encourage bus use in an inconvenient, out of date public transport system.

In terms of the RBK area, parking is already a problem and the more the area is intensified with limited off-street parking the congestion on the streets will grow.

Having the Kauri Cluster choked with parked vehicles on a continual basis is hardly conducive the well-being and general liveability of the area.

## **10-ESTABLISHING A PLANNED PUTAINGAMOTU-RICCARTON PRECINCT: A NEW QUALIFYING MATTER**

**I submit, in the absence of a properly assessed plan for intensification and development in Riccarton, the entire area represented by the Riccarton Bush Kilmarnock Residents' Association (RBK) should be designated a Qualifying Matter, with current zonings maintained as agreed in the Christchurch Replacement District Plan Review of 2015, pending a comprehensive planning review**

**I strongly support the argument in item 12 of the same heading in the RBK presentation.**

A strong argument for this proposal is that this area is a **community, it is also a character/heritage area.**

### **Community**

It would be difficult to ignore the effect a community has on its area. **Community values help define the character of an area.** The area given by the Riccarton Bush – Kilmarnock Residents' Association (refer its submission) to the north of Riccarton Road and including the Riccarton House and Bush, has predominantly owner occupied properties many with long standing residents. It is a diverse community of different age groups, encompassing older retired residents and families of various ages. As the CCC planners discovered at the previous attempt to change the zoning when a large number of residents attended the planning meeting in the Chateau, there is a **strong sense of community**. The anger at these current proposals was also evident at a recent meeting attended by residents of all ages. Residents know one another, stop to talk whilst walking in the area, and look out for one another. The residents are also proud of their area and look after their properties and the CCC areas such as the grass berms and planting. Indeed residents have won garden awards. Also the residents recognise the need to protect Riccarton Bush.

In contrast the area to the south of Riccarton Road is 80% itinerant rental accommodation with little cohesion. This area is a good example on how to destroy a community with poor planning and a chaotic mess of development. This is the result of planners lacking sense and indeed lacking any overall plan for balanced and cohesive development (as once voiced by MP Duncan Webb!).

This Riccarton Bush surrounding area encompasses a wide variety of buildings with old character homes (some dating from the 1920s) both single and two storey, new architect designed homes, smaller units, town houses, and revamped older homes. The materials used in construction vary from traditional wooden weatherboard to brick and modern materials. Older character homes have distinctive brick chimneys and slate roofs whilst newer homes have modern profile colour steel. Basically there is a diverse mixture of old and new, well-spaced buildings, contributing to a general positive ambience. The land occupancy varies. There are larger sections, medium sections and small sections. Infill has occurred over time replacing older buildings with multiple new buildings. However there have been new family homes built on bigger sites. The current Residential Suburban (formerly Living 1) zoning has controlled the nature of the infill thus contributing to the essential character of this area. However the density of dwellings/apartments has considerably increased over the years. The result has been so far a **balanced increase in keeping with the area.**

There has been an influx of people of all ages including families who sought to live in the area precisely for the reasons given. Yes it is close to commercial and educational facilities as well as green space. The area boasts a very useful cycle route from the University, through the Riccarton House grounds, along Matai Street, and hence through Hagley park to the city centre area. This gives access to a significant number of educational sites, heritage sites, Hagley Park, and the central city area. At least one cycleway success story that will be set back if this intensification goes through.

## Character and Residential Heritage Areas.

Character arguments largely revolve around the historical significance of what was a large part of Christchurch's founding Riccarton Borough, and the remaining character gems in the area.

Our last remnant stand of swamp dwelling kahikatea, Pūtaringamotu is the Māori name for the area now known as Dean's Bush. Maori of Ngai Tūāhuriri, a sub-tribe of Ngāi Tahu, occupied the land which became part of the Deans family farm in the 1800s. The area was named Riccarton after the area the Deans came from in Scotland. Beginning in the 1880s the Deans began to sell the Riccarton property. The naming of the streets in the area was designed to showcase the Maori names of trees in keeping with the history of the area. For example Rata Street appears on a 1912 map and in street directories in 1914. One resident is listed.

**The City Council went to considerable effort in 2007 ( Consultation Letter April 2007) to reconstruct the streets to make the area known as the Kauri Cluster a community based area acknowledging amenity. In doing so the Council reinforced the street names by planting Kauri, Rata and Rimu trees on the newly established grass berms.** These trees are now of good size and the Rata trees have been in full bloom. I would be criminal if the fine landscaping carried out was destroyed. The area is a popular community amenity for walkers, cyclists, and indeed tourists as well as home for an established Farmers' market in the grounds of Riccarton House on Saturday mornings.

The wider area is tree-filled. Home to the many varieties of birds that connect with the Bush area. It contains numerous examples of quality character pre-war housing as well as a number of significant sites including Mona Vale, Britten Stables, original Riccarton Estate farm buildings, two war memorials, Christchurch Boys High School and, of course, the iconic and unique Avon River and Riccarton House and the last remaining area of original native Bush.

There are a number of studies on Neighbourhood Character (refs: Moonee Valley Character Study 2012, City of Moonee Valley, Victoria, Australia; Higham Ferrers Neighbourhood Plan - Preserving our Past and Enhancing our Future, September 2014; Higham Ferrers, East Northamptonshire, England. (<http://www.highamferrersneighbourhoodplan.org.uk>)) are two that have drawn extensively on other studies.

Of special interest is Chapter 3 in the Moonee Valley Report, WHAT IS A NEIGHBOURHOOD CHARACTER ( Appendix A). The basis of the Moonee Valley Report was the definition: **"Neighbourhood character is the qualitative interplay of built form, vegetation and topographic characteristics, in both the private and public domains that make one place different from another"**.

Access to open space is often considered an essential part of an area's character

The differentiation between different types of character areas is not simply a question of architectural style or era of development and certainly not dictated by a set of absolute rules. Neighbourhood character is also founded on the siting and building form of the area, and the way that the buildings interact with and relate to the landscape. These factors should be the basis for the

application of neighbourhood character policies. Neighbourhood character is not about the imposition of design styles. Rather it should be about recognising the distinctive characteristics of different urban forms and their relationship to topography and vegetation. Getting this right is the best way of maintaining and enhancing the sense of place of the municipalities' residential areas. Neighbourhood character descriptions and evaluations should focus on the preferred character.

The City Council invited and encouraged residents in 2015 to submit the area for the newly created Category 2 Character Area. On the basis of this encouragement considerable effort was made in a comprehensive submission. This was turned down.

At each time, our community strongly disagreed with the consultant's opinion. We still do. A methodology for assessing character and heritage should be a methodology the community can agree on. Character and heritage is not about ticking boxes. It is very much in the eye of the beholder and community views should always be given considerable weight. It is time for Christchurch planners to look elsewhere in the world for what constitutes character in the 21<sup>st</sup> century and is worth maintaining for the future. Will our grandchildren ask why the old photographs show an area that no longer exists because of draconian, not to say blinkered, planning.

The draconian and poorly planned development to the south of the Westfield Mall should give the panel food for thought as to what happens when unbridled development is allowed.

*Yes, RBK area needs to be designated a Qualifying Matter. Because of its significance to Christchurch, it needs protection. Riccarton is an historic part of Christchurch. The area is tree-filled. It contains numerous examples of quality character pre-war housing as well as a number of significant sites including Mona Vale, Britten Stables, original Riccarton Estate farm buildings, two war memorials, Christchurch Boys High School and, of course, the iconic and unique Avon River and Riccarton House and Bush. Leave these residential zones as they are.*

## 11-PLANNING SHOULD BE A TRANSPARENT PROCESS PROMOTING TRUST

I submit that the people of Christchurch have been subjected to a barrage of information including misinformation in a process designed to prevent discussion.

Request after request has been dumped on residents to respond to the requirement for consultation.

Very draining especially in a pandemic.

No wonder there is a deep suspicion that responses are ignored and that CCC staff simply proceed with their interpretation of policy.

Booklet after booklet comes out swamping the people who simply give up.

For example the “aspirational” pictures in the booklet showing wide streets with barely any on-street parked vehicles represent a far cry from reality. Christchurch streets are rapidly becoming parking lots thanks to the policy of “no off-street parking required” coupled with over densification of sites. No wonder the people have revolted.

On top of that residents seeking to participate have been discouraged by the submission procedure.

We are not professionals, full-time on this but we can read and think so notice should be taken of somewhat clumsy presentations.

## **CLOSING STATEMENTS**

**The overall impression of the proposed regulations is that of policy makers operating with the left-hand not knowing what the right-hand is doing. A good example of this is the no off-street parking regulation that flies in the face of converting the population to electric vehicles supported by incentives.**

**The commonly quoted mantra of “walk, cycle, public transport” again assumes everybody can follow this which is patently rubbish. Most certainly one should try to reduce vehicle use by these methods. Unfortunately Christchurch does not have a particularly convenient public transport system. There is no flexibility and the approach is, as often the case in New Zealand, in need of new visionary approach based on a different type of smaller-vehicle fleet together with a flexible approach to running a public transport system I suggest those involved start doing some serious reading on alternative systems as espoused in the many articles in Smart Cities Dive.**

**I myself cycled for 70 years in the UK and Christchurch. I have walked around New Zealand cities, towns and countryside and also around many places overseas. I have used public transport in many cities both home and abroad. I can no longer cycle because of health issues but still walk. I feel I have done more than my bit for the climate.**

**Apart from that does anyone realistically expect to follow that mantra with shopping, DIY, sports (especially with young children). You need a vehicle at least sometimes.**

**As I said, left –hand, right-hand, simply not enough thought typical of centralised decision-making. (The MIQ ballot software as another example).**

**Once again rushed legislation, not notified as policy when seeking election and being pushed through under cover of the more pressing issues of dealing with the Covid pandemic. Such legislation has proved time and time again to be full of holes and ill-conceived and naïve assumptions. MP Dr Duncan Webb has headlined “kicking poor law into touch” so why is his Government so keen to introduce more?**

**I can only hope sanity will prevail.**

**I always thought New Zealand was a good example of a democratic country but it appears we are seeing the erosion of basic democratic principles in Aotearoa New Zealand. Central control is the new reality with the concept that members of parliament are elected by the people, for the people to represent their constituency and hence their area (city, town, etc) replaced by sycophantic adherence to the party line.**

**Those seeking local body positions should also heed the coming wrath of the people.**

---

**AND THAT IS PRECISELY WHAT HAS SUBSEQUENTLY HAPPENED. THE PEOPLE OF CHRISTCHURCH HAVE SPOKEN THROUGH RESIDENT’S GROUPS RIGHT ACROSS CHRISTCHURCH. THE COUNCIL LISTENED AND IT IS TIME THE POLITICIANS DID.**

SNEAKING LEGISLATION IN HOPING NOONE NOTICES IS NOT TRANSPARENCY LET ALONE A PROPER DEMOCRATIC PROCESS

ONE SIZE DOES NOT FIT ALL – RECOGNISE THE DIVERSE NATURE OF CHRISTCHURCH. SAVE CHARACTER/HERITAGE FOR POSTERITY SO THAT FUTURE GENERATIONS CAN ENJOY AN ENVIRONMENT NOT CROWDED WITH CONCRETE, WHERE THERE IS COMMUNITY COHESION, WHERE IT IS A SAFE ENVIRONMENT FOR ALL, HUMANS, ANIMALS AND BIRDS, TO ENJOY.

**I for one would hope that my grown up children can enjoy the Christchurch they grew up in as well as the new fantastic environments, a mixture of new and old. I hope that will be the same for their children and all future generations.**



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 genderAge:  Under 18 years  18-24 years  25-34 years  35-49 years  50-64 years  
 65-79 years  over 80 yearsEthnicity:  New Zealand European  Māori  Pacific Peoples  Asian  
 Middle Eastern/Latin American/African  Other European  Other**\* Required information**Name\* Robert Leonard Broughton  
Address\* 25 Rata Street, Riccarton, Christchurch Postcode\* 8041  
Email bob@broughton.co.nz Phone no. 027 345 9478

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 RLBroughton Date 11/5/2023

My proposed Housing and Business Choice Plan Change (PC14) from Broughton, Robert Leonard

🔊 Seek Amendment

I seek the following decision from the Council

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

#### 1- FAILURE TO PROPERLY ASSESS SOCIAL IMPACTS

I submit the plan change should be reviewed once a proper social impact assessment has been completed. Amenity, liveability, community, well-being, should all feature as do what affects or even destroys them.

#### 2- SUNLIGHT PRESERVATION: SEEKING AMENDMENT TO THE QUALIFYING MATTER

I submit the Sunlight Qualifying Matter should be more conservative than proposed

#### 3- THE RICCARTON BUSH INTERFACE AREA (RBIA): SEEKING AMENDMENT TO THE QUALIFYING MATTER

I submit the **area known as the Kauri Cluster** should **not** be reformulated as existing in disjoint parts but retained as intended by the CCC remodelling in 2006 and all areas referred to in WSP's Putaringamotu Riccarton Bush Heritage Landscape Review (recommended for inclusion in the RBIA) should be limited to 2-storeys and remain **Residential Suburban density**.

**For myself this would imply the south side of Rata Street remain as currently zones – Residential Suburban**

#### 4- RICCARTON COMMERCIAL/RESIDENTIAL TRANSITION ZONE: A NEW QUALIFYING MATTER

The commercial area north of Riccarton Rd in the Riccarton centre should be height-restricted to a height that is appropriate given the proximity of low-rise residential dwellings immediately to the north.

#### 5- THE AIRPORT NOISE INFLUENCE ZONE: SEEKING AMENDMENT TO THE QUALIFYING MATTER

I submit that the properties on the southern side of Rata Street, should, for reason and consistency, all be included in the Airport Noise Influence Zone. Modelling is not an exact process and I fail to understand that, whilst the properties on the north side of Rata Street are in the zone, those on the south side some 20 metres away are not. Often when in my lounge at 25 Rata Street (on the south side of Rata Street) I experience substantial vibration and noise from planes flying low overhead that I have rushed outside to see if there was an issue. I can hear the noise from the testing of engines.

**I thus submit that for consistency both the north and south side of Rata Street be included in the Airport Noise Influence Zone.**

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

I submit the walking distances to Riccarton centre boundaries (which we understand the legislation states defines the extent of high density 6-storey residential zones) be reconsidered based, not on distance, but on time taken to walk to key amenities in the centre zone. The centre of Riccarton should be taken as the CCC Community Centre in Clarence Street.

This sits in the heart of the Riccarton centre with access in all directions to businesses.

#### 7- ON TREES -

Protections for mature trees is essential and incentives for planting more trees, should be part of the changes proposed in PC14. Any financial contributions made to compensate for tree removal should be required to be spent in the area where trees are removed to, at least, replace what was there with equivalent planting.

#### 8- PLAN CHANGES VERSUS CLIMATE CHANGE AND GEOSCIENCE

I submit that any plan changes under PC14 be subject to the over-riding strategies that the Council has put in place.

That account be taken of international moves to green, sustainable cities able to cope with extreme weather conditions. That account be taken of the geoscience pertaining to Christchurch.

#### 9- HOUSING AVAILABILITY AND AFFORDABILITY, PARKING

Do not embark on over-intensification that will destroy functioning, liveable communities. Already have so many multi-unit blocks with empty units so why impose more on areas that don not require more than the current level of densification. Sort the parking out – it is currently turning Christchurch streets into parking lots to the benefit of those developers seeking to maximise profit.

## 10- ESTABLISHING A PLANNED PUTARINGAMOTU-RICCARTON PRECINCT: A NEW QUALIFYING MATTER

I submit, in the absence of a properly assessed plan for intensification and development in Riccarton, the entire area represented by the Riccarton Bush Kilmarnock Residents' Association should be designated a Qualifying Matter, with current zonings maintained as agreed in the Christchurch Replacement District Plan Review of 2015, pending a comprehensive planning review.

This is a priority to preserve a character area of Christchurch for the future. Do not destroy what should be looked upon in the future as a slice of original and historical Christchurch

## 11-CCC PLANNING SHOULD BE A TRANSPARENT PROCESS PROMOTING TRUST

I submit that the people of Christchurch have been subjected to a barrage of information including misinformation in a process designed to prevent discussion. Request after request has been dumped on residents to respond to the requirement for consultation. Very draining especially in a pandemic,

## CLOSING STATEMENTS

## APPENDICES

LARGE CHARACTER HOMES – APPENDIX 5



NEWER HOMES



(Typically newer homes are large, fitting in with the design of older homes)

Television April 16, 2021

## A Living Hell: Apartment Disasters exposes the dire state of housing in Aotearoa

[By Jacqueline Paul](#)

Guest writer

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In this investigative documentary, John Gray and Roger Levie uncover the shocking truth about the dangerous state of many apartment buildings in New Zealand. (Photo: Sky)

**Looking to buy a unit or apartment? You might need to think twice or even three times, if this Prime documentary is anything to go by, writes Jacqueline Paul.**

If you are hoping to buy a home built between the late 1980s and the mid-2000s, there is a significant risk that it may be a leaky building. *A Living Hell: Apartment Disasters* spills the tea on who is responsible for designing and building such shitty housing in Aotearoa (spoilers: it's a *lot* of companies). If it achieves anything, it'll hopefully make you think twice

before putting your money down, whether for a standalone house or an apartment. As leaky apartment owner Olivia Goudie remarks ruefully at the end of the programme: “Personally, I would never buy an apartment or unit ever again.”

A Living Hell: Apartment Disasters, which aired on Prime this week and is available to watch [on demand](#), investigates the dire state of many apartment complexes across New Zealand. This is a show that many aspiring and first home buyers would do well to watch. Though, be warned, if buying during a housing crisis already has you anxious you’ll have even more sleepless nights after watching this.

New Zealand is one of the most unaffordable housing markets in the world, and [REINZ reported](#) in March 2021 that the median house price in New Zealand reached \$780,000. The [Demographia International Housing Affordability 2021 survey](#) recognised that New Zealand housing affordability has deteriorated significantly, with the cost of a median house now seven times the median income – compared to Australia at six and the United States at four. New Zealand incomes remain low, and house prices will continue to rise.

But do you actually know what you are buying? Don’t be fooled by the sky-high costs. Wait till you see the quality of builds in A Living Hell: Apartment Disasters.



One of the buildings that is put under the microscope in Living Hell. (Photo: Sky)

One of the leaky buildings featured is the St Luke's Garden Apartments in Auckland. The sprawling 285 unit complex was built between 2003 and 2011, making it a relatively new building to be affected by weather-tightness issues. The problems facing residents there are vast. Bevan Tse bought an apartment there in 2013; by the time he realised his mistake it was too late. He and his family have gone into debt to cover their share of the costs of remediation, estimated to be in excess of \$100 million.

In Wellington, the Sirocco apartments are in a similar shape. Systemic issues and leaky problems are projected to result in a repair bill of \$26 million, and many owners have sold at a considerable loss. The effects aren't just financial, but emotionally scarring too; bodycorp chair Sudhir Motwani notes that he's been racially abused multiple times as he tries to find a solution to the massive challenge all Sirocco apartment owners face.

The documentary has two key takeaways. The first is the severe issues with monitoring and regulatory standards of construction in New Zealand. If construction, regulatory and monitoring issues are not addressed, there will be further challenges in the housing system. Given the ongoing shift towards denser cities and the increase of people living in urban centres, this is an urgent problem to fix. We need structurally sound, good quality medium to high-density apartments in urban centres instead of sprawling cities and standalone dwellings.

The second is the legal framework and governance matters of apartment complexes. It's likely that many people still do not know what they are buying when it comes to apartment buildings. When you buy a unit title to an apartment, you usually become a member of the body corporate, consisting of all that building's owners. Many owners don't understand the complex nature of governance and management of apartment complexes, nor the likelihood that the bodycorp relationship can become antagonistic and dysfunctional.

At the Sirocco apartments, the body corporate fee for a recently sold apartment is \$7,950.51 per year. But where should this money go, and who is entitled to a share? As one former Sirocco owner recalls in the documentary, a dispute broke out between apartment owners with balconies and some of those whose apartments were balcony-free: those without them complained they shouldn't have to pay for damage to balconies they did not own. The problems with the owner/bodycorp relationship go far beyond the leaky building issue, and that's something Nicola Willis' [Unit Titles \(Strengthening Body Corporate Governance and Other Matters\) Amendment Bill](#) is trying to address. [Submissions are open until 29 April](#) and I strongly encourage you to submit if you are experiencing significant issues with your body corporate.

One issue I have with A Living Hell is that it approaches the issue from a very Pākehā perspective, engaging in the typical dialogue that housing is primarily investment asset. It would have been great to include a broader range of experiences from young people and larger families of ethnic backgrounds to shine a light on other living dynamics in apartments. The rhetoric around the housing crisis continues to be dominated by economic and political concerns and it would be valuable if the documentary had explored cultural inequities such as dwelling types and health and wellbeing impacts.

You'll come away from A Living Hell: Apartment Disasters better informed about the leaky building issue, but it may not provide you with the security you hoped for. As long as developers and builders are focused on profit more than people, you'll need to do your



research and seek further expertise before buying any home. Do your due diligence. My advice: don't buy into the hype and make sure you know what you are buying, warts and all.

*A Living Hell: Housing Disasters is available to watch on SkyGo and PrimeTV [here](#).*

*Jacqueline Paul is a researcher at Ngā Wai a Te Tūi Māori and Indigenous Research Centre, and lecturer at the School of Architecture in Landscape Architecture at Unitec Institute of Technology. She is currently based in the United Kingdom to pursue a Master of Philosophy in Planning, Growth and Regeneration in the Department of Land Economy at the University of Cambridge.*

*The Spinoff's television section is brought to you by Panasonic.*

## **A LIVING HELL: APARTMENT DISASTERS**

It was heartbreaking to see this documentary in its entirety last night; the human cost of systemic failure in just one troubled sector of the Building Industry was laid out for us all to see.

People whose lives have been wrecked by their 'lifetime investments' being leaky and structurally unsound 'lemons'! In some cases these are people who have moved to NZ from untenable situations in their home countries; have worked hard to find employment and settle their families somewhere 'safe' and become contributing members of NZ society. In other cases these apartments were investments for people approaching retirement; a way to support themselves in old age. For others, NZ residents making their first home purchase. Yet another group being the high-end purchaser who discovers their million dollar apartments are practically worthless.

**No story is a good one.**

CLIMATE

# Green infrastructure helps cities with climate change. So why isn't there more of it?

April 15, 2022 5:05 AM ET

Heard on [All Things Considered](#)

[LAUREN SOMMER](#)



Climate change has already made storms more intense, flooding cities with more rainfall than they were built to handle.

*Josh Edelson/AP*

Federal agencies are beginning to hand out billions of dollars in infrastructure spending, the largest investment ever made in the country's water system. Much of it will go to improving pipes, drains and stormwater systems. But some scientists and urban planners are pushing to fund projects that are better adapted to the changing climate.

Instead of just gray infrastructure, supporters say the answer is green.

Green infrastructure, whether it's large rain gardens or plants along a street median, has the same purpose as big storm sewers: to manage large amounts of water that can build up during heavy rains. Plants and soil absorb and slow runoff from rainstorms, while a stormwater drain captures water that runs down a street gutter and diverts it underground into pipes.

On a hotter planet, storms are getting more intense, and rainfall is often heavier. Flooding is on the rise in many cities. Stormwater systems are being increasingly overwhelmed by extreme rainfall. In the Northeast, the heaviest storms [produce 55% more rain today](#) compared to 1958. Last year, dozens of people drowned there when the remnants of [Hurricane Ida flooded basements, streets and cars](#).

#### **Sponsor Message**

Still, most cities face major backlogs in maintaining the aging gray infrastructure they already have, amounting to billions of dollars nationwide. In the rush to secure federal funding to fill that void, some worry that green infrastructure will be left by the wayside.

"What good is a pristine road that's flooded?" says Marccus Hendricks, assistant professor of urban studies and planning at the University of Maryland. "Elevating the priority of green infrastructure and stormwater systems is critical."

## **How rain gardens help stormwater systems in storms**

Downtown Oakland, like a lot of major cities, is mostly a hardscape of concrete. Still, on one block, the sidewalk is lined with a long strip of native California plants.

"I feel so great looking at this," says Joshua Bradt, a project manager for the San Francisco Estuary Partnership. "I love that the plants are alive. They seem to be thriving."

Bradt helped bring this rain garden to life, part of a [\\$4 million dollar project](#) to add green infrastructure to a major thoroughfare in the east San Francisco Bay Area.

When rain storms hit, the water is funneled into the rain garden from the street and sidewalk. As it soaks into the soil, it prevents that water from rushing to the stormwater drain on the corner.

In big storms, that alleviates the pressure on the stormwater system, since those drains and pipes can only handle so much water at once based on their size. When storm drains are overwhelmed, water pools in the street and can inundate buildings.

Bradt says even small rain gardens can make a difference in slowing the runoff that causes flooding. They also have the added benefit of filtering runoff to improve water quality.



Joshua Bradt looks over a green infrastructure in downtown Oakland. During storms, water from the street and sidewalk is funneled into the rain garden.

*Lauren Sommer/NPR*

### **Cities struggle to get green infrastructure built**

Green infrastructure can also help when it's not raining. [Summer heat waves are often more dangerous in cities](#), because concrete absorbs and radiates heat in what's known as the "urban heat island" effect. Plants and parks can provide much needed cooling.

"If they were on every corner, it would make a tremendous difference," Bradt says. "The reality is that a lot of city departments are already overwhelmed, and this is a hard ask."

While both gray and green infrastructure require upfront funding for construction, green infrastructure also requires ongoing maintenance to keep the plants healthy and clean up litter. Even if cities can secure funds to build the projects, maintenance generally isn't included. They face adding that to their annual budget, which can turn out to be a hurdle for doing green infrastructure.

In addition, the most cost-effective time to build green infrastructure projects is when cities are already doing road or construction work. But because the projects are often managed by different departments, coordination doesn't happen.

"It's becoming more standardized and definitely more accepted," Bradt says. "However, I will say there just is not yet a mass movement towards this, because of how institutionalized and siloed infrastructure management and investment is."



A utility hole cover bubbles open in a road flooded by the remnants of Hurricane Ida. Across the U.S., millions of miles of pipes and stormwater infrastructure stretch below city streets. Most are decades-old, designed for the storms of last century.

*Ted Shaffrey/AP*

### **Bigger storms are already overwhelming cities**

Whether cities spend on gray or green infrastructure, a hotter climate is adding huge costs to their budgets.

"Our challenge with climate change is that we're seeing these big events," says Lauren McPhillips, a water engineering professor at Penn State University. "We're seeing massive amounts of water that we need to be able to control."

Across the U.S., millions of miles of pipes and stormwater infrastructure stretch below city streets. Most are decades-old, designed for the storms of last century.

Even today, [cities lack updated rainfall data that reflects how storms are getting more intense](#). That means they're still building new projects without climate change in mind. Federal officials with the National Atmospheric and Oceanic Administration say the agency hopes to begin the process of creating new rainfall forecasts next year. Still, that information isn't likely to be ready in time for cities to use it for the new wave of federally funded infrastructure projects.

Planning for heavier downpours means building larger stormwater systems, but replacing miles of pipes and upsizing existing infrastructure is far more expensive than cities can afford. Experts say green infrastructure can reduce the need to replace as much gray infrastructure. If rain gardens absorb some of the runoff, stormwater pipes don't need to be as large.

That makes green infrastructure potentially more cost-effective. A New York City study looked at using a combination of gray and green infrastructure in one neighborhood in Queens and found that [using gray infrastructure alone would be twice as expensive](#). Still, a handful of rain gardens won't be enough to prevent flooding, experts warn.

"The challenge is that we need this at scale," McPhillips says. "And especially in these older cities that have built out a lot of hard surface and have gotten rid of the ability for soils to naturally soak in rain, we have a lot to get back to correct for those issues."

Flooding is especially problematic in low-income neighborhoods and communities of color, which generally have fewer parks and where the infrastructure is often more neglected

"The fact that the majority of communities of color lack sufficient green space compared to their white majority counterparts – that is still a problem," says Fushcia-Ann Hoover, who works on green infrastructure at the University of North Carolina at Charlotte. "And so I think that green infrastructure does provide a possible solution."





Replacing concrete with green plants, like this project in Emeryville, Calif., can help overwhelmed stormwater systems handle increasingly bigger rainstorms.

*Joshua Bradt*

## As infrastructure spending begins, green projects could be just a "stepchild"

Over the next five years, the Environmental Protection Agency will give states more than \$11 billion for water infrastructure projects through the Clean Water State Revolving Fund. In March, the [EPA released guidance](#) encouraging those funds be used in disadvantaged communities and that states take climate change into account.

"Most cities think about the green and the gray separately, but really the power is integrating these two things," says Radhika Fox, assistant administrator for the EPA's Office of Water.

Still, under guidance from Congress, only 10 percent of the funding must be spent on green infrastructure or water efficiency projects. The last time the government provided a big infusion of infrastructure funds in 2009 [the requirement was for 20 percent of projects to be green](#).

The EPA also emphasized that states have discretion and flexibility to spend the funds as they see fit. The Biden Administration has already gotten pushback from Republicans about encouraging states to consider climate change in spending infrastructure dollars. In February, top Republicans [sent a letter](#) encouraging states to ignore similar guidance from the Department of Transportation.

"It does put states in the driver's seat in terms of identifying and working with communities within their borders to find infrastructure projects," Fox says.

The need to repair and upgrade gray infrastructure may take priority over green projects in many communities. In 2020, municipal utilities faced a funding shortfall of \$8.5 billion, according to a study from the Water Environment Federation.

"Stormwater systems, green infrastructure and other systems that are tied to the climate crisis have been a stepchild to the types of systems we pay attention to," Hendricks says.

# Time running out to save Christchurch's trees from housing intensification

Tina Law 05:00, Mar 05 2022

- 
- 
- 



*Supplied*

A bleak-looking Chester St East in the 1980s on the left. Now it is leafy and green.

**Christchurch is the Garden City and has been for years, but its leafy status is under threat as more trees get the chop to make way for intensified housing. TINA LAW looks at what, if anything, can be done to protect the city's green canopy.**

Forty years ago an inner-Christchurch street was a sea of grey asphalt, its appearance so bleak that some described it as a slum.

Fast-forward to 2022 and Chester St East is now one of the central city's most charming roads, the area transformed by well-established trees and grass verges.

Yet many other streets in Christchurch remain grey and dominated by concrete – not a good look for a city that [wants to become a National Park City](#).

**READ MORE:**

- \* [Christchurch's leafy status under threat, urgent action needed to protect city's tree canopy](#)
- \* [Can Christchurch build up instead of out without spoiling the Garden City?](#)
- \* [City council pushes for change to Government's new housing rules](#)
- \* [Christchurch may not be as green and leafy as you think](#)
- \* [Flooding work approved after councillor digs unauthorised trench](#)

There are growing fears the number of streets devoid of trees will only increase as the Government brings [in new rules allowing greater development and intensification](#).

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Time is running out to protect the trees that are there, and Christchurch City Council needs to act now to protect its remaining trees, city councillor Yani Johanson says.

One resident has raised the idea of ratepayers paying a separate annual levy to help beautify the city's grey areas. While the proposal has received support from some quarters, others say the council should be prioritising this work as part of its normal budget.

Christchurch is starting from a relatively low base when it comes to tree coverage, especially when compared to other cities.

A [recent survey](#) shows about 13.5 per cent of the city is covered by tree canopy. This is lower than in 2015/16, when it was 15.6 per cent.



*JOHN KIRK-ANDERSON/Stuff*

Hornby has the least tree coverage of any ward in the city, with just 6.5 per cent of the area covered with a tree canopy, a point starkly obvious when looking at Neill St.

The figures are based on data collected in 2018/19, and Johanson suspects the actual tree loss now will be much greater, possibly double, given the number of trees that have been cut down to make way for housing intensification.

The lack of trees is most stark in some of the city's lowest socio-economic areas like Hornby and Linwood, where the tree canopy coverage sits at just 6.5 per cent and 8.9 per cent respectively.

Compare that to some of the city's more affluent suburbs, which have the highest tree cover.

Cashmere is sitting at 21 per cent and Fendalton at 19 per cent. The Coastal ward, which stretches from Southshore to Brooklands, has 27 per cent coverage, but that includes Bottle Lake Forest. The survey does not include Banks Peninsula.

The council says some loss reflected in the survey is due to trees being felled at plantation forests at Bottle Lake, Chaney's and McLeans Forest. Only trees taller than 3.5 metres were counted in the survey, and replanted trees are not yet tall enough to be counted.

The city also lost a significant number of trees on [the Port Hills due to the 2017 fire](#).

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Auckland had a canopy coverage of 18.4 per cent between 2016 and 2018, and in Wellington the tree canopy coverage was about 30.6 per cent in 2019.



*JOHN KIRK-ANDERSON/Stuff*

A decent tree canopy covers Rose St in Somerfield, a suburb next to Cashmere. The ward has 21 per cent tree coverage.

Christchurch-based ecologist Colin Meurk, who works for Canterbury and Lincoln universities and Manaaki Whenua - Landcare Research, says it is not surprising more hilly cities like Auckland and Wellington have higher tree canopy coverage, because they have gullies where trees can grow and that are unsuitable for housing. Yet in a largely flat city like Christchurch, every square metre could potentially be developed.

Meurk says we need to bring nature into our cities and connect it with where most people live.

Many community groups have done plantings along the city's rivers, parks, hills, coast and around wetlands and while this is happening under the radar, those trees will begin to visibly flourish over the next decade, he says.

However, it appears the city has come a long way from when the early settlers caught a first glimpse of their new home from the Bridle Path track.

Christchurch forest ecologist Mark Belton says the city was a desolate place back then, almost entirely devoid of trees. Only tiny remnants of forest were visible, at Riccarton and Papanui.

The Deans family secured protection of Riccarton Bush in 1849 and the area is now home to the city's oldest trees, which Belton says existed around the same time as the moa, seven centuries ago.



*ALDEN WILLIAMS/Stuff*

Riccarton Bush is home to Christchurch's oldest trees.

Settlers then went about planting tree species from their homelands and Christchurch now has the greatest variety of tree species of any city in the world, Belton says.

He believes that is worth “celebrating, conserving, enriching, and extending with further plantings”.

### **Intensification threat**

There are more than 1100 protected trees on private land across Christchurch, but there used to be a lot more.

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About 530 were removed from the protected list in 2016, giving property owners the right to cut down a previously protected tree without a resource consent.

The council signalled in 2015 it wanted to take more than double that number off the list, but the plan was widely criticised by residents and environmentalists.



*JOHN KIRK-ANDERSON/Stuff*

Crs Yani Johanson and Pauline Cotter want the city council to take urgent action to protect Christchurch's tree canopy before it is too late.

The council then introduced a new assessment system, which meant 530 did not meet the new thresholds around health, structure, or shape.

During the past 12 months the council has received five applications for trees to be removed from the protected list, and it accepted all five.

All street trees taller than six metres and park trees higher than 10m are protected under the district plan.

There are more than 20,000 street trees and 18,000 park trees in Christchurch. About 19 per cent of publicly-owned land in Christchurch is covered by trees.

So the city does appear to have a lot of trees, but it is the [threat coming from a Government push to intensify housing that has many worried](#).





*CHRIS SKELTON/Stuff*

Work is under way to clear an area for a new development on the corner of Cambridge Tce and Manchester St.

New rules will allow intensification to spread across most of the city, rather than just the central area and a select few suburbs.

There are fears this intensification will spell the loss of trees as single homes with large sections are transformed into dense collections of properties with few trees.

From August buildings of up to three storeys will be allowed on most city sites without any need for resource consent. This applies to landowners in Auckland, Hamilton, Wellington and Christchurch.

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The Government's new law will require 20 per cent of the multi-resident complexes to be landscaped with grass or plantings, but does not include an existing regulation for minimum tree heights.

The [city has already lost a number of trees to multi-unit developments](#).

Johanson has been asking the council since it developed its tree strategy more than a year ago to prioritise changes to the District Plan to provide greater protection of existing trees, but he says nothing has happened.

The policy sets out how the council will manage and maintain trees in public spaces.

One of its key tenets is that for every tree removed a minimum of two new trees will be planted, and they must replace the lost canopy cover within 20 years.



*Christchurch City Council*

Christchurch City Council has produced an artist's impression of what a typical Christchurch suburb could end up like under new housing density rules being pushed through by the Government.

But Cr Pauline Cotter points out that while the two-for-one policy is good, once a mature tree is cut down it takes many years for a tree to reach the same stage of maturity to provide the environmental and climate change benefits.

Christchurch mayor Lianne Dalziel told a council meeting last week that people needed to realise there were two governments that changed the Resource Management Act (RMA), and they did so to take away the ability for councils to protect trees on a blanket basis.

After the meeting she said the council used to be able to send in an arborist to look at trees and protect them before work on subdivisions started. The law does not allow it to do that now.

Cr Sara Templeton says she is getting information together to ask Local Government New Zealand to lobby the Government to reintroduce some of the tree protections that were taken out of the RMA.

She says she understands the need for greater density housing, but believes tree cover needs protecting too.

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Mature trees tend to be planted at property boundaries, Templeton said, so she believes developers should be able to work around them while still building density.

Why Christchurch should become a National Park City

*CHRIS SKELTON/STUFF*

Hayley Guglietta is keen to galvanise Cantabrians to get behind the idea of creating New Zealand's first National Park City. (First published August, 2021)

The council is also working on a separate plan to boost its tree canopy, but Johanson is frustrated at the time it is taking. The clock is ticking.

A draft Urban Forest Plan is due out sometime in the first half of this year, according to council staff.

They say it will provide “a long-term vision and strategy to maximise the health and sustainability of the city’s urban trees and forests and the benefits we receive from them”.

It will include targets for the city such as tree canopy cover and species diversity and will have a list of actions required by the council to ensure it meets those targets.

The draft will be put out for consultation before being confirmed, so it is unlikely to meet the end of June deadline for the council’s 2022/23 budget.

Despite this, trees are still being planted across the city and money is being spent on them.

The council has budgeted \$430,000 this financial year to spend on tree planting, mostly to cover the two-for-one policy.

This figure, the council says, does not take into account tree-planting associated with specific projects like cycleways, nor does it include the extensive planting happening in the residential red zone and other joint projects with various groups along the Styx River catchment and the Summit Rd.

There is also another plan which is already operational and is starting to make a difference in an area that really needs it.

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### *Supplied*

Dawson Lane off Chester St East is now a pleasant place to stroll, a far cry from its run-down aspect in the 1980s.

Greening the East is the brainchild of former city councillor and community board member [Sally Buck](#), who died in 2020.

The plan was approved in 2021 and its aim is to ensure residents in an area bordered by Fitzgerald Ave, Cashel St, Avonside Dr and Linwood Ave, can “connect to and be enriched by a green, biodiverse and healthy neighbourhood”.

Cr Jake McLellan says Linwood is an area that has been left behind, with plenty of high-density units and lots of concrete.

He says the Greening the East plan will see more trees, green corridors, walkways, pocket parks, nature play areas and spaces that encourage biodiversity, as well as greater maintenance levels of green spaces.

It is an ambitious plan, he says, and one that will be rolled out over the next decade.

He is determined for it not to sit on a shelf gathering dust, and says lots of work is already under way.

Linwood has already been affected by intensification and is likely to continue to be for the foreseeable future, so the plan aims to counter some negative effects of that.



*Dean Kozanic/Stuff*

Christchurch-based ecologist Colin Meurk says we need to bring nature into our cities and connect it with where most people live.

Greening the East has already resulted in increased maintenance at local parks, extra park seats and picnic tables being installed, as well as additional plantings at Worcester Corner Reserve, McLellan says.

About \$172,500 has been budgeted for each of the next two financial years to help fund the plan. The money needs approving during the annual plan process, but it is already sitting in the draft budget about to go out to consultation.

It will go towards planting 40 street trees on Cashel, Hereford, Worcester and Gloucester streets.

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McLellan believes the plan could be rolled out as a gold standard model for how the council can mitigate the effect of future intensification in other areas of the city.

Chester St East is a great example of how community lobbying, political will and public money can make a difference in the look and feel of a place.

Central city resident Simone Rewa Pearson says before and after photos of the street show the power of what the council can do if it has sufficient funds.

## Specialist tree fund

She suggested the council adopt a “beautify Ōtautahi levy”, similar to the Christ Church Cathedral levy, but it would instead be used to increase tree coverage.

Templeton says there is precedent for such a levy with [Auckland mayor Phil Goff proposing a climate charge](#), and Dalziel says it seems like a good idea but would need more investigation.

Heritage campaigner [Dame Anna Crighton](#) says while she is concerned at the number of “beautiful large trees” getting bowled over for developments across the city, she believes the council should front up with the cost to beautify the city itself.

[More from  
Tina Law • Senior reporter  
tina.law@stuff.co.nz](#)

She supports Templeton’s push to get the Government to reinstate some tree protections taken out of the RMA, but is not too keen on Pearson’s levy idea.

Crighton successfully campaigned to get poplar trees planted by [Thomas Edmonds](#), of “Sure to Rise” baking powder and cookbook fame, protected. He was born in Poplar, London.

[Mayoral candidate Phil Mauer](#) does not like the levy idea either, and believes the council should be doing the work itself rather than calling on residents for extra cash.

But he is also advocating for the council to cut down some trees.

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Mauer is quick to point out he thinks the city should retain as many trees as it can, but he wants street trees that are causing problems to go – and it appears there are quite a few of them.



*JOHN KIRK-ANDERSON/Stuff*

Tessa Whitaker, 9, loves climbing trees, and her mother, Maja Whitaker, would like to move to Cashmere for that reason.

Mauger has amassed dozens of photos of footpaths, kerbs and wastewater pipes damaged by street trees with shallow roots.

He says some subdivisions built in the 1980s had unsuitable trees planted, and now they are causing problems for residents and they should go.

“If some old bugger goes outside down the road and trips over and breaks his jaw, we are in the gun.”

Mauger says he gets lots of complaints from people about damage caused by trees.

“I’m not against trees, just the ones that are causing grief.”

To make up for ones cut down he suggested the council could plant more trees at Rawhiti Domain and in Brooklands, which was partly red zoned after the earthquakes.

## **Don’t miss important Christchurch news**

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So why do we care so much about trees?

Belton says it is well documented that mental health and well-being in urban areas are correlated with a strong presence of trees.

“Trees provide privacy and shelter, and screen much of the ugliness of our built environments.

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“Imagine your neighbourhood devoid of trees.”

Unfortunately for some, they do not have to imagine.

\*In an earlier version of this story some of Mark Belton’s comments were incorrectly attributed to Colin Meurk.

### **No news is not good news, Canterbury**

Our ever-changing region has many exigent stories to tell. Petrol and grocery prices are putting huge pressure on families. We have an opportunity to become a national park city. Our much-needed new stadium is opening on the First-of-Never. There's a relentless stench haunting our lives.

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What are the negative impacts of high-rise buildings?

High-rise buildings **degrade the thermal environment of their surroundings through wind turbulence, cooling, and excessive heating.**

Among the most obvious of high-rise building issues, **fire safety and security** are the most concerning.

The people living in multi-storey buildings **do not have more space**. It has too many stairs, so people use a lift to go to their rooms. If they caused any short circuit, they have to use stairs. They then to face problems such as carrying shopping. Dealing with young children.

Several [recent studies](#), for example, suggest that during the outbreak of highly infectious disease, high-rise dwellers on all floors are at higher risk than people living in single or detached homes.

Currently, those of us living in large apartment buildings worry about increased exposure to coronavirus when you consider the number of residents touching door handles and elevator buttons, though most buildings have notified tenants of increased cleaning protocols. As [6sqft recently explained](#), some property management companies and landlords have banned moves during this time and are not allowing large packages that require the use of the elevator to be delivered.

Then there are the mental health issues to consider. Australian architect Kerry Clare [warned in 2016](#) that high-rise living is harming Australia's "urban fabric" by isolating people from street life. According to Clare, more people living in high-rise buildings means more people living in social and economic silos where the chance encounters of street life are severely compromised. In many respects, Clare's position resonates with the thinking of New York's own [Jane Jacobs](#). In her 1961 classic, *The Death and Life of Great American Cities*, Jacobs condemned high-rise living, especially when used as a low-income housing solution. "The corridors of the usual high-rise, low-income housing building are like corridors in a bad dream...creepily lit, narrow, smelly, blind." Jacobs further lamented, "They feel like traps and they are. So are the elevators that lead to them." The social isolation that Clare and Jacobs both associated with high-rise living is often linked to depression and other mental health problems.

Petition update

## Disappointingly the City Council voted to adopt the Governments flawed housing intensification plan



**Greg Partridge**  
New Zealand

Mar 1, 2023 —

In case you haven't heard through the media already, the Christchurch City Council voted HEAVILY in favour of adopting a modified version of the governments heavily flawed widespread housing intensification plan.

This modified housing intensification plan will now impact 56% of properties across our city neighbourhoods and her suburbs.

This was after government appointed investigator John Hardie threatened the City Council the government might impose an even worse version of the plan our Council have created if they were to reject the government's plan and vote "NO!" to adopting it for a second time, an historic move the Christchurch City Council first made in September 2022.

[www.rnz.co.nz/news/national/474708/christchurch-city-council-votes-against-introducing-government-housing-plan](http://www.rnz.co.nz/news/national/474708/christchurch-city-council-votes-against-introducing-government-housing-plan)

To be fair it must be acknowledged the Councils modified plan includes recession plane rules more in line with sunlight angles here in Christchurch than the Government's Auckland-based rules.

Even under the revised plan however, ground floor homes situated next to the newly permitted much taller buildings being erected under the new rules will have their sunlight blocked for three months of the year. That will invariably forcing up heating costs during winter for many vulnerable residents (including the elderly) who are already struggling to pay rising electricity bills during a cost of living crisis.

The modified plan permits the construction of three, three-storey homes per property across more than half of Christchurch without a resource consent, suffocating neighbouring property owners from any rights to lodge an objection with the Council.

It also allows six-storey buildings within 600 metres of main shopping areas in our suburbs, and four storeys near smaller shopping areas, all without a resource consent.

Encouragingly most Councilors said they did not agree with the plan being imposed on our city by the government. Many voiced their feeling that the risk of not adopting it was too great given the treat outlined by the Government.

Mayor Phil Mauger said the Council had “run out of road”, and the Government had given “a clear signal”.

Deputy Mayor Pauline Cotter agreed the housing intensification “will not lead to improved affordability”, and she worried about shading. However, she said the council was “between a rock and a hard place” and the risk of Government taking over was too great.

Councilor Yani Johanson was opposed to the plan. He said evidence showed there was “nothing in this plan change would lead to any significant difference in housing affordability”.

“I am concerned that there hasn’t been an adequate social assessment of what is proposed ... if we get intensification wrong, that will lead to poor outcomes in our community.”

Most Councillors said they were torn in their vote, with several saying the plan was far from perfect, but they were left with no choice and it was time for the public to have a say.

Councillor Mark Peters (Hornby) said Christchurch was being bullied by central Government, and Councillor Tim Scandrett (Cashmere) said he was “really disappointed in Wellington” [the Government] but the council had little choice.

Despite the warning, three City Councillors still voted against it:

- Mark Peters - Hornby
- Aaron Keown - Harewood
- James Gough - Fendalton

There is still the possibility of a reprieve however, and for the voice of the public to be heard through a Hearings Panel, to which submissions can be lodged up until 28 April.

This petition will be included in those submissions, so please share it with as many people as you possibly can in order to increase the numbers who have signed it and for the voice of Christchurch residents to be fully heard by the Government in what is supposedly a democratic society.

Thank you

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## Historic earthquakes

Canterbury's most severe earthquake prior to these occurred on 1 September 1888 about 100km north of Christchurch in the Amuri district. It is recorded as a [magnitude 7.1 earthquake](#), but reached magnitude 9 at its epicentre. Extensive vertical and horizontal ground movement caused considerable damage to buildings and land. The quake badly [damaged the spire of the Cathedral](#) as well as buildings throughout Christchurch.

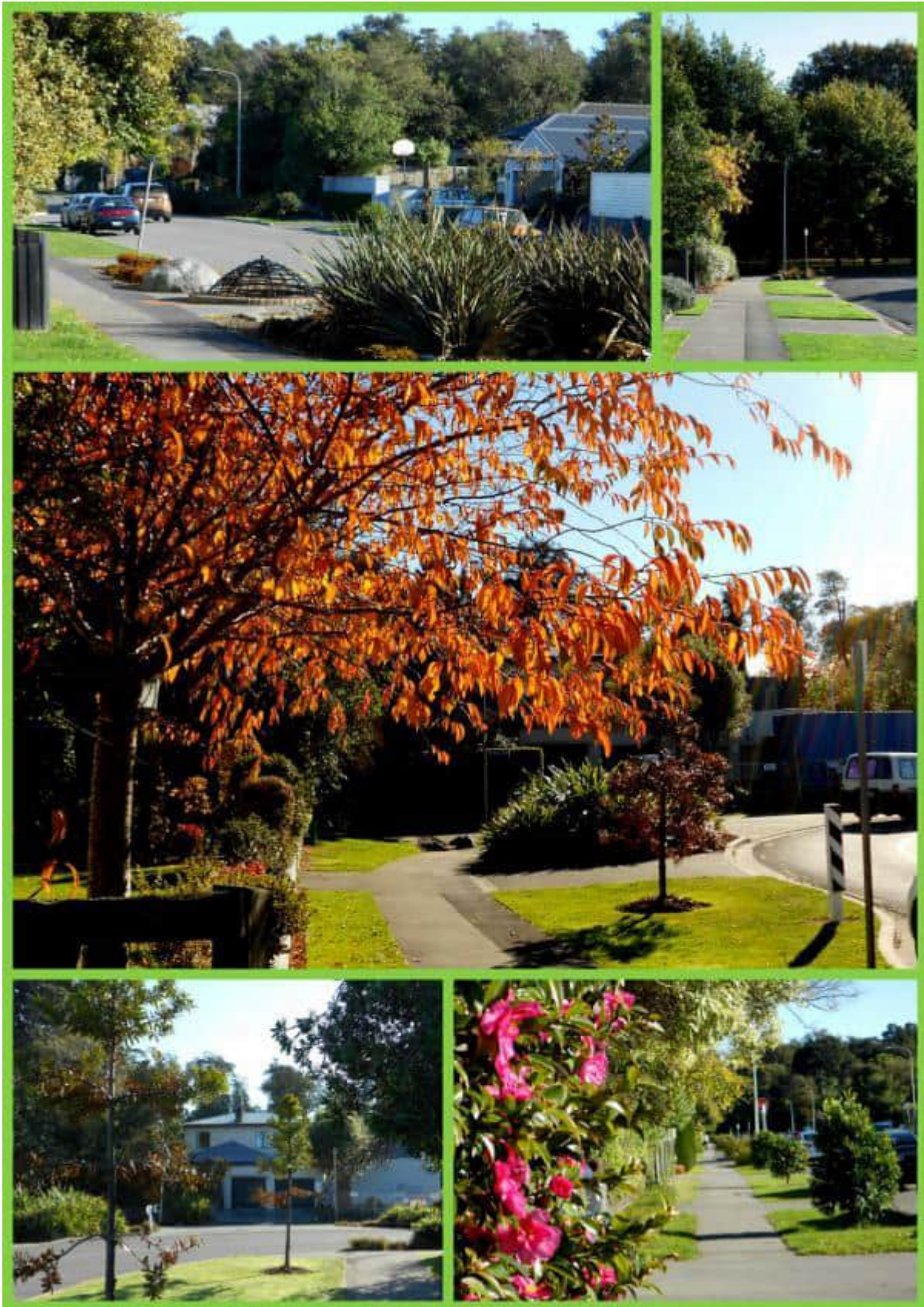


Some of the destruction by earthquake at Cheviot, North Canterbury, 16 Nov. 1901 : back of McTaggart's butcher/baker shop. [17 Nov. 1901] [CCL PhotoCD 5, IMG0067ChristChurch Cathedral](#) was damaged by three quakes during its construction – [1881](#), [1888](#) and [1901](#).

STREETSCAPES - ENTRIES TO PRECINCT – APPENDIX 3



## PARK-LIKE STREETSCAPES



(Enjoyed by the many pedestrians who pass through en route Riccarton shops and Riccarton )

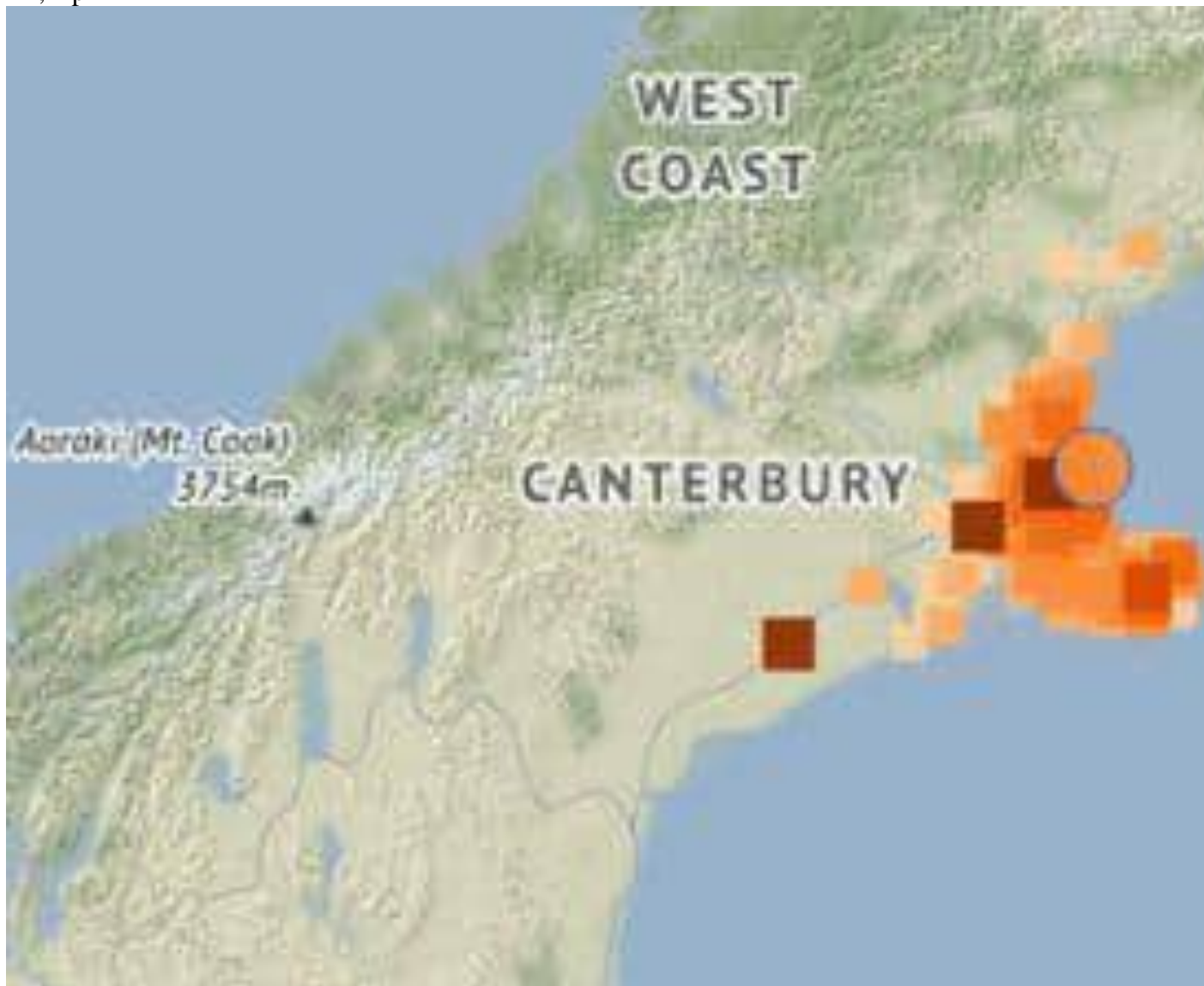


<https://nzhistory.govt.nz/keyword/earthquake>

<https://my.christchurchcitylibraries.com/christchurch-and-canterbury-earthquakes/>

Early morning quakes rattle Christchurch

Fri, Apr 21



A series of quakes have struck north-east of Christchurch this morning. (Source: GeoNet)

Thousands of people in Christchurch have been jolted awake after a series of three earthquakes struck early this morning.



---

A 4.0 magnitude quake struck 10 km north-east of Christchurch about 2.20am. The quake came at a depth of nine kilometres, causing moderate shaking, according to GeoNet.

It was followed by a second, 3.6 magnitude quake 10 km north-east of Christchurch at 7.31am. The light earthquake came at a depth of 10 km.

A third, 4.3 magnitude quake 10 km north-east of Christchurch followed nine minutes later, at 7.37am. The moderate quake had a depth of eight kilometres.

There were around 15,764 'felt reports', most of whom reported weak to light shaking, GeoNet said.

# Slow grow: Christchurch's urban forest will take decades to form

Will Harvie05:00, Feb 10 2023

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- [12](#)



*ALDEN WILLIAMS/Stuff*

Cashmere is one of the greenest suburbs in Christchurch with trees covering one-fifth of the land area.

**ANALYSIS:** An ambitious proposal to cloak one-fifth of Christchurch in trees by 2070 recommends doubling the proportion of tree-lined streets and tripling tree numbers along the city's rivers and streams.

That's the gist of the council's draft [Urban Forest Plan](#), which was released for [public consultation](#) last week.

The document is 32 pages of ideas on how to grow the Garden City's "tree canopy" – defined as trees 3.5m and higher and measured by an aerial surveys.

## ADVERTISING

And here's the thing: It will be hard and take decades to achieve even modest improvements.

### READ MORE:

- \* [Time running out to save Christchurch's trees from housing intensification](#)
- \* [Christchurch's leafy status under threat, urgent action needed to protect city's tree canopy](#)
- \* [Christchurch may not be as green and leafy as you think](#)

For example, the 600-hectare residential red zone has a tree canopy covering about 10% at the moment.

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If the red zone canopy was increased to 80% – the sort of thing that dreamers and doers hope to achieve – Christchurch's total canopy cover would increase [by 1.09%](#).

That small improvement is absolutely worth achieving, but wouldn't propel the Christchurch into the heights of tree canopy glory.

Auckland's tree canopy is 18% and Wellington's 30%. Christchurch City Council staff want to be above 20% by 2070. However, as the report explains, this requires human intervention as Christchurch has "very little natural regeneration" unlike Auckland and Wellington which were primarily forested areas prior to European colonisation.

It was about 13.6% in 2018-19, down from 15.6% in 2015-16, according to a [2022 report](#) by University of Canterbury urban tree expert Dr Justin Morgenroth.



*ALDEN WILLIAMS/Stuff*

Some of Christchurch's lower income suburbs also suffer from having fewer trees.

So, how does the council hope to regrow the city's forest, not including Banks Peninsula?

Rather obviously, plant way more trees. Mostly native trees but not exclusively.

But 57% of land in Christchurch land is privately owned. The plan isn't to compel owners to plant trees capable of reaching 3.5m or more.

Rather, the plan is to plant public land much more intensively. The tree canopy in public "open spaces" is about 23% now. They want it to be 40% by 2070.

Increased tree numbers can help the city cope with climate change, the report explains. For instance, on a 30C day in Christchurch, roads and footpaths can reach temperatures in excess of 50C. "Under trees, those same surfaces can be more than 20 degrees cooler."

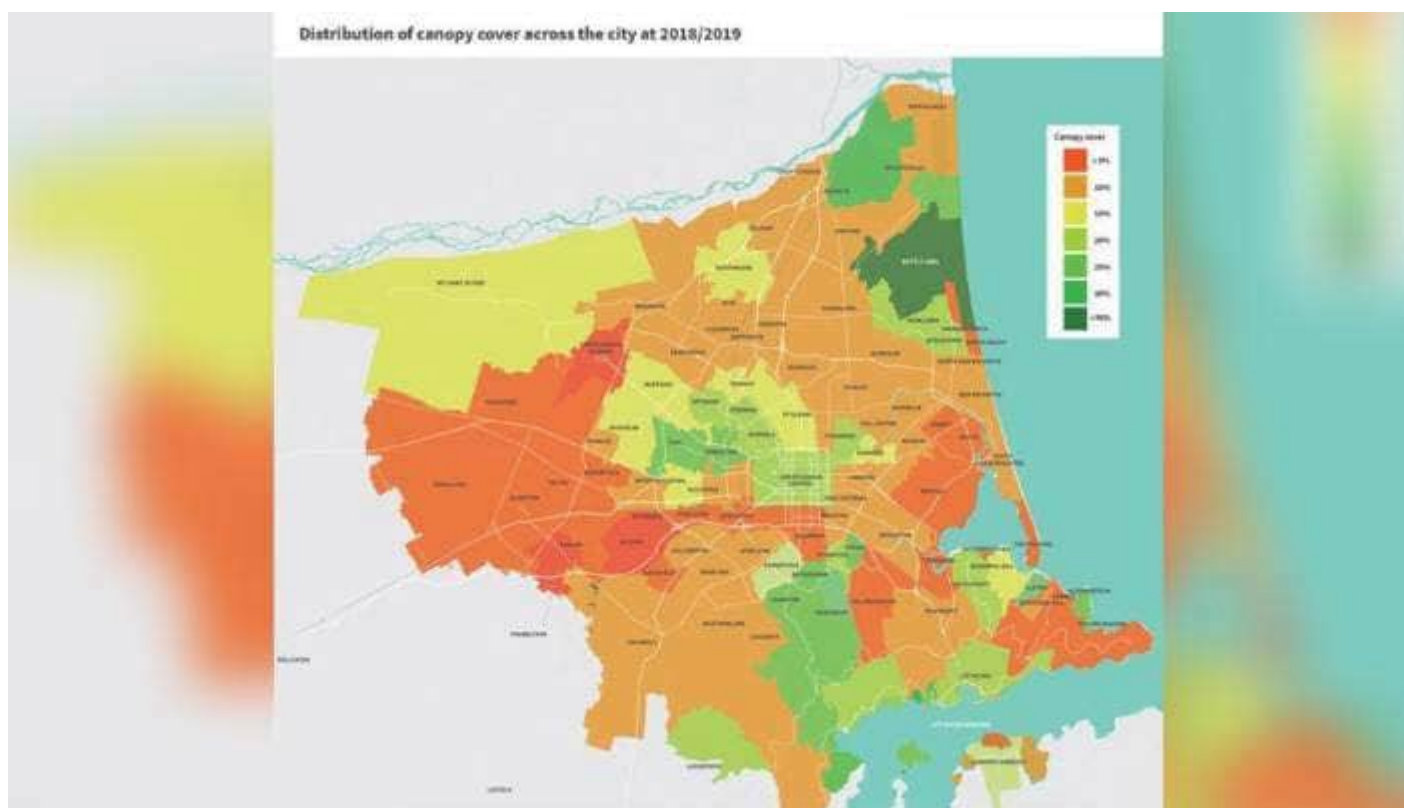
Next time you're in a reserve walking the dog or the kids, look for places where trees could be planted. There's no need to sow the cricket ground, but around the edges. Or where there are random patches of grass serving no purpose other than being green and employing mower drivers.

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Now imagine that as a small forest plot, maybe with walking paths meandering through.

They also want to double the street tree canopy, from the current 8% to 15% by 2070. Trees along the banks of the city's waterways will increase from the current 21% to 70% by 2070, under the plan.



#### *CCC/Supplied*

Canopy tree cover across Christchurch in 2018-19. The greener the better. Orange indicates about 10% canopy and red indicates 5% or less,

The plan also addresses “equitable tree coverage”. Basically, rich "leafy suburbs" aren't a myth. Canopy cover in Cashmere is 21%, Fendalton 19% and Innes 19%. The bottom three are Halswell (9%), Linwood (9%), and Hornby (6.5%).

They are missing out on the many benefits of a tree canopy – more shade, lower temperatures, fewer pollutants, more biodiversity, less erosion, more climate change resilience, and better physical and mental health.

The council wants no ward to have less than 15% canopy cover by 2070.

To achieve this, the council will even consider buying land suitable for forests.

Needless to say, this isn't funded. Given the large amount of publicly-owned grass around the city not used for sport and capable of hosting a tree, the need to buy more land seems decades off.

Indeed, of the 44 “actions” in the plan, 12 are currently funded and 32 are not. The funded dozen include the council's current policy of replacing any tree felled on public land with two new ones, and maintaining a register of “significant” trees.

One important action not funded is ensuring the canopy targets are “considered in all council projects and planning documents”. Implementation is supposed to start this year and run until at least 2032.

Another unfunded idea is investigating how to incentivise private landowners to keep and plant more trees.

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*ALDEN WILLIAMS/Stuff*

The plan proposes increasing the proportion of tree-lined streets from 8% to 15%. Pictured is Eveleyn Cousins Ave, Richmond.

There is one proposal on the council’s table worth mentioning: [Plan Change 14](#). This arose from central government legislation to increase housing density. PC14 would have allowed up to three homes, up to 12m high, to be built on most residential sections without resource consent.

Last September, Christchurch councillors voted against notifying PC14 – the “[proverbial finger](#)” to [Wellington](#).

Buried in PC14 was a plan to force property developers to keep or plant trees on their projects or [pay a levy](#) for council to plant those trees elsewhere.

[More from Will Harvie • Senior reporter](#)

[will.harvie@stuff.co.nz](mailto:will.harvie@stuff.co.nz)

And that's the central conundrum of the Urban Forest Plan. If passed by council, it runs square into intensification – at least in the early years.

With Christchurch's population expected to increase 21% to 480,000 by 2050, we have to find room for all these new people, and now, monumental numbers of trees.

The Urban Forest Plan is open for submissions until March 6. Comment at [HaveYourSay](#).

# Success story: the transformation of Singapore into a sustainable garden city

Wednesday, January 13, 2021

My list

Share

Author | Tania Alonso Singapore is a series of **parks and green spaces**. Vegetation starts out on the ground and reaches [the very top of buildings](#), it grows on terraces and also inside houses and offices. But this has not always been the case. Just under 50 years ago, this city-state, which was then an emerging country, **began a race** to become one of the cleanest and greenest cities in the world. It is a success story recognised the world over.

## A change of strategy





“A two-stage plan, which will transform Singapore into ‘a beautiful garden city with flowers and trees, without waste and as neat and orderly as possible’ was announced today by the prime minister Lee Kuan Yew”, *The Straits Times* [communicated](#) on 12 May 1967. This plan **marked the start of the transformation of this small Asian city-state**, which was a dirty and highly polluted city, into a green and sustainable model.

The first stage consisted of removing rubbish from the streets (“often the result of lack of public awareness and apathy”, in the words of the prime minister). The second, **educating people**. At the time, [this newspaper indicated](#), it was normal to throw rubbish out of windows or into public drainage systems, or to see street vendors and motorists simply throw rubbish out of vehicles.

In order to implement these measures, **new laws had to be created**, such as the one establishing that each household and business had to have a rubbish bin (more than half the households in the city did not own one) or the law that increased taxes for those that generated more waste. On 12 May 1967, ‘The Strait Times’ already indicated why this transformation was necessary. Firstly, it would improve public health by **reducing the number of mosquitos, flies and diseases**.

“There is no choice but to have an efficient cleaning service, given the tropical climate of Singapore, which encourages waste decomposition and the high density of its population”, [this same newspaper indicated](#) 12 years later. The government’s second reason was **to attract tourism to a cleaner city**, which would increase employment rates and the interest of foreign investors in Singapore.

## **The start of a garden-city**



The projects to clean the streets, **the drainage system and the Singapore river**, which gradually changed and were adapted in subsequent decades, were completed together with others to increase green spaces. The ‘Singapore, garden-city’ project (which was later renamed ‘Singapore, a city in a garden’) was based on an initial premise: to improve the quality of life of inhabitants **introducing [vegetation into public spaces](#)**. At the end of 1970, **[more than 55,000 new trees](#)** had been planted and, by 1971, a tree planting day was inaugurated, an annual event that involved huge numbers of people.

The transformation was also reflected in laws such as the *Parks and Trees Act*, enacted in 1975. This required government and private agencies to **reserve spaces for trees and vegetation** in their projects and buildings. The list did not end here: the number of parks and natural spaces increased, campaigns such as the '*Clean and green week*' were introduced and citizens' environmental and ecological education was improved. As a result, the city has seen **its green areas continue to grow**. A large network of tree-covered and pedestrian corridors connecting parks with one another and the number of new trees increased from approximately 158,600 in 1974 to 1.4 million in June 2014.

## **Eco-friendly building and vertical gardens**



As these green spaces grew, so did the population of [Singapore](#). This posed a challenge, since the city-state has a **high population density**: today, Singapore has a population of over five million in less than 700 square kilometres. The solution to continue creating green spaces despite the increased population was to combine architecture and vegetation. [Green building has been mandatory](#) since 2008 in Singapore. It is normal to find plants on the top and the sides of buildings (like cascading gardens) and also inside the buildings. Behind measures

such as these, is Cheong Koon Hean, who was the first woman to head Singapore's urban development agency.

One of the finest examples of the union between architecture and nature on the island is the [Jewel Changi airport](#). The last extension, designed by the architect Moshe Safdie, combines natural light, water and green spaces. Another good example are the *supertrees*, 50-metre tall artificial trees located in the famous *Gardens at the Bay*. These structures offer a light show (powered by solar energy) and also have **more than 150,000 real plants** embedded on its sides.

## Change of perspective

“In many countries, short-term approaches have prioritised economic development over the environment. A change of mentality was needed”, [according to Masagos Zulkifli](#), Minister for the Environment and Water Resources of Singapore. “Our approach has been to build a habitable and sustainable city through a pragmatic policy, based on solid economic and scientific principles, a **long-term planning** approach and the effective implementation and capacity to gain the support of the people for the public interest.

Many of his measures, such as the integration of sustainable infrastructures and increasing [green spaces in the city](#), may help to achieve various UN Sustainable Development Goals. For example, **reducing cities' negative environmental impact per capita**: the presence of trees and green areas contributes to the reduction of carbon dioxide emissions into the atmosphere and the effects of the [urban heat island](#).

One of Singapore's main strengths in following this line of action in the future is the environmental awareness of its citizens. For [Lim Liang Jim](#), director of the National Parks Board's National Biodiversity Centre, **educating young people** is essential in order to maintain the achievements reached in the city-state: “If in the future someone says ‘let's not think about green, let's build’, a significant portion of the population will act as **informed advocates for nature's conservation and green spaces**”. Images | [Yeo Khee](#), [Lita Ruza](#), [Kenneth Koh](#), [Victor](#)

## Tags

# Urban Tree Cover

*Tree Cover and Green Space provide a number of environmental benefits to urban residents, including shade and evaporative cooling, as well as providing habitat for biodiversity.*

## Chapter Authors

- [What It Measures](#)
- [Why We Include It](#)
- [Where the Data Comes From](#)
- [What are the Targets?](#)

The Urban Tree Cover indicator measures the presence of tree cover within a city. This indicator also acts as a proxy for a city's green space — the physical presence of vegetation — within city neighborhoods. The Urban Tree Cover/Green Space issue category includes two indicators: Tree Canopy Cover Loss and Tree Cover Per Capita.

The Tree Canopy Cover Loss indicator describes the total area (in square kilometers) of urban tree loss from 2001 to 2016, benchmarked against the tree cover baseline extent in 2000. As defined by Hansen et al. (2013)<sup>1</sup>, *tree cover loss* is a stand-replacement disturbance, or a change from a forest to non-forest state, such as the removal or death of trees, regardless of the cause and inclusive of all types of tree cover.

The second indicator, Tree Cover Per Capita, assesses a population's access to its urban forest, measuring the tree cover extent per person living in the defined area of analysis. A variation of this indicator, Tree Cover per Capita Deficit, is also calculated, and defined as the additional square meters of tree cover needed to reach the UN-Habitat's suggested 15 square meters (m<sup>2</sup>) of tree cover per capita.

## Description

### History of identifying and monitoring urban green space

Green spaces and parks have been a feature of cities since ancient times. Beginning in the late 19th century, many urban planning schools and approaches sought to capture their role and relevance for cities. The Garden City Movement<sup>23</sup>, founded in 1898 by Ebenezer Howard in the United Kingdom, proposed the development of limited-size cities, with proportionate areas for housing, industry, and agriculture, surrounded by rural green belts. The City Beautiful Movement, developed in the US since 1893, promotes the beautification of cities using, among other features, parks and green spaces<sup>24</sup>. The New Urbanism movement gained prominence in the 1990s. Its main components include the strong need for public space, of which public green space is a key element<sup>25</sup>. The Sustainable Communities Movement has also grown since its founding in the mid-1990's – it aims to bring the concept of sustainability to the urban context, and highlights the use of green spaces to address many urban challenges<sup>26</sup>.

All of these movements, with their respective approaches and limitations, aim to improve citizens' quality of life, often in response to poor conditions in urban centers, and include

green space as an important tool to achieve this goal. Most recently, the adoption of the Sustainable Development Goals (SDGs), particularly SDG 11, and the New Urban Agenda (NUA) — which includes the explicit objective of achieving equitable access to green spaces for all citizens — demonstrate the increasing recognition of urban green spaces' importance in making urban centers more sustainable.



Given the benefits it provides, the identification and monitoring of urban vegetation has been explored through different techniques, primarily through remote sensing imagery or survey-based data<sup>27</sup>. Remote-sensed imagery has been used extensively in studies that aim to relate land use patterns with other spatial features, such as land temperature or air pollution. Survey-derived data, such as administrative inventories of green spaces, have been used in studies exploring issues around access to green spaces and the equitable distribution of green spaces in a city. Recently, new approaches have leveraged additional datasets to measure green space. The Treepedia project<sup>28</sup>, for instance, uses street-photographs to measure the greenness of a city (see Box 2 for additional details about the Treepedia project). Box 1, *Complementary measures of greenness in urban spaces*, highlights the relationship between satellite-derived measures of urban tree canopy and additional sources of information, such as administrative data about parks and street trees within a city.

### **Box 1. The complementary measures of greenness in urban spaces.**

The most common approaches to analyzing of urban vegetation involve either remote sensing imagery, data derived from field surveys, or a combination of both. While these approaches aim to measure a city's greenness, due to limitations in their nature and methods, none can completely measure all its elements, and the results of different indicators for the same city could be significantly different.

To explore these differences, the following graphs compare three different indicators that measure the green space for the city of Sao Paulo using different approaches. The first



indicator, TREECAP, represents the total amount of Tree Cover per person, measured from the Global Forest Change Dataset (Hansen et. al. 2013), and is an example of a satellite-derived indicator. The other two indicators examine the green space of a city using primarily survey-based data. The PARKCAP indicator represents the total amount of official park area per person, measured using the city of Sao Paulo's official public park repository. The STREECAP indicator measures the number of street trees per person, according to the city's street database.

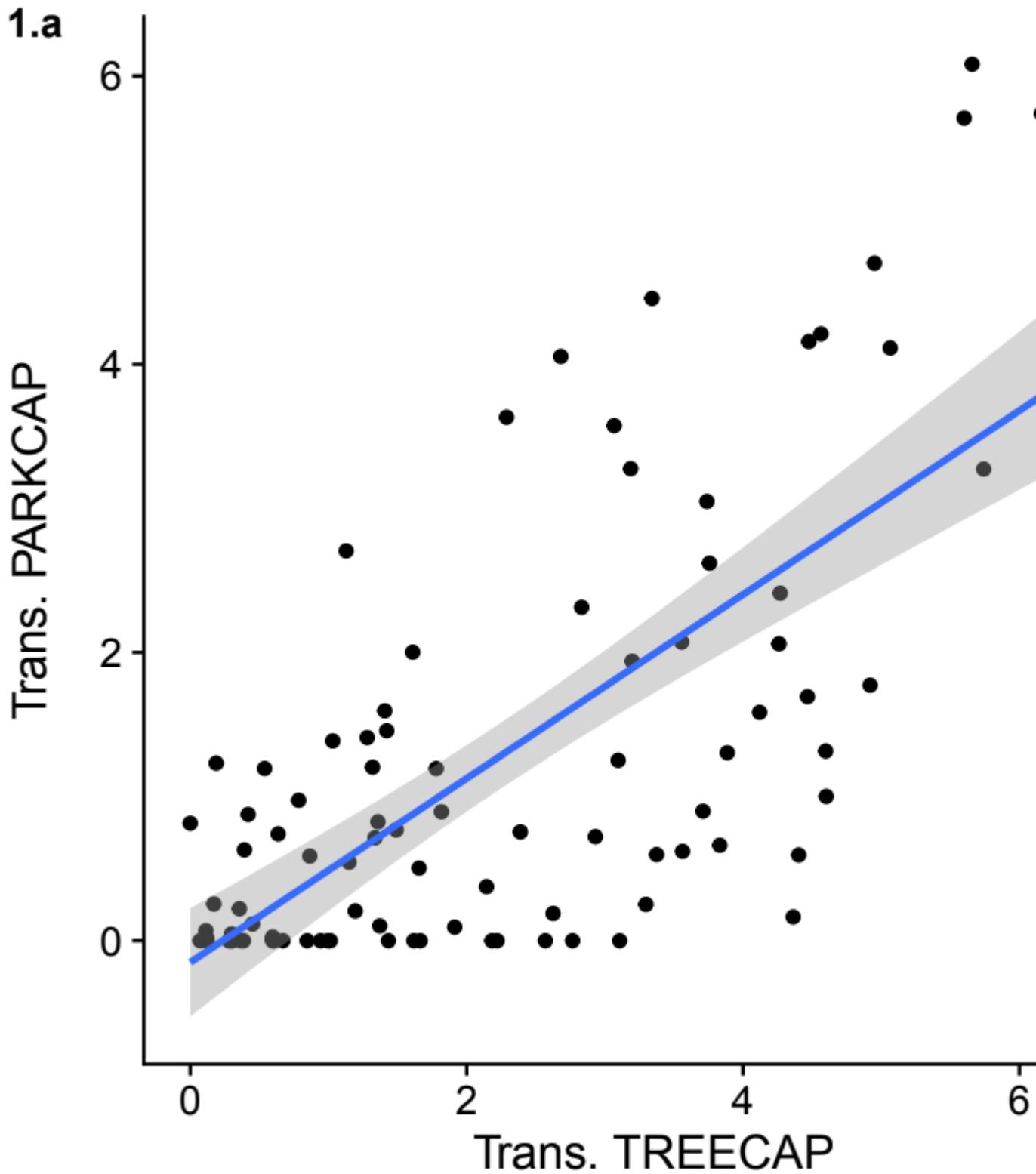


Figure 1. Graphical association of indicators of Green Space for the city of Sao Paulo

A visualization of the relationship between these three indicators illustrates their complementary nature. Figure 1 shows scatterplots of the three transformed indicators, compared in a pairwise form, including a trend line of their relationships. Figure 1.a shows that the TREECAP and PARKCAP indicators are positively associated. In other words, the

provision of tree canopy cover per person is positively associated with the provision of urban parks in the city of Sao Paulo. While this might seem like a very logical relation, its important to consider that the presence of Tree Cover is not exclusive to urban parks, and in fact some urban parks, like plazas or monumental spaces, might not provide tree cover at all.

Another potential source of difference between the TREECAP and PARKCAP indicators is related to the specific elements that they are able to measure. For instance, while the tree cover indicator provides a broad indication of the presence of areas with accumulated tree canopy in cities, it cannot distinguish between the public and private spaces where this vegetation is located, a key aspect when access and equity is considered. Figure 2 exemplifies this issue, illustrating that much of the city's tree cover occurs outside official parks, in what could be private areas, or vegetated undeveloped land.

In other cases, indicators are less closely aligned. In Figure 1.b, which compares the TREECAP and the STREECAP indicators, the association between the two is almost non-existent, suggesting that the indicators measure very different aspects of the urban vegetation, due to the nature of their methods. Whereas TREECAP is able to identify and measure areas of tree cover as small as 90m<sup>2</sup>, STREECAP is able to measure individual trees and linear green spaces at a much more granular level. This difference highlights the need to fully understand the nature of the indicators that are being used and which component of a city's greenness is being measured.

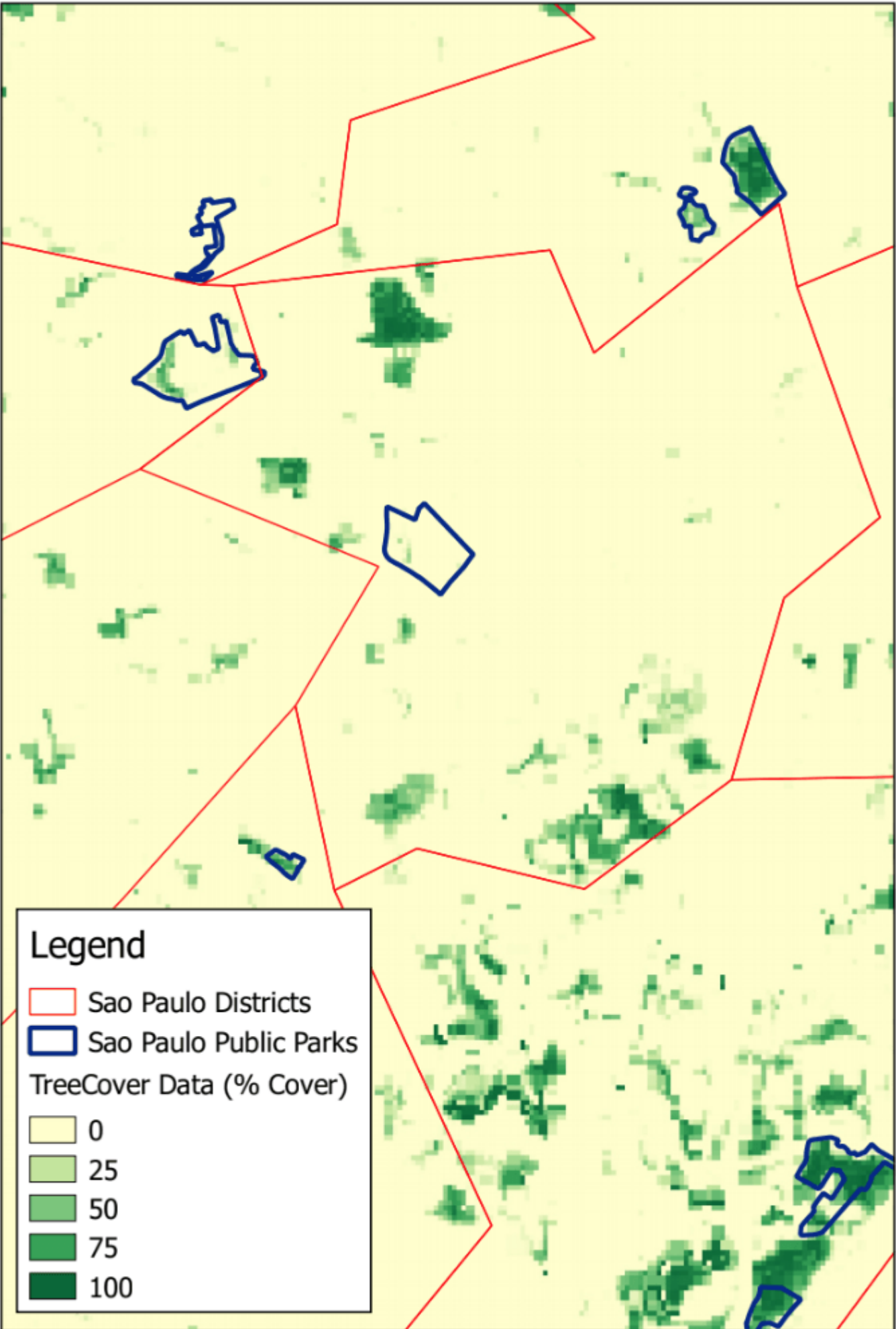


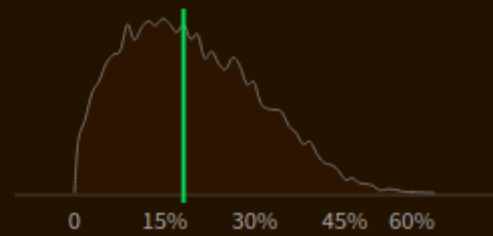
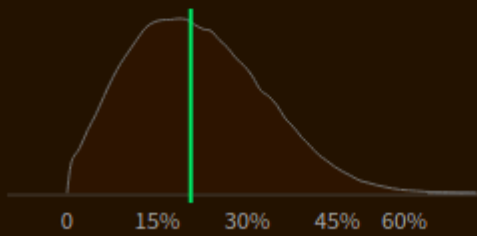
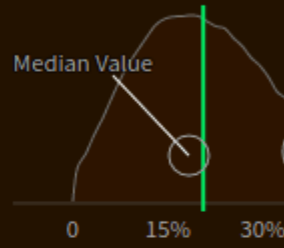
Figure 2. Map of tree cover as it relates to public parks in Sao Paulo.

In summary, even though the UESI uses a remote sensing approach to measure green spaces, a more comprehensive analysis of urban vegetation should involve the use of multiple complementary measures. The use of large-scale remote sensing datasets should be complemented with administrative records of the managed parks and vegetation, in order to provide complete information about the state of a city's vegetation. Unfortunately, this integration faces several barriers, especially in developing countries, where access to remote sensing imagery and the construction of local repositories both entail additional costs and human capacity. Attention to new methods and databases that can generate these indicators – such as the Global Forest Change Dataset<sup>29</sup>, or the Treepedia project from MIT-Senseable Lab (see Box 2 for more details on this project) – could help overcome some of the existing barriers for obtaining quality and policy relevant data.

## **Box 2. Treepedia Case Study**

A recent project from the MIT Senseable Lab fills an important data gap about green space in urban environments. Its Treepedia Project uses a multi-step computer vision algorithm to quantify the percent of tree cover along city streets. The algorithm leverages streetscape images from Google Street View to quantify and create a measure of a city's greenness, in their Green View Index<sup>30</sup>. The project creates a source of data that academics, practitioners and decision-makers can use to evaluate the state of the urban vegetation from a citizen's perspective. In fact, the Treepedia project has purposefully centered on streetscapes, and not on large parks, in the hopes of raising awareness about a less explored but very relevant component of green space in cities.

# Compare Differences



## Amsterdam

Green View Index ● 20.6%

Population Density 4,908/km<sup>2</sup>

## Boston

Green View Index ● 18.2%

Population Density 5,344/km<sup>2</sup>

Figure 3. Results of Treepedia's Green View Index for the cities of New York, Paris, London and Los Angeles. Available at: <http://senseable.mit.edu/treepedia>.

The Green View Index has been calculated for 27 cities, including many UESI cities, such as Amsterdam, Johannesburg, London, Los Angeles, New York, Paris, Sao Paulo, Singapore, and Vancouver, as shown in Figure 3. Unfortunately, a straightforward comparison of the Green View Index and the UESI green space indicators would not be accurate, due to the need to reconcile the boundaries of analysis and the different levels of data aggregation – currently the Treepedia project only has information at a city-level. Future iterations of the Green View Index might allow for a more disaggregated calculation that would then enable neighborhood-level comparisons, and a deeper understanding on the state and types of vegetation within urban landscapes.

Like all measures of urban greenness, the Green View Index should be interpreted with some caveats in mind. In addition to some limitations associated with the method itself, two considerations are particularly relevant. The first is that the Index is limited strictly to streetscapes and available only for cities that have consistent street-level imagery captured by Google Street View, which could limit its use for some cities in developing countries. Additionally, like most remote sensing approaches, the Index is not able to distinguish between the private and public provision of greenness within a city. In other words, the Index does not shed light on how equitable or accessible green space is to a city's citizens. However, even with its limitations, the Index provides an important and complementary measure of the greenness of a city, particularly as it highlights the experience that the citizens can have of the urban landscape<sup>31</sup>.

In addition to exploring methods to identify and quantify urban green spaces, researchers have attempted to analyze how different forms of urban green space impact the city environment and urban citizens. Ekkel and Vries suggest that it is quite common for health-related studies to only consider green spaces above a minimum size<sup>32</sup>. Positive associations between green space and residents' well-being have been found in studies that focus on green spaces of at least 500 square meters (m<sup>2</sup>)<sup>33</sup>. However, the role of small and consistent green spaces – such as street trees – cannot be discarded, as other studies have also found positive associations between these streetscapes and health indicators<sup>34</sup>.

Recent papers have also explored the relationship between different types of green spaces and urban heat island (UHI) mitigation. Xi and Ratti (2008) applied innovative techniques using Google street-view images as a way to measure the shade and cooling benefits of urban street trees in Boston<sup>35</sup>. Park et al. found that linear green spaces – lines of vegetation planted in one or two rows – appear to have no significant relationship on UHI reduction, while polygonal green spaces of at least 300 square meters, with 2300 cubic meters of vegetation cover volume, could reduce UHI by 1°C in their study area<sup>36</sup>. Yang et al. also found that the composition and configuration of green spaces affected the distribution of land surface temperature, though this effect varied across different seasons, and with the size and shape of urban green spaces, among other factors<sup>37</sup>.

Other studies analyze the role of different types of vegetation configurations play in providing the benefits of green space. A study by Shashua-Bar et al. suggests that tree shade reduces thermal stress more than grass alone<sup>38</sup>. Considering the water needed to maintain

different types of vegetation – grass has a greater demand for water than trees, for instance – shade trees reduced thermal stress more efficiently than the combination of trees and grass, or grass alone. Similarly, a study of green spaces on roofs (or green roofs) by Yang et al. found that trees remove more air pollutants than short grass or tall herbaceous plants<sup>39</sup>.

The UESI draws its Tree Cover indicators from the Global Forest Change 2001–2016 (Hansen et. al. 2013) dataset<sup>40</sup>. While originally developed as a tool for large landscape observation, this dataset provides a meaningful and refined analysis of green spaces. It measures the presence of trees at least 5 meters tall, in line with some studies that suggest that trees provide additional benefits than other forms of vegetation, such as grass or shrubbery. Other studies (Wang, 1998; Iverson and Cook, 2000)<sup>41,42</sup> have also utilized large-scale data — in these examples, Landsat data — to measure urban tree cover. The specific indicators calculated for this issue area aim to represent both the evolution in the presence of tree cover in a city over the last 15 years (Tree Canopy Cover Loss), as well as the physical existence of these green spaces in relation to the population living in specific neighborhoods (Tree Cover Per Capita). The Tree Cover Deficit indicator, defined as the amount of tree cover required to reach the minimum target of 15 square meters of tree cover per capita, is used to assess equitable access to tree cover by income group in each city.

## Results

The results of the green space indicators suggest that there is an uneven distribution of tree cover throughout the analyzed districts of the 162 UESI cities, with most districts falling into the lower end of the range. An analysis of the Tree Canopy Cover Loss indicator across all the districts reveals a mean district Tree Canopy Cover Loss of 4.2 percent, and a median loss of 0.44 percent. This indicates a heavily skewed distribution, where most districts have a very small proportion of Tree Cover Loss, while a handful of other districts have very high values of Tree Cover Loss. Only 0.05 percent of the districts had lost 100 percent of their tree cover, while around 32 percent of the districts had not experienced any tree cover loss. This distribution can be also seen when the data is aggregated at the city level. Four cities from the UESI had the highest average Tree Canopy Cover Loss of all evaluated cities, at more than 20 percent: Vientiane (28.63 percent), Coimbra (25.8 percent), Fortaleza (25.8 percent), and Bangalore (21.4 percent). The other UESI cities lost less than 20 percent of their tree cover over the last decade, with 52 cities losing less than 1 percent of their tree cover.

The Tree Cover per capita indicator has a very similar distribution, with a mean value of 1,364.8 m<sup>2</sup> and a median value of 48.52 m<sup>2</sup>. In fact, about 54.48 percent of all districts within the 162 UESI cities have amounts of tree cover per capita greater than the 15 m<sup>2</sup> per capita target, though many cities have at least one neighborhood that has 0 m<sup>2</sup> of Tree Cover per person. An analysis at the city level provides a complementary perspective: only 34 cities have an average tree cover per capita values below the defined target, with 3 cities – Reykjavík, Nouakchott and Kabul- virtually having no measurable tree cover, followed by Lima as the city with the lowest average tree cover area per capita, 0.12 m<sup>2</sup>. Fifty-two other UESI cities have tree cover area values below 1m<sup>2</sup> per person.

Another way to look at the Tree Cover per capita indicator is through its inverse, Tree Cover Deficit, the average amount of tree cover that citizens in each neighborhood are lacking to reach the 15 m<sup>2</sup> per capita target. This analysis provides interesting insights and a different perspective on the distribution of tree cover for the UESI cities mentioned before. The tree cover deficit calculated at the city level shows that most cities have a total amount of tree



cover that could provide at least 15 m<sup>2</sup> of green space to all its citizens, with only 34 cities having a tree cover deficit. However, if we considered the deficit within each district, only 27 cities have districts that all contain sufficient tree cover to provide 15 m<sup>2</sup> to their residents. This difference in results shows the importance of conducting spatial-explicit analyses in order to highlight unequal neighborhood-level distributions within cities that score well on average.

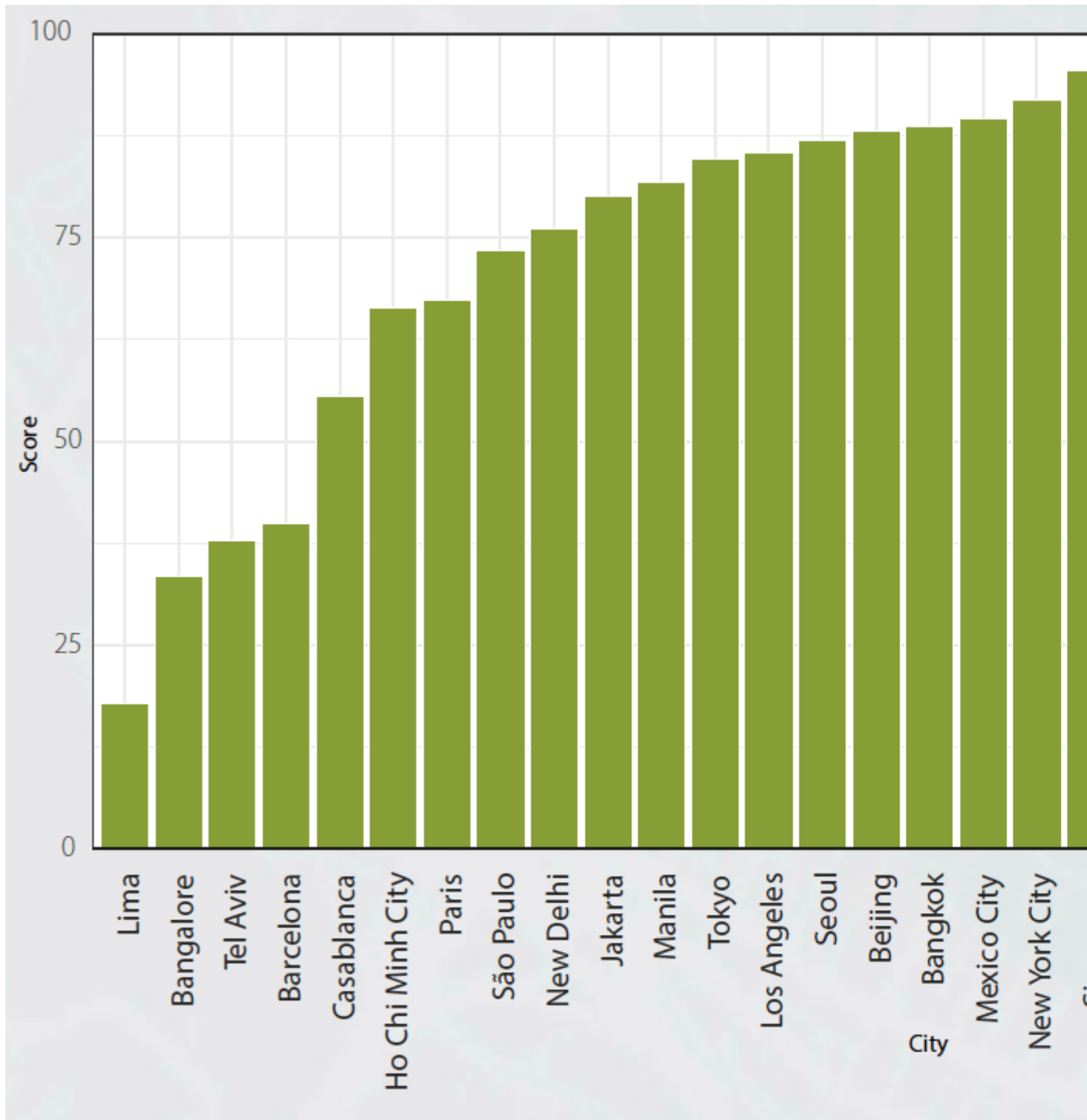


Figure 4. Proximity to Target Scores for Tree Cover per Capita for UESI pilot cities. Higher performing cities are those that are closer or at 100, while lower performing cities are closer to 0.

As with any indicator and dataset, there are some caveats and limitations to be considered. The first and probably most relevant limitation is associated with the 30 x 30 meters per pixel (or 900 m<sup>2</sup>) spatial resolution of the dataset. This resolution may limit the detection of small green spaces or areas with trees below 5 meters of height, which could be providing some meaningful benefit to citizens. Finer-resolution data are now becoming available and could enable more detailed analyses; for instance, the US Department of Agriculture's urban forest dataset covers 17 cities across the U.S. at a 3-meter spatial resolution. Similarly, this indicator will not include most streetscape components, such as street trees and linear gardens; while these elements might have a more limited provision of benefits than trees, their impact should not be fully discarded. Box 3 describes how Singapore, for instance, has leveraged linear gardens to add more green space to the city.

### **Box 3. Highrise Greenery in Singapore.**

Singapore has lost 95 percent of its primary forest since 1819, when the British first established a colonial outpost here. In recent years, Singapore has also experienced severe secondary forest losses. As a city-state with fast economic development and population growth, land use changes and deforestation are almost inevitable. In 1967, shortly after its independence, the Singapore government launched the "garden city" campaign, a nationwide movement to promote tree-planting and greening. Since then, the government has actively promoted innovative ways to incorporate more greenery into Singapore's rapidly evolving urban landscape.



In 2009, the Urban Redevelopment Authority (URA), Singapore’s national urban planning agency, introduced the Landscaping for Urban Spaces and High-Rises (LUSH) program. Through a series of initiatives and regulations, this program encourages planting of accessible greenery in the high-rise urban environment. Noticeably, LUSH’s Landscape Replacement Policy mandates that developers mitigate construction-related losses of green space by incorporating “Landscape Replacement Areas” into their new buildings. These areas refer to a landscaped space on the first or upper levels of the development with its total area equivalent in size to the development site’s footprint. The LUSH programme was then extended in 2014 to cover more geographical areas and development types under LUSH 2.0.

In November 2017, URA updated the LUSH program with its third iteration, injecting more flexibility to the Landscape Replacement Area regulations. Under LUSH 3.0, vertical greenery, extensive green roofs, and rooftop urban farms qualify as Landscape Replacement Areas. New Green Plot Ratio standards are also established to ensure a sufficient density of greenery in private developments.

#### **Box 4. Environmental Inequity at the Neighborhood Level: The Case of Westhaven, Montreal**

Montreal (Canada) is blessed with a variety of green spaces — from large urban parks, to green alleyways, local public parks, communal gardens, and street trees. These amenities are essential for addressing certain challenges related to urbanization, including the impacts of heat island and flooding, both of which are becoming more prevalent in the city of Montreal<sup>43</sup>. However, as highlighted by the UESI and analyzed in the literature,<sup>44</sup> Conseil Régional de l’Environnement de Montreal. 2007. *Le Verdissement Montréalais Pour Lutter Contre Les Ilots De Chaleur Urbains, Le Rechauffement Climatique Et La Pollution Atmosphérique* green space is not distributed equitably across neighborhoods in the city. Many socio-economically disadvantaged neighborhoods have less access to quality green space in Montreal, suggesting an issue of environmental inequity. However, geospatial maps that compare environmental performance between neighborhoods may overlook inequities in access to green space *within* neighborhoods.

According to the UESI, Notre-Dame-de-Grace (NDG) is one of the greenest neighborhoods in Montreal, particularly in regards to tree coverage. However, field research, discussions with community organizers, as well as in-depth literature review has brought to attention that green space is *not* distributed equitably within NDG. As Steve Charters from NDG Community Council states, there are certain “pockets” of disadvantaged areas within the neighborhood that are underserved with respect to green space<sup>45</sup>. This study examines the case of Westhaven, a low-income and socially isolated community within NDG that has disproportionately less greenery than the rest of the neighborhood.

##### **A Socially and Geographically Isolated Community**

Right at the western tip of NDG lies an isolated wedge of land, tucked in between a highway and train tracks. Originally designed to house returning soldiers and their families after World War 2, Westhaven quickly became home to immigrants and low-income individuals seeking cheap housing<sup>46</sup>. Residents normally stay long enough in their apartment to save money, and then upgrade into a new neighborhood — making it challenging to form and sustain close

relations with neighbors. What was once a tight-knit, family-oriented neighborhood has become increasingly disconnected<sup>47</sup>.



Figure 5. Image of one of the vacant green lots in the Westhaven neighborhood. Photo courtesy of Genevieve Westgate.

## **A Community Facing Multiple Scales of Inequity**

The residents of Westhaven face major challenges in the social, economic and environmental spheres. The share of low-income families is 2.5 percent higher than the average for the Island of Montreal, while the share of unemployed people in Westhaven reaches 16.1 percent, compared to 8.8 percent for the Island<sup>48</sup>. Residents also face challenges relating to inadequate housing, food insecurity and low access to education. Furthermore, the community has disproportionately less green space than the rest of the neighborhood<sup>49</sup>, with one local park on the other side of a train track (which makes it hard to access) and one green vacant lot that is accumulating garbage and hosting criminal behaviors at night (see Figure 5)<sup>50</sup>. The alleys are covered with pavement and absent of vegetation, contributing to a higher level of UHI in the area<sup>51</sup>. The residents have voiced that they do not have a public green space that they feel meets *their* needs, either for social or physical activity. Many adolescents expressed that their desires for a basketball court, while some adults wish for a community garden or a dog park<sup>52</sup>.

## **Green Space, Health and Well-Being**

Why is having green space important for the community? The literature has widely acknowledged the fact that providing attractive green space may encourage people to spend more time outdoors and facilitate physical activity, even if it is only at a light level<sup>53</sup>. Increased physical activity has been shown to improve health outcomes, including obesity and cardiovascular health. Furthermore, access to green spaces may have a positive restorative effect on mental health, providing a buffer against stressful life events, reducing anxiety and improving cognitive function<sup>54</sup>. Green spaces also provide a place where people can gather, interact and form positive relationships with their neighborhoods, improving community cohesion<sup>55</sup>. Given the myriads of challenges that this area is facing, these benefits could be especially beneficial to the residents.

## **NDG Community Council Project: *Planning for a Greener, More Active Community***

Recognizing the potential of green space in addressing issues relating to social isolation and community health and well-being, the NDG Community Council launched the *Planning for a Greener, More Active Community* project. The main objective is to increase green space, improve transit and make the neighborhood more walkable and safe — to improve the overall health of the residents<sup>56</sup>. To achieve their goals in a way that meets the needs of the residents, the council will first and foremost engage with the community, by creating events and going door-to-door to get to know the residents and get their input on the project. Once they have an understanding of the pressing needs of the community, they will relay their observations and analysis to the regional public health office, that, if approved, will give them funding to implement local initiatives. The council explains that the projects will be of a small-scale — such as expanding sidewalks, adding more greenery, creating safe public spaces, and securing the railway crossing — such as to not push these renters out of the neighborhood through the process of “eco-gentrification.” The hope is that by making these micro-changes to the neighborhood, the community will become more active and socially engaged, improving health outcomes and fostering social inclusion and feelings of belonging.

## The Way Forward

In sum, despite the fact that NDG has higher green coverage than the Montreal average, there are “pockets” of underserved areas, like Westhaven. This may not be so evident for policy-makers that analyze maps of neighborhood environmental performance. As such, careful attention must be paid when observing the UESI so as to not overlook variations within neighborhoods. It may be useful to use satellite view on the portal to get a better sense of disparities beneath neighborhood rankings. It is *essential* for policy-makers to understand and visualize these inequities, so they can propose environmental design plans to promote social inclusion and healthy lifestyles, which adequately represents the needs of the population.

Another element that affects the results of the Tree Cover per capita indicator is the population distribution, and the selected boundaries of the analysis. While the analysis aims to analyze the tree cover distribution around urban areas, the physical boundaries and disaggregation have been defined according to the administrative boundaries of the city (see Box 4 for a discussion of intra-neighborhood variation in tree cover). This selection, while necessary in order to combine socioeconomic and environmental datasets, does not distinguish between the strictly urban areas, peri-urban areas, and rural areas located in the periphery or in the middle of the city itself. As a result, some of the districts might incorporate areas with heavy tree cover and very low population density, something that is reflected in some of the very high Tree Cover Per Capita results for some districts, particularly those of significant extent, such as those in Chinese cities.

## Tree Cover and Equity

Using the approach detailed in the *Equity and Social Inclusion Chapter*, we performed an analysis comparing distributional equity of both income and Tree Cover per Capita<sup>57</sup>. The results of this analysis are exemplified in Figures 5 and 6 for a select number of UESI cities.

Figure 6 provides a graphical representation of Tree Cover per Capita for select UESI cities, based on the construction of Environmental Concentration and Income Lorenz curves. The position of the curves relative to a 45 degree line, which represent a scenario of perfect equity, provides information about the segments of the population in which the environmental outcome – Tree Cover per Capita – is unequally allocated. For example, the position of the Concentration curve below the 45 degree line for cities such as Johannesburg and Singapore, indicates that there is more tree cover per capita allocated to those with more income. To the contrary, the position of the curve above the 45 degree line in cities like Sao Paulo, indicates that there is more tree cover per capita available for with lower income.

For many cities, the concentration curve crosses the 45 degree line of perfect equity. This case suggests that within a city, sectors of the population with different levels of income might experience different relationships with Tree Cover per Capita allocation. For example, in Copenhagen, the Tree Cover per Capita concentration curve presents two pockets of inequity, one located below the equity line, affecting the poorest citizens, and one above below the equity line, benefiting a segment of wealthier citizens. These changes in the relationship between and environmental burden and different sectors of the population can help identify especially vulnerable sectors of the population and help policymakers respond to their particular situations.



A numeric quantification of the inequality in distributions of Tree Cover Deficit and Income, derived from the curves in Figure 6, is summarized in Figure 7. The quadrant plot presents the UESI's proposed typology that categorizes the relation between the environmental inequality and income inequality, using the Environmental Concentration Index (ECI) and the Gini Coefficients respectively (see the *Equity and Social Inclusion Profile* for a more detailed description of this plot). The results indicate cities are spread through different levels of income inequality, as indicated by the Gini coefficient, and that environmental inequality is also prevalent across most UESI cities.

## Tree Cover Per Capita Distribution

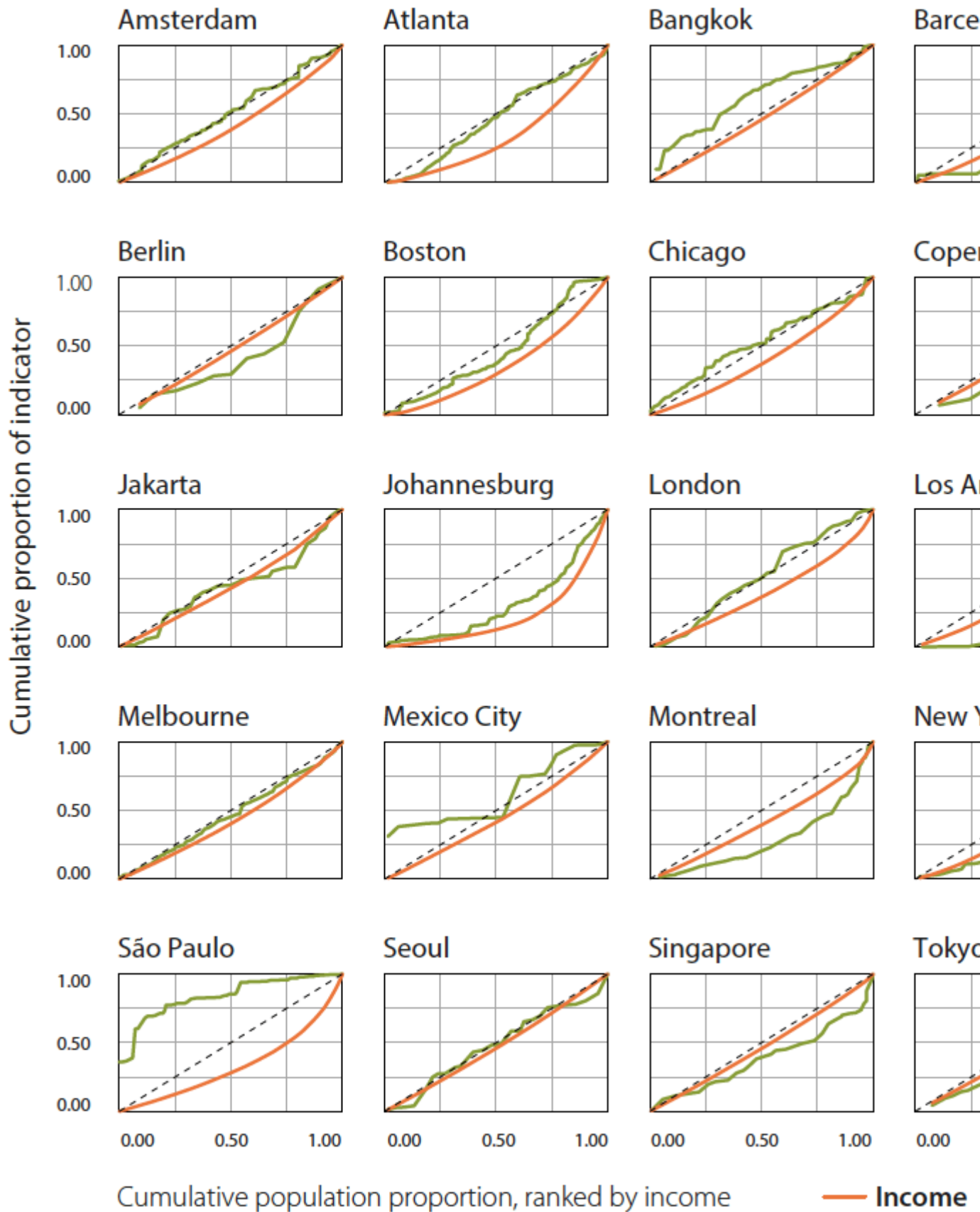


Figure 6: Environmental and income distribution curves for selected UESI cities. These plots show the distributions of Tree Cover per Capita (e.g., the concentration curve in blue) and income (e.g., the Lorenz curve in red) throughout city neighborhoods. Deviations from the dotted line (e.g., the line of perfect equity) illustrate cities that are less equitable in their distribution of Tree Cover per Capita. Concentration curves above the line of equity indicate the environmental burden is more heavily allocated to those with less income; concentration curves below the line of equity indicate that the environmental burden is more heavily allocated to those with greater income. (See the [Equity and Social Inclusion Profile](#) for a more detailed description of this plot and the [Cities Page](#) for a full exploration all cities' environmental and income distribution curves)

The top left quadrant (Low Gini and positive ECI) includes cities such as Albuquerque, Los Angeles, Brussels, Hamburg, and Seoul, where the Tree Cover per Capita is more heavily allocated to the richest income earners in those cities. While these cities have low income inequality, the environmental pressure falls hardest on low-income populations — who are negated the benefits of access to green space at the same level as other citizens — potentially creating an additional economic pressure on the lowest-earners of the city and increasing the gap between poorer and richer citizens. The top right quadrant (low Gini and negative CI) includes cities such as Malaga, London, and Sao Paulo, where the Tree Cover per Capita is more heavily allocated to the lowest-income earners of city. In these cities, the inequality of the Tree Cover per Capita does not actively aggravate the relatively low income inequality throughout the city, because the poorer citizens don't need to spend economic resources to gain access to tree cover or green spaces.

Cities in the bottom right quadrant, such as Panama City, Istanbul, or Kyiv are those where the tree cover is more heavily allocated to the lowest-income earners of the city, thus potentially allowing easier access to this green spaces, but have high levels of income inequality which creates economic pressure. Finally, the cities in the lower left quadrant (high Gini and negative ECI), such as Johannesburg, Lima or Caracas, have both high income inequality and high environmental inequality. In other words, the unequal allocation of tree cover could compound the city's income inequality, exacerbating the situation of the lowest income-earners and increasing the gap between poorer and richer citizens.

Finally, it is worth mentioning that while the ECI and Gini values are relevant summary indices to evaluate inequality in the distribution of an environmental outcome, there are some limitations to be considered (see the [Equity and Social Inclusion Profile](#) for a more details). The interpretation of the ECI needs to be complemented with an analysis of the Environmental Concentration curves themselves and the data used for their construction. This process will allow the decisionmakers to have a more comprehensive picture of the specifics of their cities, both in terms of the allocation and the intensity of the environmental outcomes, as well as its relation with income to craft potential useful interventions to address these issues.

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## CONTENTS

- [Urban Tree Cover](#)
  - [Description](#)
  - [Results](#)

- [Tree Cover and Equity](#)
- Appendix
  -

# Our proposed Housing and Business Choice Plan Change (14)

## Submitter Details

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

**First name:** Jo **Last name:** Appleyard

**Organisation:** Christchurch International

Airport Limited (CIAL)

**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:

## Attached Documents

File

CIAL submission on PC14



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: Christchurch International Airport Limited (CIAL)

- 1 This is a submission on the proposed Housing and Business Choice Plan Change to the Christchurch District Plan (PC14).
- 2 CIAL could not gain an advantage in trade competition through this submission.
- 3 The specific provisions of PC14 that CIAL's submission relates to and the reasons for CIAL's submission are set out in **Appendix A** and **Appendix B** below.
- 4 CIAL's submission relates to the whole proposal. The general and specific reasons for CIAL's relief sought in **Appendix B** are set out in **Appendix A**.
- 5 CIAL seeks the following decision from the local authority:
  - 5.1 Grant the relief as set out in **Appendix A and B**;
  - 5.2 Grant any other similar or consequential relief that would deal with CIAL's concerns set out in this submission.
- 6 CIAL wishes to be heard in support of the submission.
- 7 If others make a similar submission, CIAL will consider presenting a joint case with them at a hearing.

**Signed** for and on behalf of Christchurch International Airport Limited by its solicitors and authorised agents Chapman Tripp




---

Jo Appleyard  
Partner  
12 May 2023

Address for service of submitter:

Christchurch International Airport Limited  
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## APPENDIX A

### **Overview**

- 1 Christchurch International Airport Limited (*CIAL*) welcomes the opportunity to submit on Christchurch City Council's (*CCC*) proposed Housing and Business Choice Plan Change to the Christchurch District Plan (*District Plan*) (*PC14*).
- 2 Christchurch International Airport (*Christchurch Airport*) is the largest airport in the South Island and the second-largest in the country. In planning terms, it is regionally and nationally significant infrastructure and plays a critical role in the local community and economy.
- 3 Christchurch Airport is located in the Christchurch District. Land use activities in the district affect, and may be affected by, airport operations and in particular noise from aircraft landing and taking off. Avoiding noise-sensitive land uses establishing and/or intensifying in areas which will be subject to noise levels of 50dB Ldn or greater is a key concern for CIAL.
- 4 In summary:
  - 4.1 CIAL supports recognition in PC14 of land exposed to 50dBA Ldn or greater as an "existing qualifying matter" and supports PC14 in so far as it does not allow residential intensification to take place within the 50dBA Ldn Air Noise Contour.
  - 4.2 However, the spatial extent of the 50dBA Ldn Air Noise Contour must be properly defined in PC14 as a clear signal of where noise sensitive development, including intensification, must be avoided.
  - 4.3 A comprehensive review process has been undertaken to remodel and update the 50dBA Ldn Air Noise Contour for Canterbury. As a result of that exercise the spatial extent of the 50dBA Ldn Air Noise Contour is different to that which was notified in PC14. PC14 should define all areas potentially subject to levels of noise of 50dBA Ldn or greater, based on the 2023 remodelled contours, in reliance on the best available technical information and should prevent intensification within that properly defined area.

### **About Christchurch International Airport**

- 5 The activities at Christchurch Airport make a significant contribution to the social and economic wellbeing of the communities and economies of Christchurch, Canterbury, the South Island and New Zealand.
- 6 In 2018, just under 7 million travelling passengers, on a total of 109,307 aircraft movements, and their associated 'meeters and greeters', passed through

Christchurch Airport.<sup>1</sup> Combined activities saw between 25,000 and 30,000 people visiting Christchurch Airport every day. This is the most recent representative data (pre-COVID-19) but all projections indicate that passenger and visitor numbers will return and thrive.

- 7 Christchurch Airport is home to several international Antarctic science programmes and their associated facilities. Christchurch Airport is also the primary air freight hub for the South Island, playing a strategic role in New Zealand's international trade as well as the movement of goods domestically. On that basis, Christchurch Airport is a significant physical and economic resource in national, regional and local terms.
- 8 CIAL's core business is to be an efficient airport operator, providing appropriate facilities for airport users, for the benefit of both commercial and non-commercial aviation users and to pursue commercial opportunities from wider complementary products, services and business solutions.
- 9 Christchurch Airport has a competitive point of difference over other airports in New Zealand, Australia and many other parts of the world. It operates without curfew and is unrestricted as to the types of aircraft using it. This provides unique benefits to Christchurch Airport, and in turn the region, as Christchurch Airport can accommodate late arriving overseas flights and the US Antarctic Program, as well as associated fleet maintenance activities. The ability of the Airport to continue to operate 24 hours a day, 365 days of the year without restriction is integral to the future economic and social well-being of people in the three local authority districts in the region, the South Island and nationally.
- 10 The COVID-19 pandemic has significantly impacted the aviation sector, creating unprecedented disruption. Through the Government's International Air Freight Capacity (*IAFC*) scheme, funding has been provided to airlines for dedicated freight flights to ensure New Zealand's high value export products reach international markets. Christchurch Airport has played a critical role in the *IAFC* scheme and in New Zealand's ability to respond to and recover from the economic impacts of COVID-19, enabling freight services which keep the South Island's economy connected to the rest of the world and providing stability in uncertain economic times.
- 11 The *IAFC* scheme continues to grow as demand requires. Further, the tourism industry expects that New Zealand will be in high demand as a destination through the COVID-19 recovery phase.

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

***National Policy Statement on Urban Development***

- 12 The National Policy Statement on Urban Development (*NPS UD*) directs that local authority decisions on urban development are to be integrated with infrastructure

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<sup>1</sup> Total in 2019 calendar year.

planning decisions,<sup>2</sup> and that planning decisions contribute to well-functioning urban environments.<sup>3</sup>

- 13 A well-functioning urban environment is one in which:
- 13.1 infrastructure – particularly nationally significant infrastructure such as Christchurch Airport – is not adversely affected by incompatible activities; and
  - 13.2 urban growth is planned with infrastructure provisions in mind, recognising that the two run hand-in-hand.
- 14 While NPS UD Policy 3 directs councils to increase density and realise as much development capacity as possible in urban environments, Policy 4 allows district plans applying to tier 1 urban environments to contain modified building height or density requirements to the extent necessary to accommodate a qualifying matter.
- 15 Qualifying matters are defined in the NPS UD and section 77I of the Resource Management Act 1991 (*RMA*) and include:

*any matter for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure.*

- 16 As outlined above, Christchurch Airport is nationally significant infrastructure. The qualifying matter required to ensure its safe or efficient operation is the restriction of density in areas subject to aircraft noise of 50dBA Ldn or greater to density levels currently provided for in the District Plan.

***Canterbury Regional Policy Statement***

- 17 The efficient use and development of Christchurch Airport as a significant physical regional infrastructure resource is provided for in the CRPS, in both Chapter 5 (Land Use and Infrastructure) and Chapter 6 (Recovery and Rebuilding of Greater Christchurch).
- 18 Policy 6.3.5 of the CRPS:
- 18.1 provides for the continued safe, efficient and effective use of regionally significant infrastructure;<sup>4</sup>
  - 18.2 provides for the provision of efficient and effectively functioning infrastructure;<sup>5</sup> and

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<sup>2</sup> Objective 6.

<sup>3</sup> Policy 1.

<sup>4</sup> CRPS. Objective 5.2.1(2g). Definitions: Regionally Significant Infrastructure includes Christchurch International Airport.

<sup>5</sup> CRPS. Policy 6.3.5(3).

- 18.3 seeks to ensure that land use activities<sup>6</sup> and new development<sup>7</sup> are managed including avoiding activities that have the potential to limit the efficient and effective 'provision, operation, maintenance or upgrade of strategic infrastructure and freight hubs'.
- 19 The 'Principal reasons and explanation' for Policy 6.3.5 states: "*Strategic infrastructure represents an important regional and sometimes national asset that should not be compromised by urban growth and intensification... The operation of strategic infrastructure can affect the liveability of residential developments in their vicinity, despite the application of practicable mitigation measures to address effects... It is better to instead select development options where such reverse sensitivity constraints do not exist.*"
- 20 Objective 5.2.1(f) requires that "*development is located so that it functions in a way that ... is compatible with, and will result in the continued safe, efficient and effective use of regionally significant infrastructure*". Policy 6.3.9(5) requires that the location and design of rural residential development shall avoid noise sensitive activities occurring within the 50 dBA Ldn Air Noise Contour.
- 21 Consistent with the objectives and policies outlined above, Map A of the CRPS indicates urban areas in Greater Christchurch suitable for growth. This explicitly excludes land subject to the 50dBA Air Noise Contour.

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

- 22 The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 was introduced to speed up implementation of the NPS UD, whereby Councils were required to incorporate Medium Density Residential Standards (MDRS) into every relevant residential zone, provided that the MDRS may be less enabling of development where a qualifying matter applies.<sup>8</sup>
- 23 As explained above, this includes a matter required to ensure the safe or efficient operation of Christchurch Airport as nationally significant infrastructure.<sup>9</sup>
- 24 Where a qualifying matter is already provided for in an operative district plan, it is defined as an "existing qualifying matter".<sup>10</sup> The land within the 50dBA Ldn Air Noise Contour is recognised in the district wide objectives and policies of the District Plan as an area where new noise sensitive activities should be avoided. This includes policies to avoid potential reverse sensitivity effects on Christchurch Airport from incompatible land use activities.

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<sup>6</sup> CRPS. Policy 6.3.5(5).

<sup>7</sup> CRPS. Policy 6.3.5(4).

<sup>8</sup> Resource Management Act 1991 (RMA), s 80F(1)(a).

<sup>9</sup> Resource Management Act 1991, s 77(1)(e): inserted by Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021, s 9.

<sup>10</sup> Objective 3.3.12 in the Operative Christchurch District Plan provides that new noise sensitive activities within the 50dB Ldn Air Noise Contour and the 50dB Ldn Engine Testing Contour for Christchurch International Airport except in certain limited circumstances.

- 25 Accordingly, as identified by CCC, land subject to noise levels of 50dBA Ldn or greater is subject to an “existing qualifying matter” for the purposes of PC14.

**Existing qualifying matters**

- 26 The RMA provides a specific process for considering existing qualifying matters, such as the “*Airport Noise Influence Area Qualifying Matter*” proposed in PC14 (*Airport QM*).<sup>11</sup> Each of the relevant steps is outlined below.
- 27 It is important that the Airport QM is appropriately represented and provided for in PC14 and accurately shown on the planning maps to ensure residential development and/or intensification is not enabled in areas subject to aircraft noise levels of 50dBA Ldn or greater. This is necessary to safeguard Christchurch Airport operations and to protect the community from adverse amenity effects into the future.

**Section 77K(1)(a) – Identify by location where an existing qualifying matter applies**

- 28 There is a significant body of existing case law and policy that confirms the Airport QM applies to those areas of land which will be subjected to future aircraft noise levels of 50dBA Ldn or greater. While CIAL supports recognition of the Airport QM, based on the most recent technical information the spatial extent as notified in PC14 does not accurately reflect where residents will experience levels of aircraft noise of 50dBA Ldn or greater.
- 29 In short, the Airport QM must be explicitly recognised in PC14 and must apply to all residentially zoned land (current and future) within the operative 50dBA Ldn Air Noise Contour (shown in the CRPS and the District Plan) (*Operative Contour*) and the 2023 remodelled contours (as shown in Appendix A(i)) (*Remodelled Contours*).
- 29.1 As required by the Canterbury Regional Policy Statement (*CRPS*), there has been an ongoing technical process to remodel the Operative Contour with input from CIAL’s experts and Canterbury Regional Council’s (*ECan*) independent peer review panel (*Independent Panel*). The Remodelled Contours are agreed between CIAL’s experts and the Independent Panel and are highly relevant for the PC14 process. They represent the most recent and accurate evidence as to where aircraft noise effects of 50dBA Ldn and greater will be experienced in Christchurch and therefore should be taken into account in deciding where it is appropriate to allow residential development and/or intensification.
- 29.2 There are two versions of the remodelled contours, one using an Annual Average methodology and the other using an Outer Envelope methodology. Both methods are technically valid and the preferred approach for Canterbury has not yet been confirmed.
- 30 Accordingly, the proposed spatial extent of the Airport QM is demonstrated at **Appendix A(i)** and includes the outer extent of:

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<sup>11</sup> RMA s 77K(1).

- (a) Operative Contour; and
- (b) Remodelled Contour (Annual Average); and
- (c) Remodelled Contour (Outer Envelope).

**Remodelling process**

- 31 Policy 6.3.11(3) in the CRPS requires certain processes with respect to remodelling the Air Noise Contours. CIAL engaged a team of independent experts in 2018 and, after being interrupted by COVID-19, provided draft updated contours to Canterbury Regional Council in 2021 for peer review the Independent Panel.
- 32 The review process has been rigorous and robust and CIAL's experts and the Independent Panel agree on the refined technical modelling approach, inputs and assumptions. The Remodelled Contours are now agreed and they represent the most accurate technical information about the geographical areas where 50dBA Ldn is expected to be felt in Canterbury.
- 33 The two modelling approaches tabled include:
- 33.1 a 50dBA Ldn contour which models the annual average noise levels (*Annual Average*); and
  - 33.2 a 50dBA Ldn contour which models an outer envelope of the average busiest three month period on each runway (*Outer Envelope*) – this closely mirrors the way in which the current contours in the CRPS and the operative Plan were modelled.
- 34 The technical inputs and assumptions underlying both the Annual Average and Outer Envelope approaches were agreed between CIAL's experts and the Independent Panel. Both approaches are technically valid and CIAL has included both in the map at **Appendix A(i)** to ensure that the decision makers on PC14 have the full up to date information as to where aircraft noise effects will be experienced in Christchurch City.
- 35 PC14 as notified does include an area to form the geographical extent of the Airport QM. This indicates that CCC agree it is appropriate to limit intensification in areas potentially subject to 50dBA Ldn or above.
- 36 However, there is now a substantial body of up-to-date information prepared by independent experts through the remodelling process that indicates that the areas where people experience levels of noise of 50dBA Ldn or greater is different to that shown in PC14 as notified. CCC must now take into account the more recent Remodelled Contours in deciding where it would be inappropriate to allow residential development to intensify.
- 37 Accordingly, the Airport QM covers the land within the Operative Contour and the two options for the Remodelled Contour (Annual Average and Outer Envelope as shown in **Appendix A(i)**). This is an interim approach which is necessary to avoid potentially inappropriate development prior to the completion of the CRPS review.

The alternative effectively allows the horse to bolt – rendering the application of the Airport QM ineffective and potentially compromising community amenity and Airport operations.

**Section 77K(1)(b) – Specify the alternative density standards**

- 38 Controlling residential density is the key tool used in avoiding reverse sensitivity effects on Christchurch Airport and to address amenity effects for communities living in areas exposed to aircraft noise.
- 39 When the District Plan was reviewed in 2015, the Independent Hearings Panel (*IHP*) was required to interpret the relevant CRPS policies outlined above and determined that, although there is no absolute direction in the CRPS to avoid any further noise sensitive activities in existing residentially zoned land within the Operative Contour, there is still a need to evaluate whether to avoid or restrict such activities so as to give proper effect to Policy 6.3.5 and related CRPS objectives and policies.<sup>12</sup> The IHP recognised the need for an ongoing capacity to assess relevant reverse sensitivity and noise mitigation matters for residential intensification above a certain scale.<sup>13</sup>
- 40 The decision reinforces the position that density (amongst other things) was, and is, a key matter to address.
- 41 Furthermore, CIAL’s acoustic experts have consistently advised that, where there is sufficient land available elsewhere, residential activity should not take place in areas which will be subject to noise levels of 50dBA and above. There is plenty of land available outside the Operative and Remodelled Contours (both the Annual Average and Outer Envelope) in Christchurch which should be preferred for residential development and/or intensification. Recognition of the Airport QM and identification of its spatial extent on the planning maps would clearly signal this to plan users and CCC staff.

**Section 77K(1)(c) – Identify why a qualifying matter applies to the areas identified under (a)**

- 42 The use of “noise boundaries” is prescribed by New Zealand Standard NZS 6805:1992 “Airport Noise Management and Land Use Planning” (*the Standard*) and this concept is implemented across the country.
- 43 The 50dBA Ldn Air Noise Contour is the outer control boundary (*OCB*) used for Greater Christchurch and reflects the point at which land use controls are necessary to manage the establishment of noise sensitive activities in proximity to Christchurch Airport. This is required in order to:
- 43.1 ensure people are protected from establishing sensitive land uses in areas that are exposed to higher levels of aircraft noise which might disturb them or adversely affect their amenity and quality of life; and

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<sup>12</sup> Decision 10 Residential (Part), Independent Hearings Panel, 10 December 2015, at [195].

<sup>13</sup> Ibid, at [235].

- 43.2 protect Christchurch Airport from reverse sensitivity effects, enabling Airport operations to continue to support and benefit Christchurch, Canterbury and the South Island communities.
- 44 The Courts to date have repeatedly confirmed the importance of ensuring that the 50dBA Ldn Air Noise Contour is properly included in the planning framework to support good planning decisions in limiting density and to continue to protect the safe and efficient operations of Christchurch Airport. The case law is based on a substantial body of expert evidence, which explains that the 50dBA Ldn Air Noise Contour remains the point at which density constraints are required to protect Christchurch Airport.
- 45 The fundamental rationale in support of setting the point at which density constraints are required at the 50dBA Ldn Air Noise Contour has not changed since that case law. A proportion of the community will be highly annoyed by being exposed to aircraft noise at levels of 50dBA Ldn and above. In fact, the latest acoustics research indicates that levels of annoyance in communities are increasing.<sup>14</sup>
- 46 As case law has confirmed, the areas subject to levels of 50 dBA Ldn or greater represents an undesirable noise environment within which residents will be subject to adverse amenity effects and where new greenfield development and further intensification should be avoided. Furthermore, the Standard clearly recommends that, first and foremost, new noise sensitive activities should be avoided.<sup>15</sup>
- 47 New residential activity and intensification must be avoided on land potentially subject to noise levels of 50dBA Ldn to protect the amenity of residents, and to minimise reverse sensitivity effects and risks to operations at Christchurch Airport.
- 48 In making decisions on PC14 and the geographical extent of land subject to aircraft noise levels of 50dBA Ldn, CCC needs to take into account the most up to date information available relating to the Remodelled Contours.

***Section 77K(d) – Describe in general terms for a typical site in those areas identified under (a) the level of development that would be prevented by accommodating the qualifying matter, in comparison with the level of development that would have been permitted by the MDRS and policy 3***

- 49 CIAL is cognisant that some development capacity is theoretically prevented by accommodating the Airport QM. However, it is not realistic to assume that every residentially zoned site within the Airport QM area would take up the opportunity to develop in accordance with the MDRS. Furthermore, a significant portion of this land

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<sup>14</sup> As shown by the more recent studies reviewed by Marshall Day Acoustics in 'Community Annoyance Survey Literature Review'.

<sup>15</sup> Section 1.1.4 recommends a minimum level of protection, but explicitly notes that local authorities may adopt stricter controls than the minimum specified; Section 1.4.2.1 recommends that, between the Outer Control Boundary and the Air Noise Boundary there should be no incompatible land uses; and Table 2 recommends that new noise sensitive activities are prohibited within the Air Noise Boundary.



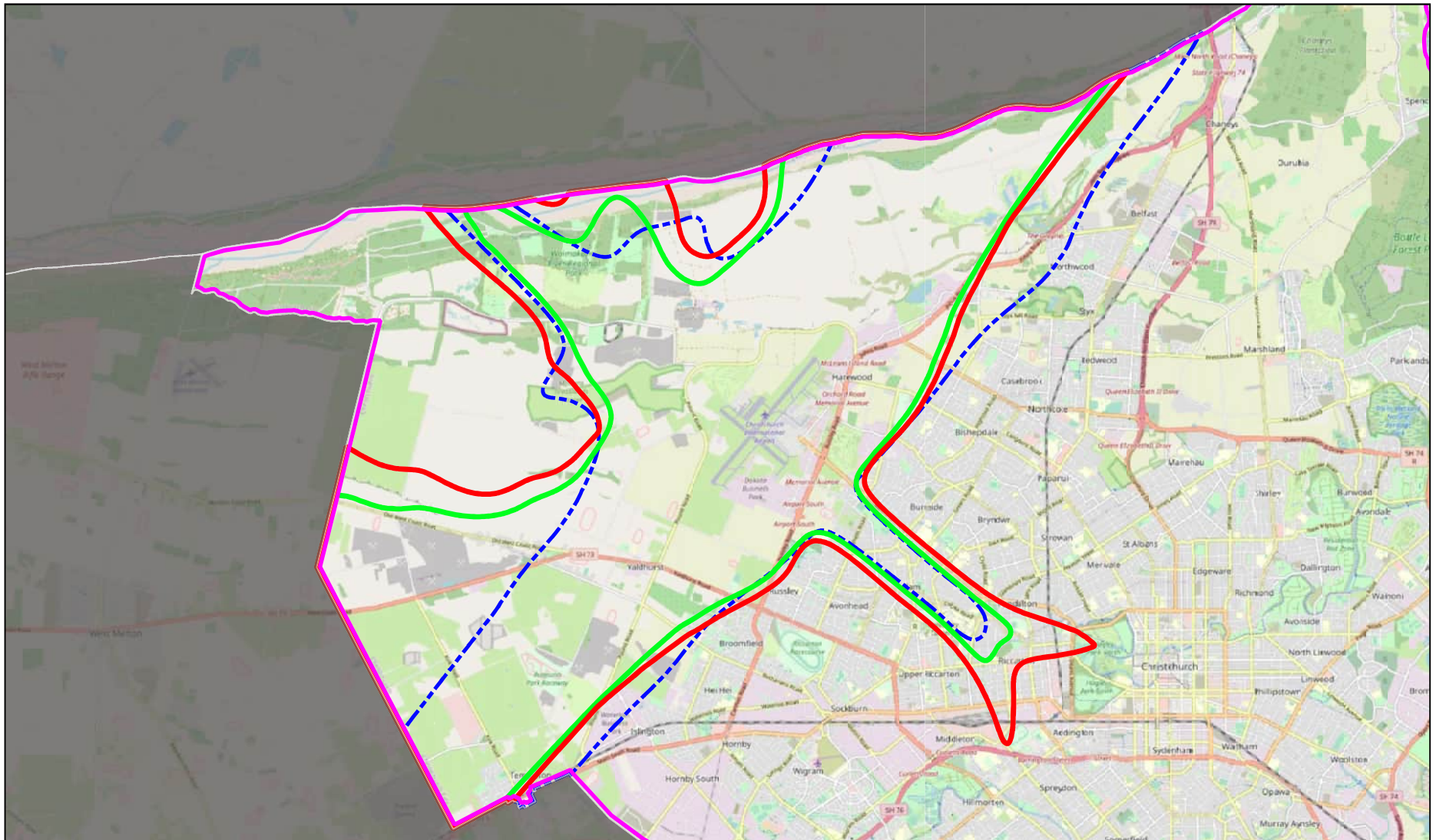
contains additional practical constraints (such as heritage overlays) which limit the ability to take up MDRS regardless.

- 50 On the other hand, less enabling density standards are necessary to protect Christchurch Airport operations and avoid unreasonable amenity outcomes. Allowing intensification to the MDRS within the Airport QM area would expose a greater number of residents to aircraft noise, impacting their health and amenity and ultimately compromising the viability of Christchurch Airport operations.
- 51 There are existing residential areas, and the potential for new residential areas, outside of the Airport QM with development capacity in a more appropriate location. CIAL's acoustic experts have consistently advised that, where there is land available, it is preferable for residential development (and intensification) to take place outside the areas exposed to 50dBA Ldn or greater.
- 52 The RMA specifically provides for qualifying matters and recognises that there will be circumstances where the development potential of MDRS cannot and ought not to be realised to its fullest extent. This is true for the Airport QM area.
- 53 In reality, the level of development prevented by accommodating the Airport QM is minimal when compared to the effects it is designed to address.

**Conclusion**

- 54 CCC has appropriately recognised that areas subject to levels of noise of 50dBA Ldn or greater are subject to an "existing qualifying matter" in accordance with the RMA.
- 55 However, for reasons set out in this submission, the geographical extent of the Airport QM must be included accurately on the Planning Maps as shown at **Appendix A(i)**. Furthermore, CIAL seeks that the relief as set out in **Appendix B** is granted, or alternatively that the Panel grant any other similar or consequential relief that would deal with CIAL's concerns set out in this submission.

## Appendix A(i) Airport Noise Influence Area Qualifying Matter



- ▭ 2023 remodelled 50dBA Ldn Air Noise Contour (outer envelope)
- ▭ 2023 remodelled 50dBA Ldn Air Noise Contour (annual average)
- - - Operative plan 50dBA Ldn contour (as shown on Map A of the CRPS)
- ▭ Christchurch City

Sources:  
 Marshall Day  
<https://gis.ecan.govt.nz/arcgis/rest/services/Public/LURP/MapServer/4>  
 Stats NZ  
 Base map and data from OpenStreetMap and OpenStreetMap Foundation (CC-BY-SA). ©  
<https://www.openstreetmap.org> and contributors.  
 Produced on: 12/05/2023

### APPENDIX B CCC PC14 Submissions and Relief

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

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

Suggested amendments and alternative drafting is shown in track change – CIAL’s requested deletions are shown using ~~red strikethrough~~ and requested insertions shown using red underline.

Sub #	Provision	Position	Relief requested	Explanation
1.	General – Airport Noise Influence Area Qualifying Matter	Support in part	Plan Change 14 (PC14) proposes an Airport Noise Influence Area Qualifying Matter (QM). PC14 proposes to retain the existing operative District Plan (the Plan) zones and provisions beneath the QM. CIAL support this approach but note that a number of amendments are required to correct inaccuracies in rules, update relevant policies and to reflect the remodelled 50dBA Ldn Air Noise Annual Average and Outer Envelope contours. The specific relief sought is detailed in the following submission points.	See detailed submission points below.
2.	<b>Planning Maps</b> – The Spatial Extent of the Qualifying Matter	Support in part	Amend the spatial extent of the QM on the planning maps to show the outer extent of the updated remodelled 50dBA Ldn Air Noise Annual Average and Outer Envelope contours dated May 2023, and the operative contour, as illustrated on the Plan attached as Appendix A(i). Retain the operative District Plan residential zones beneath the contours, rather than apply the MRZ and HRZ.	The PC14 planning maps show the spatial extent of the 50dBA Ldn Air Noise Annual Average contour as it existed in February 2022.  Since that time, the final remodelling has been completed and the May 2023 Annual Average and the Outer Envelope contours are different to those from February 2022.

Sub #	Provision	Position	Relief requested	Explanation			
				<p>Given this, the spatial extent of the QM as shown on the planning maps requires amendment to cover all areas where sensitive activities may be subject to noise levels of 50dBA Ldn or greater. This, together with the retention of the existing relevant Plan rules, will ensure appropriate amenity outcomes for sensitive activities beneath the contour and to ensure the effective and efficient operation of Christchurch Airport.</p>			
3.	<p><b>Chapter 3 Strategic Objectives</b> New Objective 3.3.7 Well-functioning urban environment</p>	Support in part	<p>Amend new objective 3.3.7 – Well-functioning urban environment as follows:</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; including by recognising and providing for;...</p> <p><u>v. reduced density of development for sensitive activities where a Qualifying Matter applies.</u></p>	<p>An amendment to objective 3 is required to recognise, at a strategic level, that the qualifying matters are a key contributor to well-functioning urban environments.</p>			
4.	<p><b>Chapter 6.1A Qualifying Matters</b></p>	Support in part	<p>Amend Table 1 – Qualifying Matters, as follows:</p> <table border="1" data-bbox="758 1057 1276 1333"> <tr> <td data-bbox="758 1057 1276 1089" style="text-align: center;"><b>Chapter 14 Residential</b></td> </tr> <tr> <td data-bbox="758 1089 1276 1195">Safe or efficient operation of nationally significant infrastructure (Christchurch Airport)</td> </tr> <tr> <td data-bbox="758 1195 1276 1333">14.4.1 – 14.4.4, <del>14.9</del>, 14.13, 14.14 <del>Low Density Residential Airport Influence Zone and Airport Influence Density Precinct Airport Noise Influence Area</del></td> </tr> </table>	<b>Chapter 14 Residential</b>	Safe or efficient operation of nationally significant infrastructure (Christchurch Airport)	14.4.1 – 14.4.4, <del>14.9</del> , 14.13, 14.14 <del>Low Density Residential Airport Influence Zone and Airport Influence Density Precinct Airport Noise Influence Area</del>	<p>A correction is required to the description of the QM used in the table to align with the planning map notation and the relevant Restricted Discretionary activity rules of the Plan residential zones. A reference to Chapter 14.9 is required as the Residential Large Lot Zone (Gardiners Road) sits beneath the QM (see specific submission below).</p>
<b>Chapter 14 Residential</b>							
Safe or efficient operation of nationally significant infrastructure (Christchurch Airport)							
14.4.1 – 14.4.4, <del>14.9</del> , 14.13, 14.14 <del>Low Density Residential Airport Influence Zone and Airport Influence Density Precinct Airport Noise Influence Area</del>							

Sub #	Provision	Position	Relief requested	Explanation								
5.	<b>Chapter 6.1A Qualifying Matters</b>	Support in part	<p>Amend Table 1 – Qualifying Matters, as follows:</p> <table border="1" data-bbox="758 318 1272 1349"> <thead> <tr> <th data-bbox="758 318 1272 354"><b>Chapter 15 Commercial</b></th> </tr> </thead> <tbody> <tr> <td data-bbox="758 354 1272 456">Safe or efficient operation of nationally significant infrastructure (Christchurch Airport)</td> </tr> <tr> <td data-bbox="758 456 1272 521">15.2.4.6 Policy – Strategic Infrastructure</td> </tr> <tr> <td data-bbox="758 521 1272 667">15.4.1.1 P21 and 15.4.1.5 NC<del>12</del>– Town Centre Zone - Residential activity within 50 dB Ldn Air Noise Contour <u>or the Airport Noise Influence Area</u></td> </tr> <tr> <td data-bbox="758 667 1272 829">15.5.1.1 P21 and 15.5.1.5 NC2 – Local Centre Zone - Residential activities within 50 dB Ldn Air Noise Contour <u>or the Airport Noise Influence Area</u></td> </tr> <tr> <td data-bbox="758 829 1272 992">15.6.1.1 P19 – Neighbourhood Centre Zone - Residential activities within 50 dB Ldn Air Noise Contour <u>or the Airport Noise Influence Area</u></td> </tr> <tr> <td data-bbox="758 992 1272 1154">15.6.1.5 NC2 - Neighbourhood Centre Zone - Sensitive activities within the 50 dB Ldn Air Noise Contour <u>or the Airport Noise Influence Area</u></td> </tr> <tr> <td data-bbox="758 1154 1272 1349"><u>15.9.1.1 P10 - Commercial Office Zone - Preschool outside of the 50 dB Ldn Air Noise Contour or the Airport Noise Influence Area</u></td> </tr> </tbody> </table>	<b>Chapter 15 Commercial</b>	Safe or efficient operation of nationally significant infrastructure (Christchurch Airport)	15.2.4.6 Policy – Strategic Infrastructure	15.4.1.1 P21 and 15.4.1.5 NC <del>12</del> – Town Centre Zone - Residential activity within 50 dB Ldn Air Noise Contour <u>or the Airport Noise Influence Area</u>	15.5.1.1 P21 and 15.5.1.5 NC2 – Local Centre Zone - Residential activities within 50 dB Ldn Air Noise Contour <u>or the Airport Noise Influence Area</u>	15.6.1.1 P19 – Neighbourhood Centre Zone - Residential activities within 50 dB Ldn Air Noise Contour <u>or the Airport Noise Influence Area</u>	15.6.1.5 NC2 - Neighbourhood Centre Zone - Sensitive activities within the 50 dB Ldn Air Noise Contour <u>or the Airport Noise Influence Area</u>	<u>15.9.1.1 P10 - Commercial Office Zone - Preschool outside of the 50 dB Ldn Air Noise Contour or the Airport Noise Influence Area</u>	<p>Policy 15.2.4.6 (Strategic Infrastructure) has been amended by Plan Change 5B and remains unchanged by PC14. CIAL supports the policy as it establishes a framework for the supporting rules within the relevant commercial zones that sit beneath the QM.</p> <p>A minor amendment is required to rule 15.4.1.5 to refer to the correct non-complying activity rule.</p> <p>The permitted and non-complying activity rules of the relevant commercial zones refer to the “50dB Ldn Air Noise Contour”. An additional reference to the Airport Noise Influence Area Qualifying Matter is also required to give effect to the policy framework and for the reasons outlined above in submission 2.</p> <p>The Commercial Office zone needs to be added to the table as there are two locations (Addington and Russley) where the zones sit beneath the QM.</p> <p>An amendment is required to the Mixed Use Zone (MUZ) to recognise that a small portion of the zone sits below the QM on the north side of Riccarton Road adjacent to the NZ rail line.</p>
<b>Chapter 15 Commercial</b>												
Safe or efficient operation of nationally significant infrastructure (Christchurch Airport)												
15.2.4.6 Policy – Strategic Infrastructure												
15.4.1.1 P21 and 15.4.1.5 NC <del>12</del> – Town Centre Zone - Residential activity within 50 dB Ldn Air Noise Contour <u>or the Airport Noise Influence Area</u>												
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<u>15.9.1.1 P10 - Commercial Office Zone - Preschool outside of the 50 dB Ldn Air Noise Contour or the Airport Noise Influence Area</u>												

Sub #	Provision	Position	Relief requested	Explanation
			<p><u>15.9.1.5 NC2 – Commercial Office Zone - Sensitive activities within the 50 dB Ldn Air Noise Contour or the Airport Noise Influence Area</u></p> <p>15.10.1.1 P27 and 15.10.1.5 NC1 – Mixed Use Zone – Residential activities - Internal bedroom noise reduction, <u>and Residential activities within 50 dB Ldn Air Noise Contour or the Airport Noise Influence Area.</u></p>	See the related Zone-specific submissions below.
6.	<b>Chapter 8 Subdivision Rule 8.6.1(a) and Table 1</b>	Support in part	<p>Amend Rule 8.6.1.a. as follows: Minimum net site area and dimension</p> <p>a. Allotments in the Residential Suburban, Residential Hills, Residential Large Lot Residential, Open Space Metropolitan Facilities (golf courses, Riccarton Racecourse and Wilding, Western, Kearneys and Christchurch Parks) and <del>the 50 dB Ldn Air Noise Contour or the Airport Noise Influence Area-Low Density Residential Airport Influence Zones</del> shall have a minimum dimension of 16m x 18m.</p> <p>Amend Table 1 Minimum net site area – residential zones by deleting clause d and e that refer to the “Low Density Residential Airport Influence Zone” and the “Low Density Residential Airport Influence Zone – Airport Influence Density Precinct”.</p> <p>Amend Table 6 “Allotments with existing or proposed buildings” clauses a and b by removal of the references to the “Low Density Residential Airport Influence Zone”</p>	<p>The reference to the Low Density Residential Airport Influence Zones is an error and should, instead, refer to the QM.</p> <p>As above, these references are incorrect and are not required as the table retains the density standards for the Residential Suburban and Residential Suburban Density Transition zones that sit beneath the QM.</p> <p>As above.</p>

Sub #	Provision	Position	Relief requested	Explanation
			and the “Low Density Residential Airport Influence Zone – Airport Influence Density Precinct”.	
7.	<b>Chapter 14 Residential Objectives and Policies</b> Policy 14.2.3.2	Support	Retain new Policy 14.2.3.2 14.2.3.2 Policy - MDRS Policy 2 a. Apply the MDRS across all relevant residential zones in the district plan except in circumstances where a qualifying matter is relevant (including matters of significance such as historic heritage and the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga).	CIAL supports policy 14.2.3.2 for the reasons outlined above in submission 2.
8.	<b>Chapter 14 Residential Objectives and Policies</b> Objective 14.2.4 and Policy 14.2.4.1	Support	Retain Objective 14.2.4 and related policy 14.2.4.1 14.2.4 Objective - Strategic infrastructure a. Development of sensitive activities does not adversely affect the efficient operation, use, and development of Christchurch International Airport and Port of Lyttelton, the rail network, the National Grid and the identified 66kV and 33kV electricity distribution lines and the Heathcote to Lyttelton 11kV electricity distribution line, the state highway network, and other strategic infrastructure. 14.2.4.1 Policy - Avoidance of adverse effects on strategic infrastructure a. Avoid reverse sensitivity effects on strategic infrastructure including: i. Christchurch International Airport...	CIAL supports objective 14.2.4 and policy 14.2.4.1 for the reasons outlined above in submission 2.
9.	<b>Chapter 14 Residential Objectives and Policies</b> Policy 14.2.5.11	Support	Retain new Policy 14.2.5.11 14.2.5.11 Policy – Managing site-specific Residential Large Lot development a. Enable development within mixed density precincts in a way that:	CIAL supports policy 14.2.5.11 for the reasons outlined above in submission 2.

Sub #	Provision	Position	Relief requested	Explanation
			i. Within the Rural Hamlet area, avoids reverse sensitivity to airport activities and surrounding rural environment...	
10.	<b>Chapter 14 Residential</b> Residential Suburban zone and Residential Suburban Density Transition zone. Rule 14.4.1.3	Support in part	Amend Rule 14.4.1.3 RD30 as follows: a. Activities and buildings that do not meet one or more of the activity specific standards in Rule 14.4.1.1 (except for P16 - P18 standard ix. relating to noise sensitive activities in the 50 dB Ldn Air Noise Contour <del>and</del> <u>or</u> the Qualifying Matter Airport Noise Influence Area, refer to Rule 14.4.1.3 RD30 <del>4</del> ; or P16-P19 standard x. relating to storage of heavy vehicles, refer to Rule 14.4.1.4 D2) for...	PC14 proposes to change the existing reference in the rule from RD34 to RD30. It is unclear why this is proposed and CIAL consider it to be an error. Given this, the reference to RD34 should be retained.
11.	<b>Chapter 14 Residential</b> Residential Suburban zone and Residential Suburban Density Transition zone. Rule 14.4.1.3	Support in part	Amend rule 14.4.1.3 RD34 as follows: a. The following activities and facilities located within the 50 dB Ldn Air Noise Contour <del>and</del> <u>or</u> the Qualifying Matter Airport Noise Influence Area as shown on the Planning Maps: i. Residential activities which are not provided for as a permitted or controlled activity <u>in this Chapter and which do not comply with:</u> <ul style="list-style-type: none"> <li>• <u>14.4.2.1 Site density; or</u></li> <li>• <u>14.4.2.3 Building height; or</u></li> <li>• <u>14.4.2.4 Site coverage; or</u></li> <li>• <u>14.4.2.5 Outdoor living space;</u></li> </ul> ii. Education activities (Rule 14.4.1.1 P16); iii. Preschools (Rule 14.4.1.1 P17); or iv. Health care facilities (Rule 14.4.1.1 P18) v. Visitor accommodation in a heritage item Rule 14.4.1.1 P30). (Plan Change 4 Council Decision subject to appeal)	All residential activities within the contour that are restricted discretionary, discretionary or non-complying trigger RD34, regardless of which chapter of the Plan contains the rules that made the activity not permitted. This is not the intention of the rule and CIAL consider that the RDA rule should only be triggered in circumstances where the non-compliance relates to the residential chapter and a limited set of built form standards.



Sub #	Provision	Position	Relief requested	Explanation
			(Plan Change 4 Council Decision subject to appeal)  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).	
12.	<b>Planning Maps</b> Residential New Neighbourhood Zone Yaldhurst	Oppose	Amend the planning maps to remove Residential New Neighbourhood zoning and rename to Residential Suburban or Residential Suburban Density Transition zone.	A portion of land in Yaldhurst remains zoned Residential New Neighbourhood (RNN) on the proposed PC14 maps. As Chapter 14 is to be renamed Future Urban Zone (FUZ) under PC14, this would leave the RNN without any applicable zone provisions. CIAL presumes this is a mapping error and seeks that the land be identified as Residential Suburban or Residential Suburban Density Transition consistent with the surrounding residential land.
13.	<b>Chapter 14 Residential</b> Future Urban Zone Rule 14.12.1.3	Support in part	Amend rule 14.12.1.3 RD16 as follows: a. Activities and buildings that do not meet any one or more of the activity specific standards in Rule 14.12.1.1 (except for P8 to P10 activity standard ix. relating to noise sensitive activities in the 50 dB Ldn Air Noise Contour <u>or the Qualifying Matter Airport Noise Influence Area</u> refer to RD26; or P8 to P12 activity standard x. relating to storage of heavy vehicles refer to Rule 14.12.1.4 D2) for...	A reference to the Qualifying Matter is required to align with the approach taken for rule 14.4.1.3 RD30 (submission point 10).
14.	<b>Chapter 14 Residential</b> Future Urban Zone	Support in part	Amend rule 14.12.1.3 RD26 as follows:	As per submission point 11.

Sub #	Provision	Position	Relief requested	Explanation
	Rule 14.12.1.3		<p>a. The following activities located within the 50 dB Ldn Air Noise Contour <u>or the Qualifying Matter Airport Noise Influence Area</u> as shown on the Planning Maps:</p> <p>i. Residential activities which are not provided for as a permitted or controlled activity <u>in this Chapter and which do not comply with:</u></p> <ul style="list-style-type: none"> <li>• <u>14.12.2.1 building height; or</u></li> <li>• <u>14.12.2.2 site coverage; or</u></li> <li>• <u>14.12.2.3 outdoor living space; or</u></li> <li>• <u>14.12.2.14 minimum unit size; or</u></li> <li>• <u>14.12.2.16 outline development plan; or</u></li> <li>• <u>14.12.2.17 comprehensive residential developments;</u></li> </ul> <p>ii. Education activities (Rule 14.12.2.1 P8);</p> <p>iii. Preschool (Rule 14.12.2.1 P9); or</p> <p>iv. Health care facilities (Rule 14.12.2.1 P10);</p> <p>v. Visitor accommodation in a heritage item Rule 14.12.1.1 P25).</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>	
15.	<b>Chapter 14 Residential Residential Large Lot Zone</b> Rule 14.9.2.1	Support	<p>Residential activities are permitted within the zone (P1). Rule 14.9.2.1.ix specifies a minimum net site area of 2000m2.</p> <p>RDA consent (RD2) required for residential units on sites which do not meet the density standard of rule 14.9.2.1</p>	<p>These rules are existing in the Plan, with the exception of the 2000m2 rule which is inserted by PC14.</p> <p>Submission point 9 above supports new policy 14.2.5.11 which seeks to:</p>

Sub #	Provision	Position	Relief requested	Explanation
			<p>by up to 10%. Such consents shall not be limited or publicly notified. Where the 10% margin is breached a fully discretionary consent is required (D4).</p>	<p>“Enable development within mixed density precincts in a way that:</p> <ul style="list-style-type: none"> <li>i. Within the Rural Hamlet area, avoids reverse sensitivity to airport activities and surrounding rural environment...”</li> </ul> <p>This is both an enabling and avoidance policy. CCC’s position is likely to be that the avoidance occurs as a result of the 2000m2 rule which has been introduced by PC14.</p>
16.	<p><b>Chapter 15 Commercial</b> Town Centre Zone Rule 15.4.1.1 and 15.4.1.5</p>	Support in part	<p>Amend Rule 15.4.1.1 P21 as follows: Residential activity – Activity specific standard: h. The activity shall not be located within the 50 dB Ldn Air Noise Contour <u>or the Airport Noise Influence Area</u> as shown on the planning maps.</p> <p>Amend Rule 15.5.1.5 NC2 as follows: Sensitive activities within the 50 dB Ldn Air Noise Contour <u>or the Airport Noise Influence Area</u> as defined on the planning maps.</p>	<p>The permitted and non-complying activity rules refer to the “50dB Ldn Air Noise Contour”. An additional reference to the Airport Noise Influence Area Qualifying Matter is also required to give effect to the policy framework and for the reasons outlined above in submission 2.</p>
17.	<p><b>Chapter 15 Commercial</b> Local Centre Zone Rule 15.5.1.1 (P21) and 15.5.1.5 (NC2)</p> <p>Neighbourhood Centre Zone Rule 15.6.1.1 (P19) and 15.6.1.5 (NC2)</p> <p>Commercial Office Zone</p>	Support in part	As per submission point 16 above, references to the Airport Noise Influence Area need to be added to the identified rules.	As above.

Sub #	Provision	Position	Relief requested	Explanation
18	<p>Rule 15.9.1.1 (P10) and</p> <p><b>Chapter 15 Commercial Mixed Use Zone</b>            Rule 15.10.1.1 (P27) and 15.10.1.5 (NC1)</p>	Support in part	<p>Amend Rule 15.10.1.1 P27 by inserting a new activity standard f as follows:</p> <p><u>f. The activity shall not be located within the 50 dB Ldn Air Noise Contour or the Airport Noise Influence Area as shown on the planning maps.</u></p> <p>Consequential renumbering of existing activity standards that follow and rule reference renumbering as required.</p> <p>Amend Rule 15.10.1.5 N1 as follows:            NC1 Any residential activity not meeting Rule 15.10.1.1 P27 (e) <u>or (f)</u>.</p>	A small portion of the MUZ sites beneath the QM on the north side of Riccarton Road adjacent to the NZ Rail line. Amendments to the rules are required for the reasons outlined in submission points 2 and 16 above.
19	<p><b>Chapter 13.6 Specific Purpose (School) Zone</b>            Appendices 13.6.6.1, 13.6.6.2 and 13.6.6.3</p> <p><b>Chapter 13.7 Specific Purpose (Tertiary Education) Zone</b>            Appendix 13.7.6.1</p>	Oppose	Amend Appendices 13.6.6.1, 13.6.6.2, 13.6.6.3 and 13.7.6.1 to ensure that sites beneath the 50 dB Ldn Air Noise Contour or the Airport Noise Influence Area retain the operative plan Residential Suburban or Residential Suburban Transition Zone.	Permitted activity rules 13.6.4.1.1 P4 and 13.7.4.1.1 P3 provide for additional activities or facilities which would be permitted activities in the alternative zone listed for the site listed in Appendices 13.6.6.1, 13.6.6.2, 13.6.6.3 and 13.7.6.1. PC14 proposes to amend a number of the residential zones listed in the Appendices to reflect the nearby/adjacent HRZ or MRZ zones. There are a number of existing schools, and the University of Canterbury site, that sit beneath the QM. Under the PC14 proposal this would enable intensification under the MRZ or HRZ provisions. Given this, the existing operative Plan zoning references should be retained

Sub #	Provision	Position	Relief requested	Explanation
				for the reasons outlined in submission point 2 above.
20	<b>Chapter 6.5 Scheduled Activities</b> Rule 6.5.6	Oppose	Amend rule 6.5.6 to ensure that sites beneath the 50 dB Ldn Air Noise Contour or the Airport Noise Influence Area retain the operative plan Residential Suburban or Residential Suburban Transition Zone.	<p>Chapter 6.5 prescribes provisions for scheduled activities across the city. Clause 6.5.3, How to interpret and apply the rules, notes that:</p> <ul style="list-style-type: none"> <li>a. <i>Any activity, other than the scheduled activity identified in Rule 6.5.6, shall be subject to the provisions of the zone listed in Rule 6.5.6 and shown on the Planning Maps.</i></li> </ul> <p>PC14 proposes to amend a number of the residential zones listed in rule 6.5.6 to reflect the nearby/adjacent HRZ or MRZ zones. There are a number of scheduled activities sit beneath the QM. Under the PC14 proposal this would enable intensification under the MRZ or HRZ provisions. Given this the existing operative Plan zoning references should be retained for the reasons outlined in submission point 2 above.</p>

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Jo **Last name:** Appleyard

**Organisation:** Lyttelton Port Company Limited

**On behalf of:**

**Preferred method of contact** Email

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Cashel Street

**Suburb:**

**City:**

**Country:** New Zealand

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I could not

Gain an advantage in trade competition through this submission

I am not

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

a. adversely affects the environment, and

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

Note to person making submission:

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

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

Yes

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

Additional requirements for hearing:

### Attached Documents

File

LPC submission on PC14

## Form 5

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

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

**To** Christchurch City Council

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

- 1 This is a submission on the proposed Housing and Business Choice Plan Change to the Christchurch District Plan (*PC14*).
- 2 LPC could not gain an advantage in trade competition through this submission.
- 3 The specific provisions of *PC14* that LPC's submission relates to and the reasons for LPC's submission are set out in **Appendix 2**.
- 4 The general and specific reasons for LPC's relief sought in **Appendix 2** are set out in full in **Appendix 1**.
- 5 LPC seeks the following decisions from the Hearings Panel on behalf of Christchurch City Council:
  - 5.1 Grant the relief as set out in **Appendix 2**; and
  - 5.2 Grant any other similar or consequential relief that would address LPC's concerns set out in this submission.
- 6 LPC wishes to be heard in support of the submission.
- 7 If others make a similar submission, LPC will consider presenting a joint case with them at a hearing.

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



---

Jo Appleyard  
Partner  
12 May 2023

Address for service of submitter:

Lyttelton Port Company Limited

c/- Annabelle Lee  
 Chapman Tripp  
 Email address: annabelle.lee@chapmantripp.com

## APPENDIX 1

### Overview

- 1 Lyttelton Port Company Limited (*LPC*) welcomes the opportunity to submit on the proposed Housing and Business Choice Plan Change to the Christchurch District Plan (*PC14*).
- 2 *LPC* also notes and appreciates the consultation undertaken by Christchurch City Council (*CCC*) in its preparation of *PC14*.

### *Lyttelton Port*

- 3 Lyttelton Port of Christchurch (*Lyttelton Port*) is the South Island's major deep-water Port and is New Zealand's third largest container terminal by volume, after Port of Tauranga and Ports of Auckland.
- 4 Lyttelton Port is the primary international gateway for the South Island, with Christchurch being the major distribution centre for inbound goods. Export customers include a wide variety of dairy, meat, forestry, horticultural, and manufacturing businesses, as well as coal which is an important export for the west coast region.
- 5 *LPC* employs approximately 650+ staff in operational, management and administration roles. Furthermore, there are approximately 1000 people employed by companies operating at Lyttelton Port.

### *CityDepot*

- 6 CityDepot on Chapmans Road is an 'Inland Port' that has a direct connection with the container terminal at Lyttelton Port. CityDepot is the closest container depot site to Lyttelton Port and has the benefit of an existing rail siding.
- 7 CityDepot operates 24 hours a day for five and a half days a week and has good access to the State Highway network and to the rail network via the 24 wagon rail siding.
- 8 CityDepot is an integral and integrated component within the infrastructure of Lyttelton Port. The facility enables *LPC* to better optimise container movements on and off the wharf for its key customers and cannot be distinguished in a functional or operational sense from the remainder of Lyttelton Port activities.

### **Summary of *LPC* submission on *PC14***

- 9 The importance of Lyttelton Port (including CityDepot) is reflected in various higher-order statutory documents:
  - 9.1 The New Zealand Coastal Policy Statement recognises that a sustainable transport system requires an efficient network of safe ports, servicing national and international shipping.



- 9.2 The National Policy Statement on Urban Development (*NPS-UD*) defines port facilities of a port company as nationally significant infrastructure.
- 9.3 The Canterbury Regional Policy Statement (*CRPS*) lists Lyttelton Port as 'strategic infrastructure;' and, by definition, strategic infrastructure is deemed to be regionally significant infrastructure.
- 9.4 Consistent with the *CRPS*, the Christchurch District Plan lists Lyttelton Port as strategic infrastructure.
- 10 The port operations at Lyttelton Port and CityDepot are close to existing residential areas that are zoned residential.
- 11 The Christchurch District Plan contains comprehensive provisions that implement these higher-order documents in order to ensure the ongoing safe and efficient operation of Lyttelton Port and CityDepot, including managing the impacts of noise generated by LPC's operations and reverse sensitivity effects.
- 12 LPC's primary concern with PC14 is to ensure the planning framework continues to protect and appropriately manage its operations. In summary, with regards to PC14 LPC's key submission points are:
- 12.1 Support/retention of the Lyttelton Port Influences Overlay qualifying matter, including the underlying density controls.
- 12.2 Addition of an Inland Port Influences Overlay qualifying matter.
- 12.3 Removal of the Tsunami Management Area qualifying matter from CityDepot.
- 13 These and LPC's other submission points are explained in the sections below and in the table in **Appendix 2**.

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

***National Policy Statement on Urban Development***

- 14 The *NPS-UD* directs that local authority decisions on urban development are to be integrated with infrastructure planning decisions,<sup>1</sup> and that planning decisions contribute to well-functioning urban environments.<sup>2</sup>
- 15 A well-functioning urban environment is one in which:
- 15.1 infrastructure – particularly nationally significant infrastructure such as Lyttelton Port (and CityDepot) – is not adversely affected by incompatible activities; and

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<sup>1</sup> Objective 6.

<sup>2</sup> Policy 1.

- 15.2 urban growth is planned with infrastructure provisions in mind, recognising that the two run hand-in-hand.
- 16 While NPS-UD Policy 3 directs councils to increase density and realise as much development capacity as possible in urban environments, Policy 4 allows district plans applying to tier 1 urban environments to modify the relevant building height or density requirements to the extent necessary to accommodate a qualifying matter.
- 17 Qualifying matters include, relevantly:

*any matter for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure.*

***The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021***

- 18 The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (*Enabling Housing Act*) was introduced to speed up implementation of the NPS-UD, whereby councils were required to incorporate Medium Density Residential Standards (*MDRS*) into every relevant residential zone, provided that the MDRS may be less enabling of development where a qualifying matter applies.<sup>3</sup>
- 19 Consistent with the NPS-UD definition above, qualifying matters include matters required to ensure the safe or efficient operation of nationally significant infrastructure (such as Lyttelton Port).<sup>4</sup>
- 20 Where a qualifying matter is already provided for in an operative district plan, it is defined under the Enabling Housing Act as an “existing qualifying matter” and is, in effect, pulled through in the process of incorporating the MDRS in the relevant district plan.<sup>5</sup>

**Existing Christchurch District Plan provisions**

- 21 The Christchurch District Plan contains a number of provisions that recognise and provide for the safe, efficient and effective operation and development of Lyttelton Port:

21.1 Strategic Objective 3.3.13(a) states that:

*the social, economic, environmental, and cultural benefits of infrastructure, including strategic infrastructure, are recognised and provided for, and its safe, efficient and effective development, upgrade, maintenance and operation is enabled.*

Lyttelton Port is specifically listed as strategic infrastructure.

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<sup>3</sup> Resource Management Act 1991 (*RMA*), s 80F(1)(a).

<sup>4</sup> RMA, s 77I(e).

<sup>5</sup> RMA, s 77K.

21.2 Strategic Objective 3.3.13(b) states that:

*strategic infrastructure, including its role and function, is protected from incompatible development and activities by avoiding adverse effects from them, including reverse sensitivity effects.*

21.3 The Christchurch District Plan defines reverse sensitivity as follows:

*meaning the effect on existing lawful activities from the introduction of new activities, or the intensification of existing activities in the same environment, that may lead to restrictions on existing lawful activities as a consequence of complaints.*

### **Proposed PC14 provisions**

#### **Lyttelton Port Influences Overlay**

- 22 PC14 includes the "Lyttelton Port Influences Overlay" as an "existing qualifying matter" to ensure the safe and efficient operation of Lyttelton Port and its protection from reverse sensitivity effects.
- 23 The proposed approach is to restrict residential intensification within the Lyttelton Port Influences Overlay to the levels currently provided for in the Christchurch District Plan and not allow that density to increase.
- 24 LPC supports this approach and, in terms of the relevant matters in section 77K(1) of the Enabling Housing Act, notes that:
- 24.1 Under the Christchurch District Plan, the Lyttelton Port Influences Overlay and associated rules were introduced to control activities that are sensitive to port noise and to identify properties eligible for acoustic treatment. LPC supports the spatial extent of the Lyttelton Port Influences Overlay qualifying matter as identified by CCC in PC14.<sup>6</sup>
- 24.2 Within the Lyttelton Port Influences Overlay, LPC supports the density standards in PC14 which are proposed to remain the same as those in the Christchurch District Plan.<sup>7</sup>
- 24.3 The Lyttelton Port Influences Overlay applies to areas already identified in the Christchurch District Plan as areas where reverse sensitivity effects from incompatible land use on Lyttelton Port must be avoided.<sup>8</sup>

#### **CityDepot – Inland Port Influences Overlay**

- 25 There is currently no overlay associated with CityDepot in the Christchurch District Plan. This is a result of the history of the establishment of this site and also the fact that LPC has had limited opportunity to consider and pursue this planning matter,

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<sup>6</sup> RMA, s 77K(1)(a) – Identify by location where an existing qualifying matter applies.

<sup>7</sup> RMA, s 77K(1)(b) – Specify the alternative density standards.

<sup>8</sup> RMA, s 77K(1)(c) – Identify why a qualifying matter applies to the areas under (a).

particularly given the focus in the last decade has been on the recovery of Lyttelton Port after the Canterbury earthquake sequence.

- 26 CityDepot has always been subject to the noise limits specified in the Christchurch District Plan. These noise limits are measured and set at the site receiving the noise. There is a Residential Hills Zone that is located on the opposite side of State Highway 76 (Port Hills Road) from CityDepot, which runs north towards Opawa Road.
- 27 The development enabled by the MDRS on residential sites on Port Hills Road may result in an increase in the number of people subject to noise from CityDepot. This is particularly the case given the increased building heights and may expose LPC to reverse sensitivity effects which could constrain the operation of CityDepot.
- 28 It is important to recognise that CityDepot constitutes "port facilities" and is of national significance the same way that Lyttelton Port is.
- 29 As outlined above, the MDRS may be made less enabling of development to the extent necessary to accommodate qualifying matters, which include matters required to ensure the safe or efficient operation of nationally significant infrastructure.<sup>9</sup>
- 30 On this basis, LPC proposes the inclusion in PC14 of an additional qualifying matter for CityDepot, the "Inland Port Influences Overlay". This is proposed in order to address the potential for reverse sensitivity issues at CityDepot and ensure the safe and efficient functioning of CityDepot as an element of LPC's port facilities. It would cover properties in the nearby Residential Hills Zone but only to the extent of requiring noise mitigation for habitable spaces in certain circumstances.
- 31 More specifically, CityDepot is required to screen noise up to a height of a two-storey high dwelling located on the opposite side of Port Hills Road. However, screening three-storey buildings from noise is unrealistic given the higher elevation of the residential properties located on the other side of Port Hills Road. The proposed rule applying in the new Inland Port Influences Overlay addresses this issue. Further detail is provided at **Appendix 2**.

### ***Industrial Interface Overlay***

- 32 PC14 has also introduced, as a qualifying matter, an Industrial Interface Qualifying Matter. The Industrial Interface Overlay applies to part of the Residential Hills Zone on the other side of Port Hills Road from CityDepot and LPC's Civil Maintenance Yard in Lyttelton; and, in principle, is supported.
- 33 However, there appears to be two problems with the Industrial Interface Overlay located on the other side of Port Hills Road. First, PC14 has, inadvertently, failed to introduce rules to restrict residential intensification within the Industrial Interface Overlay for the Residential Hills Zone.

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<sup>9</sup> RMA, s 77I(e).

- 34 The Residential Suburban Zone, on the other hand, has introduced a built form standard that restricts the height of buildings to 7m high or two storeys whichever is the lesser within the Industrial Interface Overlay (Rule 14.4.2.3 (v)). An equivalent built form standard applying to Residential Hills Zone on the other side of Port Hills Road would address LPC's concerns.
- 35 As outlined above, CityDepot can screen noise up to a height of a two-storey high dwelling located the opposite side of Port Hills Road. However, screening three-storey buildings from noise is unrealistic given the higher elevation of the residential properties located on the other side of Port Hills Road.
- 36 The second potential problem with the Industrial Interface Overlay relates to its spatial extent. Planning Map 47 displayed on the interactive website shows the Industrial Interface Overlay having a nominal width, which does not necessarily coincide with the parcel boundaries of the affected residential properties. The entire residential property parcels should be included for properties between 311 – 321 Port Hills Road. Otherwise, there might remain the potential for a three-storey building to be constructed at the south-western end of a property and the potential for reverse sensitivity effects could result. LPC accordingly seeks an extension of this qualifying matter for the full spatial extent shown on **Appendix 3**
- 37 To be clear, LPC's interests in this respect are limited to residentially zoned land in proximity to CityDepot. For this reason, its specific relief seeks an "Inland Port" sub-area for the qualifying matter, or other similar relief that achieves the same intent.

#### ***Tsunami Management Area***

- 38 There may be instances where residential activities are provided for within certain Industrial Zones and CCC may wish to introduce certain restrictions on residential intensification. However, CityDepot is zoned Industrial General Zone and Industrial Heavy Zone. On this basis, the introduction of the Tsunami Management Area Overlay on this land appears outside the scope of PC14.
- 39 In any case, the Industrial General Zone and the Industrial Heavy Zones regulate residential activities as discretionary and non-complying activities respectively (see Rules 16.4.1 (D1) and 6.5.1.5 (NC4)). Any application for resource consent would need to address all effects on the environment, including any effects from natural hazards. Consequently, there is no rationale for the introduction of the Tsunami Management Area Overlay over land occupied by CityDepot.
- 40 LPC opposes any Tsunami Management Area Overlay being introduced over its facilities as it would prejudice a future submission in the event further provisions on industrial activities are introduced later.

#### **Conclusion**

- 41 CCC has appropriately recognised the Lyttelton Port Influences Overlay as a qualifying matter required to avoid reverse sensitivity effects on activities at Lyttelton Port.

- 42 However, for the reasons set out in this submission, LPC consider certain amendments are required to PC14 to fully ensure the safe and efficient operation and development of Lyttelton Port (including CityDepot).

**APPENDIX 2**

The drafting suggested in this appendix reflects the key changes LPC seeks. Consequential amendments may also be necessary to other parts of the proposed provisions.

LPC proposes drafting below and seeks that this drafting, or drafting with materially similar effect, be adopted by CCC.

<b>Provision</b>	<b>Position</b>	<b>Relief requested</b>	<b>Explanation</b>
<b>General</b>			
6.1A.1 Application of qualifying matters	Support.	Retain 6.1A.1 as notified.	LPC supports the inclusion of 6.1A to explain qualifying matters and that they justify development less enabling than MDRS.  In particular, LPC supports identification of the Residential Industrial Interface qualifying matter and the Lyttelton Port Influences Overlay.
6.10A Tree Canopy Cover and Financial Contributions	Neutral.	Ensure LPC's facilities remain exempt from requirements.	LPC understands that the rules, as notified, do not apply to its facilities. LPC supports this position, on the basis that it would be unworkable in the areas where LPC infrastructure is located, and has the potential to impact port operations.

Provision	Position	Relief requested	Explanation
<b>Residential chapter</b>			
14.1 Introduction  e. ...	Support.	Retain 14.1 as notified.	LPC supports new subsection e. in so far as it identifies that the Enabling Act allows MDRS to be reduced where justified by a “qualifying matter”.
14.2.3.2 Policy – MDRS Policy 2  <i>a. Apply the MDRS across all relevant residential zones in the district plan except in circumstances where a qualifying matter is relevant (including matters of significance such as historic heritage and the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga).</i>	Support.	Retain policy as notified.	LPC supports the policy direction to apply MDRS except where a qualifying matter applies.
14.3 How to interpret and apply the rules  <i>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...</i>	Support.	Retain as notified.	LPC supports the identification of qualifying matters that modify that MDRS.  In particular, it supports identification of the Lyttelton Port Influence Area (xviii.) and Industrial Interface (xxi.) qualifying matters.



Provision	Position	Relief requested	Explanation
			LPC also seeks the inclusion of a new Inland Port Influences Overlay qualifying matter.
<b>Lyttelton Port Influences Overlay</b>			
<p>Planning Maps</p> <p>Qualifying Matter – Lyttelton Port Influences Overlay</p>	Support.	Retain “Qualifying Matter – Lyttelton Port Influences Overlay” as notified.	<p>As explained in <b>Appendix 1</b>, the intensification of residential activity enabled by MDRS under PC14 must be avoided in areas where it could generate reverse sensitivity effects on Lyttelton Port operations as nationally significant infrastructure.</p> <p>PC14 necessarily includes a qualifying matter to protect Lyttelton Port. The planning maps correctly identify all areas in Lyttelton where the qualifying matter applies and where development to MDRS is inappropriate.</p>
<p>14.8.3 Area-specific rules – Residential Banks Peninsula Zone</p> <p>14.8.3.1.1 – 14.8.3.1.5</p>	Support.	Retain area-specific activities for Residential Banks Peninsula Zone as notified.	LPC supports area-specific rules for the Residential Banks Peninsula Zone, specifically the inclusion of rules on development that remain the same as those within the Christchurch District Plan.

Provision	Position	Relief requested	Explanation
Chapters 14 and 15 – Residential Banks Peninsula Zone and Commercial Banks Peninsula Zone	Support.	Retain without amendment all provisions that apply to or refer to the Lyttelton Port Influences Overlay as notified.	LPC supports the area-specific rules implementing the Lyttelton Port Influences Overlay.
<b>Inland Port Influences Overlay</b>			
<p>Planning Maps</p> <p>Qualifying Matter – Inland Port Influences Overlay</p>	Oppose.	Include new “Qualifying Matter – Inland Port Influences Overlay”.	<p>As explained in <b>Appendix 1</b>, the intensification of residential activity enabled by MDRS under PC14 must be avoided in areas where it could generate reverse sensitivity effects on CityDepot operations as nationally significant infrastructure.</p> <p>LPC accordingly seeks the inclusion of a new Inland Port Influences Overlay qualifying matter to ensure the safe and efficient operation and development of CityDepot.</p> <p>The spatial extent of the new Inland Port Influences Overlay is shown by the purple hashed area in <b>Appendix 3</b>.</p>
Qualifying Matter – Inland Port Influences Overlay	Oppose.	<p>Insert as follows:</p> <p><i>Rule XXX – Habitable space near the Inland Port</i></p>	LPC seeks the inclusion of a new rule to apply in the “Lyttelton Port Influences Overlay” in the Residential Hills Zone to protect CityDepot operations.

Provision	Position	Relief requested	Explanation
New Rule in Residential Hills Zone		<p><i>a. Any new or extensions to existing habitable space of any development located within the Inland Port Influences Overlay shall be designed and constructed so that noise in any habitable space from the Inland Port will not exceed internal sound design level of 30dB LAeq with ventilating windows or doors open or with windows or doors closed and mechanical ventilation installed and operating.</i></p> <p><i>b. Determination of the internal design sound levels required under Clause (a), including any calculations, shall be based on noise from the Inland Port as follows:</i></p> <p><i>i. 50dB LAeq on any façade facing north to north-east towards the Inland Port;</i></p> <p><i>ii. 47dB LAeq on any façade within 90 degrees of facing north to north-east and has partial line of sight to any part of Inland Port;</i></p> <p><i>c. Compliance with this rule shall be demonstrated by providing the Council with a design report prior to</i></p>	<p>This is a targeted rule intended to address potential reverse sensitivity effects on CityDepot as a result of intensification of residential activity within the specified area shown in <b>Appendix 3.</b></p>

Provision	Position	Relief requested	Explanation
		<p><i>the issue of the building consent, which is prepared by a suitably qualified acoustics specialist, stating that the design proposed will meet the required internal noise levels.</i></p>	
<b>Industrial Interface Qualifying Matter Area</b>			
<p>Planning Maps - 47</p> <p>Qualifying Matter – Industrial Interface</p>	<p>Oppose.</p>	<p>Extend “Qualifying Matter – Industrial Interface” to cover spatial extent of land identified at <b>Appendix 3</b> and include “Inland Port” sub-area.</p>	<p>While LPC’s preferred relief is a new Inland Port Influences Overlay, LPC notes that the Industrial Interface qualifying matter could afford some protection for its CityDepot and the Civil Maintenance Yard in Lyttelton.</p> <p>As explained in <b>Appendix 1</b>, CityDepot is an integral part of port operations and is largely surrounded by industrial activity at present. Residential intensification is inappropriate in close proximity to CityDepot and the PC14 must protect against reverse sensitivity effects.</p> <p>LPC therefore supports this qualifying matter, but seeks that its spatial extent cover the relevant residential area in close proximity to CityDepot shown by the purple hashed area in <b>Appendix 3</b>.</p>

Provision	Position	Relief requested	Explanation
			For the avoidance of doubt, LPC's interest in this respect is limited to effects on CityDepot.
<p>14.2.12 Objective – Compatibility with industrial activities</p> <p>a. New residential development is not adversely affected by noise generated from industrial activities and the development does not affect the operation of industrial activities within industrial zones.</p>	Support.	Retain objective as notified.	<p>LPC supports the direction that new residential development must not affect the operation of industrial activities within industrial zones.</p> <p>CityDepot is currently zoned "Industrial General Zone" and "Industrial Heavy Zone", and the Civil Maintenance is "Industrial General Zone". It is important that new residential activity does not impact LPC's operations.</p>
<p>14.2.12.1 Policy – Managing effects on industrial activities</p> <p>a. Restrict new residential development of three or more storeys within proximity to industrial zoned sites where it would give rise to reverse sensitivity effects on industrial activities and/or adversely affect the health and safety of residents, unless mitigation sufficiently addresses the effects.</p>	Support.	Retain policy as notified.	<p>LPC supports restriction of residential development where it would give rise to reverse sensitivity effects on industrial activities.</p> <p>CityDepot is currently zoned "Industrial General Zone" and "Industrial Heavy Zone" and the Civil Maintenance Depot is "Industrial General Zone". It is important that new residential activity does not impact its operations.</p>

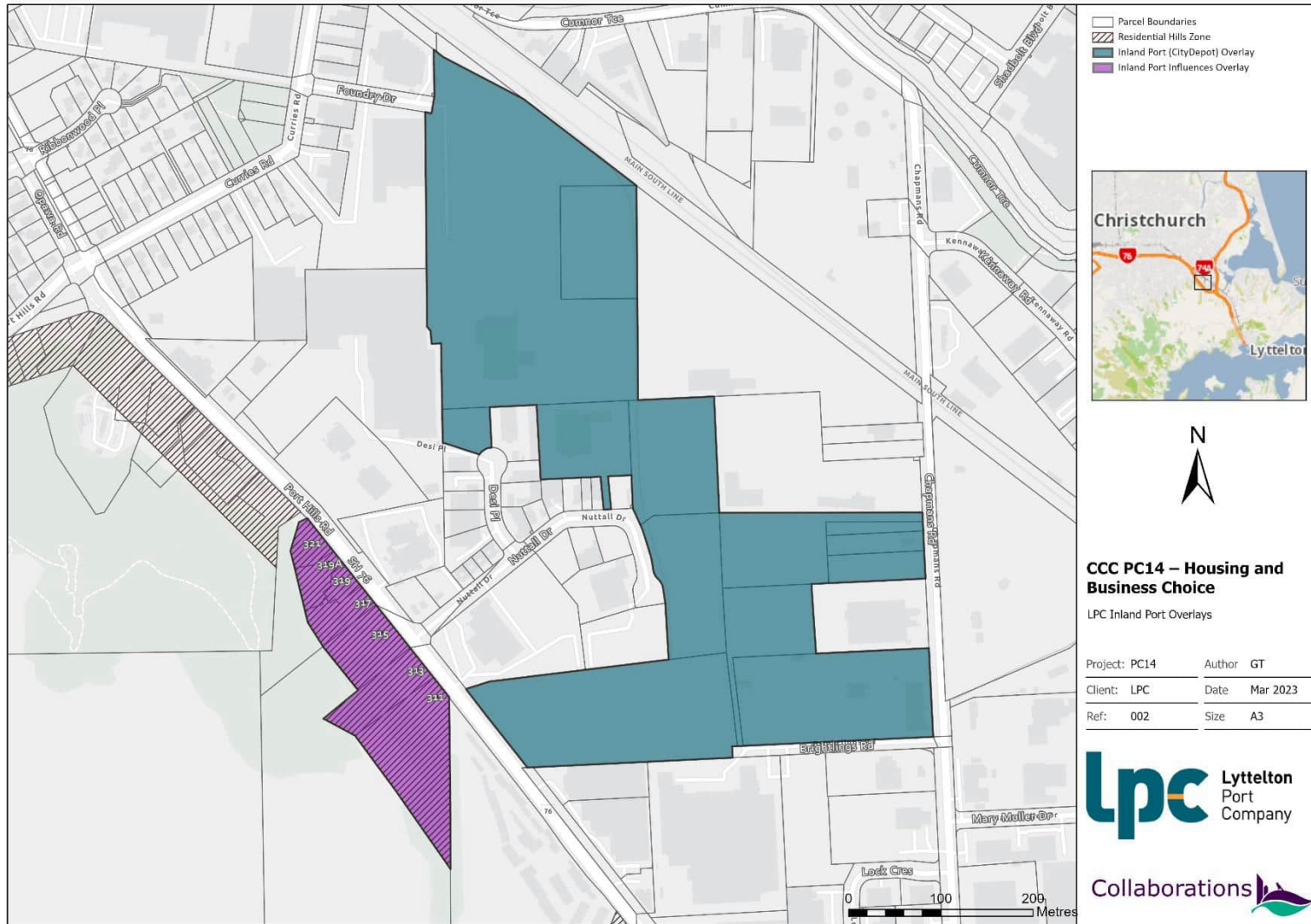
Provision	Position	Relief requested	Explanation
New discretionary activity in Residential Hills Zone.	Oppose.	Insert as follows:  <i>Any building for a residential activity that does not meet Rule [x] Building height within the Industrial Interface Qualifying Matter Area, Inland Port Sub-Area.</i>	LPC notes that this rule is proposed for the Residential Suburban, Residential Suburban Density Transition, Medium Density and High Density Residential Zones.  It is also important that the Residential Hills Zone in close proximity to CityDepot also contains a limit on building height within the Industrial Interface Qualifying Matter.
New standard for building height	Oppose.	Insert as follows:  <i>Any building for a residential activity within the Industrial Interface Qualifying Matter Area, Inland Port Sub-Area: 7 metres or 2 storeys, whichever is the lesser.</i>	LPC notes that this rule is proposed for the Residential Suburban, Residential Suburban Density Transition, Medium Density and High Density Residential Zones.  It is also important that the Residential Hills Zone in close proximity to CityDepot also contains a limit on building height within the Industrial Interface qualifying matter.
<b>Tsunami Management Area</b>			
Planning Maps  Qualifying Matter – Tsunami Management Area	Oppose.	Remove Tsunami Management Area qualifying matter from LPC’s CityDepot site in Hillsborough.	LPC opposes the application of the Tsunami Management Area Overlay to its CityDepot site on Planning Map 47.

Provision	Position	Relief requested	Explanation
			<p>This is out of scope of the plan change.</p> <p>Additionally, there is no rationale for its application given residential activities are not provided for in the "Industrial General Zone" nor the "Industrial Heavy Zone" which currently apply to the site.</p> <p>LPC is concerned that the proposed qualifying matter may unintentionally restrict its ability to operate, maintain and upgrade the CityDepot facilities in the future.</p>
<p>Policy 5.2.2.5.2 – Managing development within Qualifying Matter Tsunami Management Area</p> <p>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.</p>	Oppose.	Remove Tsunami Management Area qualifying matter from LPC's CityDepot site in Hillsborough.	LPC is neutral on this policy provided the CityDepot site is excluded from the Qualifying Matter Area.
<p>5.4A Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area</p>	Oppose.	Remove Tsunami Management Area Qualifying matter from LPC's CityDepot site in Hillsborough.	LPC is neutral on the proposed rule framework within the Qualifying Matter Tsunami Management Area provided the

Provision	Position	Relief requested	Explanation
<p><i>5.4A.1 Permitted activities</i></p> <p><i>a. There are no permitted activities</i></p>			<p>CityDepot site is excluded from the Qualifying Matter Area.</p> <p>It is critical that LPC's infrastructure, which is regionally and nationally significant, is not subject to restrictive rules such as 5.4A.1 which provides that there are no permitted activities. This is highly likely to impact LPC's ability to operate, maintain and upgrade infrastructure at CityDepot.</p>
<p>5.4A Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area</p> <p><i>NC3</i></p> <p><i>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.</i></p>	Oppose.	Remove Tsunami Management Area Qualifying matter from LPC's CityDepot site in Hillsborough.	<p>LPC is neutral on the proposed rule framework within the Qualifying Matter Tsunami Management Area provided the CityDepot site is excluded from the Qualifying Matter Area.</p> <p>While LPC's activities would not be impacted by the proposed non-complying activity status for residential intensification within the Qualifying Matter Tsunami Management Area, it is appropriate for CityDepot to be exempt from the proposed rule framework entirely.</p>



**APPENDIX 3 – SPATIAL EXTENT OF AFFECTED RESIDENTIAL ZONED PROPERTIES NEAR CITYDEPOT**



## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Jo **Last name:** Appleyard

**Organisation:** Orion New Zealand Limited

(Orion)

**On behalf of:**

**Preferred method of contact** Email

**Postal address:** 60 Cashel Street

**Suburb:**

**City:**

**Country:** New Zealand

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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

Orion submission on PC14 v1

## 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: Orion New Zealand Limited (*Orion*)

- 1 This is a submission on the proposed Housing and Business Choice Plan Change to the Christchurch District Plan (*PC14*).
- 2 Orion could not gain an advantage in trade competition through this submission.
- 3 The specific provisions of PC14 that Orion's submission relates to and the reasons for Orion's submission are set out in **Appendix A** and **Appendix B** below.
- 4 Orion's submission relates to the whole proposal. The general and specific reasons for Orion's relief sought in **Appendix B** are set out in **Appendix A**.
- 5 Orion seeks the following decision from the local authority:
  - 5.1 Grant the relief as set out in **Appendix A and B**;
  - 5.2 Grant any other similar relief that would deal with Orion's concerns set out in this submission.
- 6 Orion wishes to be heard in support of the submission.
- 7 If others make a similar submission, Orion will consider presenting a joint case with them at a hearing.

**Signed** for and on behalf of Orion New Zealand Limited by its solicitors and authorised agents Chapman Tripp



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Jo Appleyard  
Partner  
12 May 2023

Address for service of submitter:

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## APPENDIX A

### Overview

- 1 Orion New Zealand Limited (*Orion*) welcomes the opportunity to submit on the proposed Housing and Business Choice Plan Change to the Christchurch District Plan (*PC14*).
- 2 At the outset, Orion wishes to acknowledge the collaborative approach of Christchurch City Council (*CCC*) during the pre-notification consultation period. This has narrowed the areas of potential contention and Orion is generally supportive of *PC14* as notified.

### Background

- 3 Orion owns and operates the electricity distribution network covering approximately 8000 square kilometres across Christchurch and central Canterbury, between the Waimakariri and Rakaia Rivers. Orion is a community owned entity; Christchurch City Holdings Limited (owned by *CCC*) owns 89% of Orion and the Selwyn District Council owns 11%.
- 4 The electricity distribution network, including Orion's significant electricity distribution lines (*SEDLS*) is critical, strategic and regionally significant infrastructure:
  - 4.1 Orion delivers electricity to approximately 220,000 homes and businesses throughout Christchurch City and Selwyn District. The network covers around 8,000km<sup>2</sup> and includes 11,500km of overhead lines and underground cables, 50 zone substations, 396 steel sub transmission towers, 90,000 power poles and 11,700 distribution substations.
  - 4.2 Orion is responsible for the establishment, operation, maintenance and upgrade of the electricity distribution network. As a lifeline utility, Orion must be able to continue operating the electricity distribution network to the fullest extent possible, during and after an emergency – resilience and easy access to lines for maintenance is key to fulfilling this obligation.<sup>1</sup>
  - 4.3 The electricity distribution network has a crucial role in securing New Zealand's decarbonisation and climate change adaptation goals – supporting a transition to a low emissions economy.
  - 4.4 Orion's *SEDLS* are the backbone of the network – delivering sub-transmission voltages (66,000V and 33,000V) to a number of substations across the network so that electricity can be transformed down to lower voltages and delivered to customers.
- 5 It is important that *PC14* enable the continued safe and efficient operation, maintenance, use and development of the electricity distribution network and must also protect the *SEDLS* from reverse sensitivity effects. In particular, it is vital that *PC14* protect existing *SEDL*'s as residential intensification has the potential to

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<sup>1</sup> Civil Defence Emergency Management Act 2002.

negatively impact Orion infrastructure without the controls proposed and outlined in detail at **Appendix B**. In summary:

- 5.1 Orion supports recognition of SEDLs as a qualifying matter in PC14;
- 5.2 However, Orion also seeks protection of its lower voltage lines as there is risk that intensification will cause similar issues; and
- 5.3 Orion further seeks that PC14 include an electricity servicing standard to ensure infrastructure capacity requirements can be met.

### **RESOURCE MANAGEMENT (ENABLING HOUSING SUPPLY AND OTHER MATTERS) AMENDMENT ACT 2021**

#### **National Policy Statement on Urban Development**

6 The National Policy Statement on Urban Development (*NPS UD*) directs that local authority decisions on urban development are to be integrated with infrastructure planning decisions,<sup>2</sup> and that planning decisions contribute to well-functioning urban environments.<sup>3</sup>

7 A well-functioning urban environment is one in which:

- 7.1 Infrastructure is not adversely affected by incompatible activities; and
- 7.2 Urban growth is planned with infrastructure provisions in mind, recognising that the two run hand-in-hand.

8 While NPS UD Policy 3 directs councils to increase density and realise as much development capacity as possible in urban environments, Policy 4 allows district plans applying to tier 1 urban environments to modify the relevant building height or density requirements to the extent necessary to accommodate a qualifying matter.

#### **The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021**

9 The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (*Enabling Housing Act*) was introduced to speed up implementation of the NPS UD, whereby Councils are required to incorporate Medium Density Residential Standards (*MDRS*) into every relevant residential zone provided that the MDRS should be less enabling of development where a qualifying matter applies.<sup>4</sup>

10 The electricity distribution network is not listed in the NPS UD as “nationally significant infrastructure”. As such, the network as a whole (and various controls and restrictions that apply to development adjacent to it) does not fit within one of the pre-subscribed qualifying matters set out in s 77I of the RMA.

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<sup>2</sup> Objective 6.

<sup>3</sup> Policy 1.

<sup>4</sup> Resource Management Act 1991 (*RMA*), s 80F(1)(a).

- 11 However, the Council is able to identify as a qualifying matter “any other matter that makes higher density, as provided for by the MDRS or policy 3, inappropriate in an area” – if s 77L is satisfied.<sup>5</sup>
- 12 The electricity distribution network is identified in regional and district planning documents as regionally significant and strategically important infrastructure and there are relevant controls already protecting Orion’s assets in the Christchurch District Plan (*District Plan*).<sup>6</sup> Further, Orion is a lifeline utility and provides an essential service. It must be able to fulfil its function to the fullest possible extent, even though that may be at a reduced level, during and after an emergency.
- 13 The development enabled by MDRS is likely to result in a significant increase to electricity demand, while simultaneously limiting the area of land available for electricity distribution equipment and infrastructure. It is critical that intensification occurs with electricity infrastructure provision in mind, and PC14 must reflect this. Existing infrastructure must be protected from hazards and risks associated with inappropriate development, and sufficient land must be reserved for new infrastructure to service increased development.
- 14 Orion generally supports CCC’s implementation of the Enabling Housing Act in PC14. In particular, it supports recognition of *Electricity Distribution Corridors and Infrastructure* as a qualifying matter (the *SEDL QM*) in order to protect against reverse sensitivity effects and to ensure that it can build, operate, maintain and upgrade its infrastructure in a safe, efficient and effective manner. However, Orion considers refinement of the provisions as notified in PC14 are required as outlined at **Appendix B**.
- 15 Below we assess Orion’s infrastructure against relevant provisions of the Enabling Housing Act.
- Section 77J and Section 77L Enabling Housing Act – Corridor Protection for SEDLs**
- 16 Land use activities in proximity to Orion’s SEDLs have the potential to affect, and may be affected by, Orion’s electricity distribution operations. Sensitive land uses, such as residential activity in proximity to SEDLs, may expose people to safety hazards. Buildings, structures, fences and other obstacles can also impede Orion’s ability to safely and efficiently operate, maintain and upgrade the network.
- 17 The District Plan contains corridor protection buffers for SEDLS. Orion supports CCC’s inclusion of the SEDL QM in PC14 for reasons outlined below.

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<sup>5</sup> Resource Management Act 1991, s 77I(j): inserted by Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021, s 9.

<sup>6</sup> For example, Strategic Objective 3.3.12(b)(v) which directs that adverse effects on SEDLs are to be avoided. Also see Rule 14.5.1.5, Non-complying activities, NC3.

***Section 77J(3)(a) – Demonstrate why the area is subject to a qualifying matter and why the qualifying matter is incompatible with the level of development permitted by the MDRS***

- 18 The SEDLs subject to corridor protection buffers in the District Plan are shown on the planning maps. Spatially, the SEDL QM applies to the same land area covered by the SEDL corridor protection in the District Plan.
- 19 MDRS enables residential development up to 11m in height and at a minimum of 1.5 metres from the boundary. This is incompatible with Orion’s existing overhead infrastructure and electricity safety clearances from support structures and the centre line of conductors.
- 20 Residential setbacks within electricity distribution corridors are based on requirements in the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001). NZECP 34:2001 is an industry standard overseen by WorkSafe and which sets minimum safe electrical clearance requirements for structures, and certain activities, in relation to overhead electric line installations and support structures. NZECP 34:2001 states that the minimum safe distances have been set primarily to protect persons, property, vehicles and mobile plant from harm or damage from electrical hazards – including electric shock. It is vital that PC14 give effect to clearance distances as set out in the NZECP 34:2001, and the District Plan, as a matter of health and safety.
- 21 The location of lines subject to the existing electricity distribution corridors is fixed and unchanged, and the hazards associated with development near the lines exist irrespective of the Enabling Housing Act and MDRS. Because the location of the assets subject to the SEDL QM is unchanged, as is the risk of development near them, the area subject to the SEDL QM should also remain unchanged through the MDRS process. Orion supports PC14 as notified in this regard, as the planning maps reflect existing corridors as the SEDL QM.

***Section 77J(3)(b) – Assess the impact that limiting development capacity, building height, or density (as relevant) will have on the provision of development***

- 22 Electricity clearance distances are already required and prescribed in NZECP 34:2001. It is artificial to view inclusion or accommodation of corridor protection rules as “preventing” a level of development that would otherwise be enabled by the MDRS and Policy 3. While these restrictions (and modification of MDRS accordingly), would mean residential development beneath and immediately adjacent to existing SEDLs is heavily restricted from a resource consent perspective; NZECP 34:2001 would still apply in their absence.
- 23 In addition, it is not realistic to assume that every residentially zoned site will take up the opportunity to develop to the extent enabled through the MDRS. Many sites in residential zones have been recently re-developed and contain newly-built dwellings that are unlikely to be further modified to re-build in line with MDRS. Other sites may contain additional practical constraints which limit the opportunity to take up MDRS.



- 24 The way corridor protection provisions interact with a site is highly site-specific. The lines do not necessarily follow street lines or a particular orientation – meaning that depending on the site, they may pass over only a small portion or corner of a site (thus enabling development on the remainder of the site), while in other cases they may pass directly over a site (or anywhere in between these two extremes).
- 25 In reality, it is expected that both the number of sites actually affected by the SEDL QM, and the development capacity lost by its inclusion, is immaterial. This is especially so when considering what is already required in accordance with NZECP 34:2001.

***Section 77J(3)(c) – Assess the costs and broader impacts of imposing those limits***

- 26 As explained above, the costs on development capacity of including corridor protection setbacks in PC14 are negligible in light of NZECP 34:2001 and setbacks already contained in the District Plan.
- 27 Alternatively, the costs of not including the qualifying matter could be considerable:
- 27.1 Without clear restrictions on residential development within corridor protection setbacks, there is a risk that electricity clearance distances are compromised. This is first and foremost an electrical hazard and must be remediated immediately to keep people and property safe. Safety is non-negotiable for Orion.
- 27.2 The cost to remedy clearance breaches is considerable. Modifications can involve raising the lines or through the lateral relocation of the lines and poles or, in extreme cases, it may be necessary to underground the line. This can cost anywhere between \$20,000 - \$100,000 depending on the nature and extent of the breach, a cost ultimately borne by the landowner.
- 27.3 The remedial options available are also controlled by District Plan rules. For example, road reserves often support an array of infrastructure and there can be few options for new pole locations or additional underground electrical infrastructure.
- 28 In Orion’s experience, including the corridor protection rules explicitly in district plans assists in ensuring critical electricity safety clearances are actually considered and complied with in practice. Requirements of NZECP 34:2001 can be, and often are, missed in this process. Highlighting and specifically incorporating and retaining the requirements of NZECP 34:2001 in PC14 will improve safety to the public, remove cost associated with remediation and promote good electricity network outcomes.
- 29 There is a clear benefit to recognising safe clearance distances as a qualifying matter in PC14. It presents a clear signal to plan users and would significantly reduce the likelihood of clearances being overlooked and compromised by incompatible development.

**Section 77J(4)(b) – how modifications to the MDRS as applied to relevant residential zones are limited to only those modifications necessary to accommodate qualifying matters and, in particular, how they apply to any spatial layers relating to overlays, precincts, specific controls, and development areas**

- 30 Residential development is inappropriate within SEDL protection corridors as a matter of health and safety. Specific amendments to MDRS requiring setbacks from electricity support structures and the centre line of conductors proposed within the SEDL QM area are provided in **Appendix B**. The modifications proposed are only those necessary to accommodate the SEDL QM.

**Section 77L(a) – Identify the specific characteristic that makes the level of development provided by the MDRS (as specified in Schedule 3A or as provided for by policy 3) inappropriate in the area**

- 31 In the vast majority of cases, virtually any new or expanded residential development within an electricity distribution corridor is inappropriate.
- 32 By contrast, the MDRS provide a framework whereby residential development is permitted, provided certain standards are met.<sup>7</sup> There is no one particular standard (or characteristic) in Schedule 3A which makes the application of the MDRS to corridors inappropriate. Rather, it is the enablement of residential development per se given any dwelling risks electricity clearances and can prevent or hinder access to lines and associated support structures. Thus, the MDRS proceeds on an assumption that is contrary to the starting point that applies to electricity distribution infrastructure.
- 33 Of all the characteristics specified in Schedule 3A, building height could be the most problematic (or inappropriate) in terms of SEDLs. That said, while the building height limits in the MDRS (up to 11m in height) are inappropriate within corridors, far lower height limits, of say five or six metres, are also incompatible with SEDLs, given lines heights, clearances and access requirements.

**Section 77L(b) – Justify why that characteristic makes that level of development inappropriate in light of the significance of urban development and the objectives of the NPS-UD**

- 34 Objective 1 of the NPS UD is focused on “well-functioning urban environments... that enable... social, economic and cultural wellbeing...and...health and safety, now and into the future”. Accommodating the existing corridor protection provisions as a qualifying matter is entirely consistent with this objective. In particular, the corridors enable and facilitate the distribution of electricity, which is critical for social and economic wellbeing, and they are specifically designed to keep persons, property, vehicles and mobile plant safe from electrical hazards.
- 35 Objective 6 of the NPS UD is also particularly pertinent in this context. Electricity network planning and development decisions are made based on scenarios that span many decades, with individual network assets often having a service life exceeding 40 or 50 years. Limiting residential development via the corridor protection provisions and SEDL QM integrates local authority decision making with

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<sup>7</sup> Enabling Housing Act, Schedule 3A CI 2(1).

infrastructure planning and funding decisions as it gives some certainty around residential development adjacent to critical network assets and infrastructure.

**Section 77L(c) – Site-specific analysis**

36 The SEDL QM relates to all sites that are within the corridor protection buffers for all existing 66kV and 33kV within Christchurch City.

37 It is not realistic to evaluate each site impacted by the corridor protection buffers to determine whether some development beneath the lines may be possible. Such an assessment requires detailed engineering analysis which takes into account a number of factors.

38 However, this is not detrimental to the identification of the qualifying matter. The geographic area where intensification needs to be compatible is readily identifiable on the District Plan maps.

**Clearances around 11kV and Low Voltage Lines**

39 The clearances associated with SEDLs (generally 33kV and 66kV lines) are addressed above in the context of the SEDL QM. However, it is also vital that the smaller clearances associated with lower voltage lines are also addressed as part of PC14.

40 Increased building height limits and smaller boundary setbacks enabled by the MDRS also have the potential to cause significant issues for large parts of Orion's existing 11kV, 400V and 230V network. These voltages are generally the most common on any electricity distribution network and – broadly speaking – are the vast majority of lines that are seen in any given residential street.

41 As noted above, NZECP34:2001 is an industry standard overseen by WorkSafe that sets minimum safe electrical clearance requirements for structures and certain activities in relation to overhead electric line installations and support structures. NZECP 34:2001 prescribes that certain clearances must be met in relation to 230V, 400V and 11kV lines.

42 Encroachment on clearances can threaten the safe, secure and reliable supply of electricity because:

42.1 It increases safety risks to people and property. If an electrical fault occurs, having buildings and certain activities near overhead lines has the potential to cause significant harm or death.

42.2 It increases risks to infrastructure assets from third party activity and can compromise Orion's ability to operate, repair, maintain and upgrade this infrastructure which adds significantly to costs and duration of works.

42.3 It can impact on the reliability of electrical supply as repair, maintenance and upgrading can be delayed and / or take longer.

43 While existing development already presents challenges to the location of electricity infrastructure and protection of lines clearances, the scale and density of

intensification associated with the MDRS (which enables construction of taller buildings in closer proximity to boundaries) will see these challenges increase significantly in prevalence and severity.

- 43.1 If higher buildings are permitted, this may compromise safe clearance distances as new or larger residential buildings encroach on existing overhead lines.
- 43.2 Where overhead lines run along road frontages, higher buildings on private land close to the boundary may also compromise clearance distances.
- 43.3 Where overhead lines run down a right of way, intensification may bring new buildings close to these lines and compromise clearances.
- 44 Recognition of clearances for 11kV, 400V and 250V lines as part of PC14 would significantly reduce the likelihood of clearances being overlooked and ultimately compromised by residential development. It is important to remember that clearances are first and foremost about keeping people and property safe around electrical hazards.
- 45 At Appendix B, Orion proposes an additional standard in PC14 to address clearances around these lower voltage lines. It also proposes an appropriate consenting pathway for development that does not meet these clearances, acknowledging that in some cases an overhead lines clearance assessment by a suitably qualified engineer may confirm it is safe and appropriate for smaller clearances to apply.
- 46 The costs of imposing Orion's proposed clearance limits in PC14 are negligible given compliance must already be achieved under NZECP 34:2001. On the other hand, there are significant benefits to the protection of clearances as a related matter whereby electricity supply is protected and enabled, and safety is promoted.

#### **Related Provisions for Electricity Equipment and Lines Protection**

- 47 The issues of residential development failing to properly integrate with associated network servicing requirements, and challenges with locating the necessary infrastructure to service medium and high-density residential development is an issue that does not strictly fall into the category of a qualifying matter but is integral to the successful update and delivery of the MDRS.
- 48 Servicing capacity is therefore a matter which CCC should consider in tandem. Section 80E(1)(b)(iii) of the Enabling Housing Act provides for the inclusion of "related provisions" (including objectives, policies, and rules) that support or are consequential on the MDRS. Among other things, "related provisions" may relate to infrastructure.<sup>8</sup>

#### **Ground Mounted Electricity Equipment**

- 49 The electricity distribution network can be upgraded to service new dwellings and greater intensification, provided that intensification and development takes into

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<sup>8</sup> Resource management (Enabling Housing Supply and Other Matters) Amendment Act 2021 s 80E(2)(d).

account the need for upgraded infrastructure. Intensification (and the resulting increased demand for electricity) generally results in a need for upgraded / reinforced overhead electricity lines and / or underground cables, and larger or an increased number of ground mounted equipment such as electricity distribution kiosks, cabinets and distribution boxes.

- 50 When sites are developed (or redeveloped) via intensification, it is critical that the electricity network is considered, and sufficient land is reserved for electricity distribution infrastructure.
- 50.1 There is a functional need for electricity distribution infrastructure to be located on, or immediately adjacent to, sites that the infrastructure services. Lines and cables must connect to the site in order to provide electricity. Kiosks, cabinets and distribution substations must be located around the electricity network in accordance with the demand for electricity. This equipment cannot perform its function if it is situated away from the location of electricity demand.
- 50.2 The size and footprint requirements of this infrastructure are often fixed and inflexible (and are directly related to the electricity demand in the immediate area). In addition, various safety and electrical standards set clearances around ground mounted equipment. Neither the equipment, nor the standards, can be amended or resized to "fit" the equipment within the space available. There is often very little opportunity to compromise on the land area required for electricity distribution infrastructure.
- 50.3 Sourcing alternative locations for electrical infrastructure (i.e. other than on or immediately adjacent to the site which the infrastructure services) is also problematic:
- (a) Locating infrastructure in berms or road corridors exposes equipment to vehicular traffic, clashes with existing underground infrastructure, can have adverse visual impacts on streetscape, and is generally resisted by corridor managers (e.g. Council or Waka Kotahi).
  - (b) Locating above ground infrastructure equipment in road reserves and parks is generally opposed by Council and / or Local Boards.
  - (c) Owners of adjacent sites that have sufficient land to accommodate infrastructure should not be required to accommodate it simply because development on an adjacent site requires it (and in the vast majority of cases they will not accept it on their land).
- 51 Where infill development restricts infrastructure corridors and/or individual sites and road corridors do not adequately account for the provision of infrastructure, providing a secure and reliable electricity supply to new developments can become problematic.
- 52 Infill housing and intensification is already presenting significant challenges for the location, operation, maintenance and upgrading of electricity distribution equipment

and infrastructure. Orion's experience is that in some cases developers do not approach Orion to discuss servicing matters until after plans for a development are fixed, and often after resource consent has been granted. Developers often fail to include (or set aside) sufficient space on site for the necessary infrastructure. Similarly, Orion encounters resistance from corridor managers and Council when seeking to locate new / upgraded infrastructure in the berm or local reserve.

- 53 Development enabled by the MDRS is likely to exacerbate existing issues unless appropriately managed through PC14. Ultimately, it enables more development, while making it more difficult for infrastructure providers to supply that development with critical infrastructure.
- 54 Orion seeks that PC14 contain an electricity servicing standard as outlined in Appendix B. The land area required for onsite electricity servicing is highly site specific. However, Orion has proposed a 5.5m<sup>2</sup> land area to balance the size of equipment most frequently required against the ability of landowners and developers to plan for development of their sites. Not all sites will need this space set aside, however it is important that Orion is able to consider whether it is necessary on a site-specific basis and to work with developers at an early stage. The flexibility provided with Orion's proposed relief is an efficient and effective means of ensuring infrastructure capacity requirements are met while not unduly limiting development.
- 55 Ultimately, through engagement between Orion and the developer, it may be possible that the required area is reduced and/or it may be moved away from the front boundary. Orion's proposed relief is intended to create meaningful engagement between developers and Orion early on, when intensification is in initial planning stages. In Orion's experience, early engagement is highly beneficial to all involved, as it reduces the risk of site design needing to be amended and the risk of poor infrastructure outcomes.

## **CONCLUSION**

- 56 Orion supports recognition of the SEDL QM in PC14 but seeks refinement of provisions implementing corridor protection setbacks. In addition, Orion seeks the addition of setback requirements for lower voltage lines and provision for electricity servicing.

## APPENDIX B

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

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

Suggested amendments and alternative drafting is shown in track change – Orion’s requested deletions are shown using ~~red strikethrough~~ and requested insertions shown using red underline.

No.	Provision	Position	Relief requested	Explanation
1	<p>New Rule to be inserted into following zones:</p> <ul style="list-style-type: none"> <li>• MDRS</li> <li>• Residential suburban and Residential Suburban Transition zone</li> <li>• High Density Residential zone</li> <li>• Residential Hills zone</li> <li>• Future Urban zone</li> </ul>		<p>Insert a new rule for provision of electricity equipment and infrastructure as follows:</p> <p><b><u>Activity</u></b></p> <p><u>PX The establishment of a new, or expansion of an existing sensitive activity.</u></p> <p><b><u>Activity specific standards</u></b></p> <p>a. <u>Either a land area of at least 5.5m<sup>2</sup> is provided at the boundary closest to the road reserve for electricity equipment and infrastructure, or confirmation is provided from Orion New Zealand Limited that it is not required.</u></p> <p><b><u>14.5.1.4 Discretionary activities</u></b></p>	<p>Orion seeks a new rule be inserted to the listed zones to include an electricity servicing standard. Orion’s experience is that in some cases developers do not approach Orion to discuss servicing matters until after the plans for a development are fixed, and often a resource consent has been granted. Consequently, developers often fail to set aside or include sufficient space on site for the necessary infrastructure. Similarly, Orion encounters resistance from corridor managers and Council when seeking to locate new/upgraded infrastructure within the berm or a local reserve. These existing issues are likely to be exacerbated by PC14.</p>

			<p><b>Activity</b></p> <p><b>DX</b></p> <p>a. <u>Any activity that does not meet the activity specific standard under PX.</u></p> <p>b. <u>Any application arising from this rule shall not be publicly notified and shall be limited notified only to Orion New Zealand Limited (absent its written approval).</u></p>	<p>The land area required for on-site electricity servicing is highly site specific however Orion has proposed a 4m<sup>2</sup> land area. This standard is proposed to ensure that there is engagement with developers at the initial planning stages of land use intensification.</p>
2	General – qualifying matter for Electricity Transmission and <u>Distribution</u> Corridors and Infrastructure	Support in part.	<p>Support identification of a qualifying matter for <i>Electricity Transmission Corridor and Infrastructure subject to the following amendments:</i></p> <p>General – qualifying matter for Electricity Transmission and Distribution Corridors and Infrastructure.</p>	<p>Orion generally support the approach to retain the existing operative District Plan zones and provisions in areas covered by the proposed <i>Electricity Transmission Corridor and Infrastructure</i> qualifying matter. However, Orion considers adjustments are required to specifically reference electricity distribution.</p>
3	Planning Maps – the Spatial Extent of the Qualifying Matter	Support	<p>Retain the operative District Plan provisions within the SEDL QM rather than activity standards associated with MDRS.</p>	<p>Orion supports the spatial extent of the SEDL QM as it exists in the operative District Plan. Orion notes it is not practical to map the lower voltage lines that are sought to be included as a QM under submission point X below.</p> <p>However, Orion also seeks that the 11kV, 400V and 230V network are</p>



				also included. These lower voltage lines are the most common within any distribution network and comprise the majority of lines that are seen in any residential street. The increased building height limits and smaller boundary setbacks enabled by the MDRS have the potential to cause significant issues for large parts of this lower voltage network.
<b>Chapter 3 – Strategic Directions</b>				
4	Objective 3.3.13 Objective - Infrastructure	Support in Part	Amend existing Objective 3.3.13 Objective – Infrastructure as follows:  ...  <a href="#"><u>vi. managing activities to avoid adverse effects on the 11kV, 400V and 230V electricity distribution network.</u></a>	Orion considers that an amendment is required to recognise the need to protect and provide for infrastructure such as the lower voltage significant electricity distribution network,
5	Chapter 6.1A Qualifying Matters Table 1  Chapter 14 Residential	Support.		Orion supports identification of <i>Electricity Transmission Corridor and Infrastructure</i> as a qualifying matter in PC14.
6	Chapter 6.1A Qualifying Matters Table 1  Chapter 15 Commercial	Support.		Orion supports identification of Electricity Transmission and Distribution Corridors as a qualifying matter in PC14.

Chapter 14 - Residential				
7	Policy 14.2.3.2	Support.	Retain as notified.	Orion supports this policy as notified. PC14 includes Electricity Transmission Corridors and Infrastructure as a qualifying matter. It is appropriate to recognise that MDRS apply in all relevant residential zones except in circumstances where a qualifying matter applies.
8	Medium Density Residential Zone	Support with amendment.	<p>Add an additional clause to NC2 and amend clause 'c' as follows:</p> <p><u>iv within 3m of the outside overhead conductor of any 11kV, 400V or 230V electricity distribution line.</u></p> <p>d. <u>Conductive F</u>fences within 5 metres of a 66kV or, 33kV, <u>11kv, 400V or 230V</u> electricity distribution line support structure foundation.</p>	Orion supports this rule but seeks a new clause to provide setback clearances for 11kV, 400V and 230V network. These lower voltage lines are the most common within any distribution network and comprise the majority of lines that are seen in any residential street. The increased building height limits and smaller boundary setbacks enabled by the MDRS have the potential to cause significant issues for large parts of this lower voltage network.
9	Residential Suburban Zone and Residential Suburban Density Transition Zone  Rule 14.4.1.5	Support with amendment.	<p>Add an additional clause to NC7 and amend clause 'c'. as follows:</p> <p><u>iiii within 3m of the outside overhead conductor of any 11kV, 400V or 230V electricity distribution line.</u></p>	Orion supports this rule but seeks a new clause to provide setback clearances for 11kV, 400V and 230V network. These lower voltage lines are the most common within any distribution network and comprise the majority of lines that are seen in any residential street. The increased

			<p>b. <u>Conductive Fences</u> within 5 metres of a 66kV ø, 33kV, <u>11kv, 400V or 230V</u> electricity distribution line support structure foundation.</p>	<p>building height limits and smaller boundary setbacks enabled by the MDRS have the potential to cause significant issues for large parts of this lower voltage network.</p>
10	<p>Residential Hills Zone</p> <p>Rule 14.7.1.5 non-complying activities NC2</p>		<p>Add an additional clause to NC2 a. and amend clause 'b' as follows:</p> <p><u>iii within 3m of the outside overhead conductor of any 11kV, 400V or 230V electricity distribution line.</u></p> <p>b. <u>Conductive Fences</u> within 5 metres of a 66kV ø, 33kV, <u>11kv, 400V or 230V</u> electricity distribution line support structure foundation.</p>	<p>Orion proposes a new clause to provide setback clearances for the 11kV, 400V and 230V network. These lower voltage lines are the most common within any distribution network and comprise the majority of the lines that are seen in any residential street. The increased buildings height limits and smaller boundary setbacks enabled by the MDRS have the potential to cause significant issues for large parts of the lower voltage network.</p>
11	<p>Future Urban Zone</p> <p>Rule 14.12.1.5 Non-complying activities NC2</p>	<p>Support with amendment</p>	<p>Add an additional clause to NC2 a. and amend clause 'b' as follows:</p> <p><u>iv within 3m of the outside overhead conductor of any 11kV, 400V or 230V electricity distribution line.</u></p> <p>b. <u>Conductive Fences</u> within 5 metres of a 66kV ø, 33kV, <u>11kv, 400V or 230V</u> electricity distribution line support structure foundation.</p>	<p>Orion proposes a new clause to provide setback clearances for the 11kV, 400V and 230V network. These lower voltage lines are the most common within any distribution network and comprise the majority of the lines that are seen in any residential street. The increased buildings height limits and smaller boundary setbacks enabled by the MDRS have the potential to cause</p>

				significant issues for large parts of the lower voltage network.
<b>Chapter 15 Commercial</b>				
12	Town Centre Zone  Rule 15.4.1.5 Non-complying activities	Support with amendment	Add an additional clause to NC3 a. and amend clause 'd' as follows:  <u>iii within 3m of the outside overhead conductor of any 11kV, 400V or 230V electricity distribution line.</u>  d. <u>Conductive F</u> fences within 5 metres of a National Grid transmission line support structure foundation, 66kV or, 33kV, <u>11kv, 400V or 230V</u> electricity distribution line support structure foundation.	Orion proposes a new clause to provide setback clearances for the 11kV, 400V and 230V network. These lower voltage lines are the most common within any distribution network and comprise the majority of the lines that are seen in any residential street. The increased buildings height limits and smaller boundary setbacks enabled by the MDRS have the potential to cause significant issues for large parts of the lower voltage network.
13	Local Centre Zone  Rule 15.5.1.5	Support with amendment	Add an additional clause to NC3 a. and amend clause 'd' as follows:  <u>iii within 3m of the outside overhead conductor of any 11kV, 400V or 230V electricity distribution line.</u>  d. <u>Conductive F</u> fences within 5 metres of a National Grid transmission line support structure foundation, 66kV or, 33kV, <u>11kv, 400V or 230V</u> electricity distribution line support structure foundation.	Orion proposes a new clause to provide setback clearances for the 11kV, 400V and 230V network. These lower voltage lines are the most common within any distribution network and comprise the majority of the lines that are seen in any residential street. The increased buildings height limits and smaller boundary setbacks enabled by the MDRS have the potential to cause significant issues for large parts of the lower voltage network.

14	Neighbourhood Centre Zone  Rule 15.6.1.5 Non-complying activities.	Proposed amendment	Add an additional clause to NC3 a. and amend clause 'd' as follows:  <u>iii within 3m of the outside overhead conductor of any 11kV, 400V or 230V electricity distribution line.</u>  d. <u>Conductive F</u> fences within 5 metres of a National Grid transmission line support structure foundation, 66kV <del>or</del> , 33kV, <u>11kv, 400V or 230V</u> electricity distribution line support structure foundation.	Orion proposes a new clause to provide setback clearances for the 11kV, 400V and 230V network. These lower voltage lines are the most common within any distribution network and comprise the majority of the lines that are seen in any residential street. The increased buildings height limits and smaller boundary setbacks enabled by the MDRS have the potential to cause significant issues for large parts of the lower voltage network.
15	Mixed Use Zone  Rule 15.10.1.5 Non-complying activities	Proposed amendment	Add an additional clause to NC2 and amend clause 'c' as follows:  <u>X Sensitive activities within 3m of the outside overhead conductor of any 11kV, 400V or 230V electricity distribution line.</u>  d. <u>Conductive F</u> fences within 5 metres of a 66kV <del>or</del> , <u>33kV, 11kv, 400V or 230V</u> electricity distribution line support structure foundation.	Orion proposes a new clause to provide setback clearances for the 11kV, 400V and 230V network. These lower voltage lines are the most common within any distribution network and comprise the majority of the lines that are seen in any residential street. The increased buildings height limits and smaller boundary setbacks enabled by the MDRS have the potential to cause significant issues for large parts of the lower voltage network.
<b>Chapter 16 Industrial Zones</b>				
16	Industrial General Zone	Proposed amendment	Add an additional clauses to 'NC1' and amend clause 'd' as follows:	Orion proposes a new clause to provide setback clearances for the 11kV, 400V and 230V network. These

	Rule 16.4.1.5 on-complying activities		<p><u>X Sensitive activities within 3m of the outside overhead conductor of any 11kV, 400V or 230V electricity distribution line.</u></p> <p>d. <u>Conductive</u> Fences within 5 metres of a 66kV National Grid transmission line support structure foundation or 5 metres of a 66kV <del>electricity distribution support structure foundation or</del>, <u>33kV, 11kv, 400V or 230V</u> electricity distribution line support structure foundation.</p>	lower voltage lines are the most common within any distribution network and comprise the majority of the lines that are seen in any residential street. The increased buildings height limits and smaller boundary setbacks enabled by the MDRS have the potential to cause significant issues for large parts of the lower voltage network.
17	Industrial Park Zone Rule 16.6.1.5	Proposed amendment	<p>Add an additional clause to 'NC3' and amend clause 'd' as follows:</p> <p><u>X Sensitive activities within 3m of the outside overhead conductor of any 11kV, 400V or 230V electricity distribution line.</u></p> <p>d. <u>Conductive</u> Fences within 5 metres of a 66kV <del>electricity distribution support structure foundation or</del>, <u>33kV, 11kv, 400V or 230V</u> electricity distribution line support structure foundation.</p>	Orion proposes a new clause to provide setback clearances for the 11kV, 400V and 230V network. These lower voltage lines are the most common within any distribution network and comprise the majority of the lines that are seen in any residential street. The increased buildings height limits and smaller boundary setbacks enabled by the MDRS have the potential to cause significant issues for large parts of the lower voltage network.

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

**Submission Date:** 12/05/2023  
**First name:** Mark **Last name:** Arbuthnot  
**Organisation:** Lendlease Limited

**On behalf of:**

**Preferred method of contact** Email

**Postal address:** PO Box 4492

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:** 1140

**Email:** marbuthnot@bentley.co.nz

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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

Lendlease - Proposed Plan Change 14 submission Final

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

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

Name of submitter: Lendlease New Zealand Limited (“**Lendlease**”)

- 1.1 This is a submission on a change proposed to the following proposed plan (the **proposal**):
- Proposed Housing and Business Choice Plan Change (“**PC14**”) to the Christchurch District Plan.
- 1.2 Lendlease could not gain an advantage in trade competition through this submission.
- 1.3 Lendlease’s submission relates to PC14 in its entirety, but in particular:
- The proposed Town Centre zoning of Hornby.
  - The amendments to Chapter 15 (Commercial) that relate to giving effect to Policy 3 of the National Policy Statement for Urban Development (“**NPS-UD**”).

**Background**

- 1.4 Lendlease owns and operates the Dress Smart Mall located at 411 Main South Road and 6 & 12 Shands Road, Hornby. The Dress Smart Mall comprises a gross leasable floor area of over 7,000m<sup>2</sup> of outlet retail activity on a 1.2ha site.
- 1.5 Hornby commercial centre has an area of approximately 13.3ha and is occupied by 87,800m<sup>2</sup> of commercial floor space, of which 70,800m<sup>2</sup> is in retail use. Its two shopping centres (The Hub and Dress Smart) have a combined gross floor area of approximately 27,000m<sup>2</sup> and attract visitors from all over Christchurch and the surrounding districts, making it a significant commercial hub in the region.
- 1.6 Hornby is located at the intersection of several major transport routes, including the Southwestern Motorway and Main South Road. Waka Kotahi’s commuter information (based on the 2018 Census dataset) confirms that 5,949 people travel to Hornby Central for work or school. People travel to Hornby from 190 different areas, including from within the sub-region (Rolleston, Prebbleton, and Lincoln, and to a lesser extent, Darfield, Southbridge, Kaiapoi and Woodend).
- 1.7 Its location therefore enables it to serve the greater Christchurch area.
- 1.8 The area is also serviced by the soon to be completed Matatiki: Hornby Centre (a \$40M community facility that includes, a library, swimming pool, hydrotherapy pool, customer services, and multi-purpose rooms) and is the home of the Denton Park Velodrome; one of only two velodromes in the South Island, and has hosted numerous national and international cycling events, including the New Zealand National Track Cycling Championships and the Oceania Track Cycling Championships.



- 1.9 Hornby therefore functions as a metropolitan centre, being a key destination for a large catchment area that extends beyond its immediate and adjoining suburbs. It is a focal point for the surrounding sub-regional urban catchment, and with more than 12,000 new homes expected in Christchurch’s south-west by 2044, it has the potential to become a more prominent metropolitan centre in the future.

### **Submission**

- 1.10 Lendlease generally supports the proposal, subject to the amendments set out below and within the attached Schedule 1 and Schedule 2.
- 1.11 Hornby currently functions as a metropolitan centre, providing a focal point for the surrounding sub-regional urban catchment and servicing the needs of more than the immediate and adjoining suburbs. To achieve a well-functioning urban environment, any rezoning decisions in respect of Hornby must recognise the metropolitan/sub-regional status of the centre, rather than seeking to limit it to a town centre status.
- 1.12 Lendlease’s submission seeks to ensure that the proposal appropriately recognises and provides for the sub-regional urban catchment of Hornby and is enabling of metropolitan levels of development.
- 1.13 While not specifically addressed within this submission, some other large Town Centres, such as Riccarton and Papanui, may also meet the status of a Metropolitan Centre and should be zoned accordingly.

### Rezoning of Hornby Commercial Core Zone to Town Centre Zone

- 1.14 The National Planning Standards 2019 (“NPS”) describes the Town Centre Zone as:<sup>1</sup>

Areas used predominantly for:

- in smaller urban areas, a range of commercial, community, recreational and residential activities.
- in larger urban areas, a range of commercial, community and recreational and residential activities that service the needs of the immediate and neighbouring suburbs.

- 1.15 Whereas the NPS describes the Metropolitan Centre Zone as:<sup>2</sup>

Areas used for predominantly for a broad range of commercial, community, recreational and residential activities. The zone is a focal point for sub-regional urban catchments.

- 1.16 The proposal seeks to rezone the “Hornby Commercial Core Zone” to “Town Centre Zone” and increase the maximum permitted height limit from 20m to 22m *“to reflect the increased level of commercial activities and community services in these centres in comparison to other centres”*.<sup>3</sup>

<sup>1</sup> Pg.37; Chapter 8. Zone Framework Standard; National Planning Standards; November 2019.

<sup>2</sup> Ibid.

<sup>3</sup> Pg.41; Commercial and Industrial Sub-Chapters Evaluation Report.

- 1.17 Hornby (and district centres of Riccarton and Papanui) is more than twice the size of the other town centres at Linwood, Belfast, Shirley and North Halswell. Unlike these other town centres, Hornby has been assessed by the proposal to be of sufficient size to draw significant trade from adjoining districts (around 20%) and having more than 50% of its retail spend from outside a 5km catchment,<sup>4</sup> and draws people from within the sub-region for work.
- 1.18 Despite this, Hornby has not been provided with a “Metropolitan Centre Zone”.
- 1.19 The proposal advises that the most appropriate approach is to not identify any metropolitan centres, based on the actual current range of activities (commercial, community, residential and recreational) within the centre zones.<sup>5</sup> Although, it does recognise that in the long term, as matters such as Mass Rapid Transit and the regional Spatial Plan are developed, “...it may be appropriate to reassess the context for some centres (likely... Hornby...) and potentially make the case for these centres being defined as Metropolitan centres”.<sup>6</sup>
- 1.20 The proposal did consider whether Hornby should be identified as a metropolitan centre based on its large retail floor space and wider employment base compared to other town and neighbourhood centres. However, it concluded that it did not satisfactorily meet the sub-regional catchment in relation to existing community or recreational facilities.<sup>7</sup>
- 1.21 Given that the purpose of the Town Centre Zone is limited to serving both immediate and neighbouring suburbs (as opposed to a sub-regional catchment), the proposal represents a significant constraint on the function and future growth of the Hornby commercial area.
- 1.22 While the proposal raises concern in respect of the current level of commercial activity, this does not derogate from the fact that Hornby already services a large sub-regional urban catchment, which will continue to grow in the future. Enabling metropolitan levels of growth within the centre will assist with the further diversification of the commercial offering within the centre. As acknowledged by the Economic Cost Benefit Analysis that supports the proposal:<sup>8</sup>

The proposed height-increase options considered, 32m or 50m, may encourage additional employment as the area is (re)developed to greater scale. The increase in heights enables more intense commercial office employment (i.e., more floors → more offices → more employees) and any investment in the built form or increase in foot traffic of the area will encourage further retail activity and employment.

- 1.23 Turning to recreational facilities, Denton Park is a regionally significant recreational facility that is more than of local significance. Zoned “Open Space Metropolitan Facilities”, it is intended to “...accommodate public and private major sports

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<sup>4</sup> Para. 4.3.24; Section 32: Commercial Appendix 2 Approach to Alignment with National Planning Standards.

<sup>5</sup> Ibid.

<sup>6</sup> Para. 4.3.25; Ibid.

<sup>7</sup> Para. 4.3.26; Ibid.

<sup>8</sup> Pg.44; Christchurch Central City and Suburban Centres (PC14) Economic Cost Benefit Analysis; Property Economics; July 2022.

*facilities, larger recreation facilities” on sites that provide “Capacity for multifunctional use, co-location of complementary or compatible activities and for hosting city, regional, national and international events which provide entertainment to residents and visitors”.*<sup>9</sup>

- 1.24 Major sports facilities, community activities and facilities, accessory conference and function facilities, and accessory visitor accommodation (to name but a few) are all provided for as a permitted activity within the Open Space Metropolitan Facilities zone. Plainly, the District Plan provides the necessary framework to enable the future development of community and recreational facilities within Hornby to support future metropolitan levels of growth.
- 1.25 Further, while not necessarily of sub-regional significance, Hornby will be supported by civic and community facilities through the new Matatiki: Hornby Centre.
- 1.26 The most appropriate method to enable Hornby’s future growth, including a commensurate level of commercial activity and community and recreational services, is through the intensification and diversification opportunities delivered through the application of the Metropolitan Centre Zone to the Hornby Commercial Core.
- 1.27 Lendlease therefore seeks that the proposal rezones the Hornby “Commercial Core Zone” to “Metropolitan Centre Zone”.
- 1.28 Up-zoning to the “Metropolitan Centre Zone” will also require Council to undertake an assessment of intensification within its walkable catchment as required by Policy 3(c) of the National Policy Statement in Urban Development 2020 (“NPS-UD”).
- 1.29 Consequential changes to the proposal have been identified as being necessary to incorporate the “Metropolitan Centre Zone” into the proposal, this may also include zoning other town centres to metropolitan centre.
- 1.30 The changes to address Lendlease’s concerns are contained in Schedule 1 and Schedule 2.
- 1.31 In addition to the specific reasons above, Lendlease considers that applying a new Metropolitan Centre Zone to Hornby:
- (a) will give effect to the objectives and policies of the NPS-UD;
  - (b) will contribute to well-functioning urban environments;
  - (c) is consistent with the sustainable management of physical resources and the purpose and principles of the Resource Management Act 1991 (“RMA”);
  - (d) will meet the requirements to satisfy the criteria of section 32 of the RMA;
  - (e) will meet the reasonably foreseeable needs of future generations; and
  - (f) is consistent with sound resource management practice.

### **Decision Sought**

- 1.32 Lendlease seeks the following decision from the local authority:

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<sup>9</sup> Table 18.2.2.1; Christchurch District Plan.

- (a) That the proposal be amended as set out within Schedule 1 and Schedule 2 of this submission.
  - (b) In the alternative, amend the provisions of the Town Centre Zone to provide for greater intensification within that zone, or specifically to the Hornby Town Centre Zone consistent with the provisions sought for the new Metropolitan Centre Zone.
  - (c) Such further or other consequential relief as may be necessary to fully give effect to the relief sought in this submission.
- 1.33 Lendlease wishes to be heard in support of this submission.
- 1.34 If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.

Dated 12 May 2023

**Signature** by its planning and resource management consultants and authorised agents Bentley & Co. Ltd.



Mark Arbuthnot

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**Schedule 1**


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Detailed submissions and  
relief sought

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### Schedule 1: Detailed submissions and relief sought

Relief sought by the submitter is shown in ~~strike through~~ and underline

	Provision	Submission	Relief Sought
	Planning Maps		
1.	Town Centre Zone, Hornby	<p>Oppose.</p> <p>For the reasons discussed within the submission, Lendlease is opposed to the rezoning of the Hornby Commercial Core Zone to Town Centre Zone.</p> <p>Hornby services a sub-regional urban catchment, drawing significant trade from adjoining districts and having a more than 50% of its retail spend from outside a 5km catchment. Waka Kotahi’s commuter information confirms that nearly 6,000 people travel to Hornby for work or school from 190 different areas, including from within the sub-region.</p> <p>It is also serviced by a regionally significant recreational facility, which is zoned “Open Space Metropolitan Facilities” and provides the necessary framework to enable the future development of community and recreational facilities within Hornby to support its future growth.</p> <p>The most appropriate method to recognise Hornby’s existing role and function and enable Hornby’s future growth, including a commensurate level of commercial activity and community and recreational services, is through the intensification and diversification opportunities delivered through the rezoning of the Town Centre Zone at Hornby to Metropolitan Centre Zone.</p>	<p>Rezone the Town Centre Zone to Metropolitan Centre Zone, as it relates to Hornby, as follows:</p> 
2.	Hornby Walkable Catchment	<p>Up-zoning to the Metropolitan Centre Zone will also require Council to undertake an assessment of intensification within a walkable catchment of the</p>	<p>Undertake an assessment of intensification within a walkable catchment of Hornby Metropolitan Centre and</p>

**Schedule 1: Detailed submissions and relief sought**

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	<b>Provision</b>	<b>Submission</b>	<b>Relief Sought</b>
		Metropolitan Centre zone as required by Policy 3(c) of the NPS-UD.  Building heights of at least 6 storeys are required within at least a walkable catchment of the edge of Metropolitan Centre Zones and the provisions applying to the surrounding commercial and residential zoning needs to be adjusted	enable building heights of at least 6 storeys within that area.
3.	Other Town Centre Zones	For similar reasons discussed within this submission, some other large Town Centres, such as Riccarton and Papanui, may also meet the status of a Metropolitan Centre and should be zoned accordingly.	Review the extent of the Town Centre Zone to determine whether the larger centres should be rezoned Metropolitan Centre Zone.
Chapter 1 Introduction			
4.	1.3.4.2 Long Term Plan, the 3 Year Plan and Annual Plan	Support	Retain changes to 1.3.4.2 as notified.
Chapter 2 Abbreviations and Definitions			
5.	Whole Chapter	Except where specified below, Lendlease supports the amendments proposed to Chapter 2, as notified.	Retain Chapter 2 as notified, except where specified below.
6.	Commercial Centre	Support in part.  Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. A consequential change is required to the definition of “Commercial Centre” to include reference to the “Metropolitan Centre Zone”.	Amend the definition of “Commercial Centre” to include reference to the “Metropolitan Centre Zone”, as follows:  Commercial Centre means the city centre, <u>metropolitan centres</u> , town centres, local centres, neighbourhood centres and large format centres zoned City Centre, <u>Metropolitan Centre</u> , Town Centre, Local Centre, Neighbourhood Centre, Commercial Banks Peninsula and Large Format Retail zone.

**Schedule 1: Detailed submissions and relief sought**

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	<b>Provision</b>	<b>Submission</b>	<b>Relief Sought</b>
7.	Commercial Zones	<p>Support in part.</p> <p>For the reasons discussed at item 6, above, as consequential change is required to the definition of “Commercial Zones” to include reference to the “Metropolitan Centre Zone”.</p>	<p>Amend the definition of “Commercial Zones” to include reference to the “Metropolitan Centre Zone”, as follows:</p> <p>Commercial Zones means the followings zones: Town Centre Zone, Local Centre Zone, Neighbourhood Centre Zone, Commercial Banks Peninsula Zone, Large Format Retail Zone, Commercial Office Zone, Mixed Use Zone, <u>Metropolitan Centre Zone</u>, City Centre Zone, Central City Mixed Use Zone and Central City Mixed Use (South Frame) Zone.</p>
8.	Habitable room	<p>Support in part.</p> <p>While Lendlease understands that the term “habitable room” is intended to be used in respect of the establishment of residential units within the Annual Aircraft Noise Contour and Engine Testing Contour, the reference to “office” within the definition is unqualified and has the potential to be interpreted as including commercial office space.</p> <p>Consistent with the purpose of the rule that the definition supports, Lendlease considers that the definition requires clarification and should be amended to reference “home office”.</p>	<p>Amend the definition of “Habitable room” as follows:</p> <p>Habitable room means any room used for the purposes of teaching or used as a living room, dining room, sitting room, bedroom, <u>home</u> office or other room specified in the District Plan to be a similarly occupied room.</p>
9.	Human scale	<p>Support in part.</p> <p>While Lendlease recognises that the term “human scale” needs to be read in the context of the policies that apply, the inclusion of the words “and lower building heights” implies that a reduction in building</p>	<p>Amend the definition of “Human scale” to remove the words “and lower building heights”, as follows:</p> <p>Human scale means incorporating dimensions that result in smaller built components <del>and lower building heights</del>, with</p>



### Schedule 1: Detailed submissions and relief sought

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	Provision	Submission	Relief Sought
		<p>height, below that permitted by the plan could be necessary to achieve “human scale”.</p> <p>Such an outcome would run counter to the requirements of Policy 3 of the NPS-UD and is not supported. Amendments are therefore required to this definition to remove the words “and lower building heights”.</p>	<p>attention to the human experience from eye level, relative to the physical size of a person.</p>
10.	Key Activity Centres	<p>Support in part.</p> <p>For the reasons discussed at item 6, above, as consequential change is required to the definition of “Key Activity Centres” to include reference to the “Metropolitan Centre Zone”.</p>	<p>Amend the definition of “Key Activity Centres” to include reference to the “Metropolitan Centre Zone”, as follows:</p> <p>Key Activity Centres means...</p> <p>...</p> <p>The key activity centre in each location is land zoned either <u>Metropolitan Centre</u>, Town Centre or Local Centre Zone.</p>
11.	New definition: Metropolitan Centre	<p>Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. Consistent with the proposed definitions for other centres, a definition of “Metropolitan Centre” is required to align with the description provided within the NPS.</p> <p>While Lendlease has identified that Hornby functions as a Metropolitan Centre, other large Town Centres, such as Riccarton and Papanui, may also meet the status of a Metropolitan Centre and should be identified in the definition.</p>	<p>Insert a new definition of Metropolitan Centre as follows:</p> <p><u>Metropolitan Centre means areas used predominantly for a broad range of commercial, community, recreational and residential activities. The zone is a focal point for sub-regional urban catchments.</u></p> <p><u>The Metropolitan Centre zone includes the Key Activity Centres at Hornby, [other].</u></p>
12.	Town Centre	Support in part.	Amend the definition of Town Centre as follows and provide for any other consequential amendments

### Schedule 1: Detailed submissions and relief sought

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	Provision	Submission	Relief Sought
		<p>The definition of Town Centre does not align with the description of the NPS. Aligning the definition of a with the description in the National Planning Standards will ensure that the proposal is consistent with this framework.</p> <p>It will also ensure that stakeholders, such as developers, residents, and businesses, have a clear understanding of what is meant by this term. This will reduce confusion and improve a consistent application of the District Plan.</p> <p>Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. A consequential change is required to the definition of “Town Centre” to delete the reference to Hornby.</p>	<p>following the review of the other Town Centres sought in item 3 above:</p> <p>Town Centre means <u>areas used predominantly for:</u></p> <ul style="list-style-type: none"> <li>• <u>in smaller urban areas, a range of commercial, community, recreational and residential activities.</u></li> <li>• <u>in larger urban areas, a range of commercial, community, recreational and residential activities that service the needs of the immediate and neighbouring suburbs.</u></li> </ul> <p>The Town Centre zones <u>includes the centres</u> at Belfast/Northwood, Eastgate/Linwood, <del>Hornby</del>, North Halswell, Papanui/Northlands, Riccarton, Shirley / Palms.</p>
13.	Neighbourhood Centre	<p>For the reasons discussed at item 12 above, amendments are required to the definition of Neighbourhood Centre to ensure that it aligns with the description of the NPS.</p>	<p>Amend the definition of Neighbourhood Centre, as follows:</p> <p>Means <del>the areas zoned Neighbourhood Centre</del> <u>Areas used predominantly for small-scale commercial and community activities that service the needs of the immediate residential neighbourhood.</u></p>
14.	Local Centre	<p>For the reasons discussed at item 12 above, amendments are required to the definition of Local Centre to ensure that it aligns with the description of the NPS.</p>	<p>Amend the definition of Local Centre, as follows:</p> <p>means:</p> <p><u>Areas used predominantly for a range of commercial and community activities that service the needs of the residential catchment.</u></p>

### Schedule 1: Detailed submissions and relief sought

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	Provision	Submission	Relief Sought
			<p><u>Includes</u> the Local Centre zone at Addington, Avonhead, Beckenham, Bishopdale, Colombo/Beaumont, Cranford, Edgware, Fendalton, Ferrymead, Halswell, Hillmorton, Ilam/Clyde, Merivale, New Brighton, Northwest Belfast, Parklands, Prestons, Redcliffs, Richmond, Linwood Village, Barrington, St Martins, Sumner, Sydenham North, Sydenham South, Wairakei/Greers Road, Wigram, Woolston and Yaldhurst;</p> <p>and</p> <p>the Commercial Banks Peninsula Zone at Lyttelton and Akaroa.</p>
15.	Large format centre	For the reasons discussed at item 12 above, amendments are required to the definition of Large format centre to ensure that it aligns with the description of the NPS.	<p>Amend the definition of large format centre, as follows:</p> <p><del>Large format centre</del> <u>retail zone</u>  <u>Means areas used predominantly for commercial, community, recreational and residential activities.</u></p> <p><u>Includes</u> those commercial centres at Moorhouse Avenue, Shirley Homebase, Tower Junction, Northlink Papanui, SupaCenta Belfast and Chappie Place Hornby zoned Large Format Retail Zone on the planning maps.</p>
Chapter 3 Strategic Directions			
16.	Whole Chapter	Except where specified below, Lendlease supports the amendments proposed to Chapter 3, as notified.	Retain Chapter 3 as notified, except where specified below.
17.	Objective 3.3.7 Well-functioning Urban Environment	Support in part. For the reasons discussed at item 6, above, as consequential change is required to Objective 3.3.7 to include reference to the “Metropolitan Centre Zone”.	<p>Amend Objective 3.3.7 to include reference to the Metropolitan Centre Zone, as follows:</p> <p>3.3.7 Objective – Well-functioning urban environment</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</p>

**Schedule 1: Detailed submissions and relief sought**Relief sought by the submitter is shown in ~~strike through~~ and underline

	Provision	Submission	Relief Sought									
			<p>their health and safety, now and into the future; including by recognising and providing for;</p> <p>i. Within commercial and residential zones, a distinctive, legible urban form and strong sense of place, expressed through:</p> <p>...</p> <p>E. The largest scale and density of development, outside of the city centre, provided within and around <u>metropolitan centres and town centres</u>, and lessening scale for centres lower in the hierarchy;</p> <p>...</p>									
	Chapter 6.1A Qualifying Matters											
18.	Whole chapter	Lendlease supports Chapter 6.1A Qualifying Matters as notified.	Retain Chapter 6.1A as notified.									
	Chapter 6.1 Noise											
19.	Whole chapter	Lendlease supports the changes to Chapter 6.1 as notified.	Retain Chapter 6.1 as notified.									
	Chapter 6.3 Lighting											
20.	Whole chapter	Lendlease supports the changes to Chapter 6.3 as notified.	Retain Chapter 6.3 as notified.									
	Chapter 6.8 Signs											
21.	Whole chapter	Except where specified below, Lendlease supports the amendments proposed to Chapter 6.8, as notified.	Retain Chapter 6.8 as notified, except where specified below.									
22.	6.8.4.1.1 Permitted activities	<p>Support in part.</p> <p>Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. Consequential changes are required to the permitted activities to include reference to “Metropolitan Centre”.</p>	<p>Amend the table contained in 6.8.4.1.1 to include reference to “Metropolitan Centre”, as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Activity</th> <th>Activity Specific standards</th> </tr> </thead> <tbody> <tr> <td>...</td> <td>...</td> <td>...</td> </tr> <tr> <td>P8</td> <td>Business and building identification signs made of three</td> <td>...</td> </tr> </tbody> </table>		Activity	Activity Specific standards	...	...	...	P8	Business and building identification signs made of three	...
	Activity	Activity Specific standards										
...	...	...										
P8	Business and building identification signs made of three	...										

**Schedule 1: Detailed submissions and relief sought**

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Provision		Submission	Relief Sought		
		No additional signage opportunity is sought to be enabled, beyond that which can currently be established within the Commercial Core Zone at Hornby.		dimensional letters and/or symbols in: ... b. all commercial zones other than: <u>ai. the Metropolitan Zone;</u> i. the Town or Local Centre Zone in a Key Activity Centre where the maximum building height is 20 metres; ...	
			P9	Business and building identification signs made of three dimensional letters and/or symbols in: <u>aa. the Metropolitan Centre Zone;</u> a. Town Centre or Local Centre Zones in Key Activity Centres where the maximum building height is 20 metres; ...	...
23.	6.8.4.2.4 Signs attached to buildings	Support in part.  Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. Consequential changes are required to the signage standards to include reference to “Metropolitan Centre”.	Amend the table contained in 6.8.4.2.4 to include reference to “Metropolitan Centre”, as follows:		
			Zone or scheduled activity	Maximum total area of signs per building	Maximum height above ground level at top of sign

### Schedule 1: Detailed submissions and relief sought

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Provision		Submission	Relief Sought			
		No additional signage opportunity is sought to be enabled, beyond that which can currently be established within the Commercial Core Zone at Hornby.	...	...	...	
			<del>Town Centre</del> <u>Metropolitan Centre</u> or Local Centre Zone (Hornby and The Palms Mall only)	Length along primary building frontage (m) x 1m	Where the maximum height standard is 20 metres, 9 metres or façade height, whichever is lower.  Where the maximum height standard is 12 metres, 6 metres or façade height, whichever is lower	
			...	...	...	
24.	6.8.4.2.6 Freestanding signs	Support in part.  Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. Consequential changes are required to the freestanding signage standards to include reference to “Metropolitan Centre”.  No additional signage opportunity is sought to be enabled, beyond that which can currently be established within the Commercial Core Zone at Hornby.	Amend the table contained in 6.8.4.2.6 to include reference to “Metropolitan Centre”, as follows:			
			Zone or scheduled activity	Pedestrian entrance	Relating to Pedestrian Entrances	Relating to Vehicle Entrances
			...	...	...	...
			<u>Metropolitan Centre</u> , Town Centre or Local Centre Zone	1 for each formed vehicle access (refer to Rule 6.8.4.2.6 c. and d. below) and 1 for each formed pedestrian	Max width: 1 metre  Max total area: 2m <sup>2</sup>  Max height above ground level	Max width: 2.5 metres (other than billboards permitted under Rule 6.8.4.1.1 P15)  Max total area:

**Schedule 1: Detailed submissions and relief sought**Relief sought by the submitter is shown in ~~strike through~~ and underline

Provision		Submission	Relief Sought			
				entrance (refer to Rule 6.8.4.2.6 d. below), (other than billboards permitted under Rule 6.8.4.1.1 P15)	at top of sign: 2 metres	18m <sup>2</sup>  Max height above ground level at top of sign:  9 metres
			...	...	...	...
Chapter 7 Transport						
25.	Whole chapter	Lendlease supports the changes to Chapter 7 as notified.	Retain Chapter 7 as notified.			
Chapter 8 Subdivision, Development and Earthworks						
26.	Whole chapter	Except where specified below, Lendlease supports the amendments proposed to Chapter 8, as notified.	Retain Chapter 8 as notified, except where specified below.			
27.	8.6.1 Minimum net site area and dimension	Support in part.  Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. Consequential changes are required to the subdivision standards to include reference to “Metropolitan Centre”.  No additional subdivision opportunity is sought to be enabled, beyond that which can currently be undertaken within the Commercial Core Zone at Hornby.	Amend Table 2 of 8.6.1 to include reference to the Metropolitan Centre Zone, as follows:			
				<b>Zone</b>	<b>Minimum net site area</b>	
			a.	<u>Metropolitan Centre Zone</u> , Neighbourhood Centre Zone, Local Centre Zone, Town Centre Zone, Commercial Office, Mixed Use Zone, Large Format Retail Zone, and Commercial Banks Peninsula Zones	250m <sup>2</sup>	
			...	...	...	
28.	8.6.2	Support in part.	Amend Table 6 of 8.6.2 to include reference to the Metropolitan Centre Zone, as follows:			

### Schedule 1: Detailed submissions and relief sought

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Provision		Submission	Relief Sought												
	Allotments with existing or proposed buildings	<p>Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. Consequential changes are required to the subdivision standards to include reference to “Metropolitan Centre”.</p> <p>No additional subdivision opportunity is sought to be enabled, beyond that which can currently be undertaken within the Commercial Core Zone at Hornby.</p>	<table border="1"> <thead> <tr> <th></th> <th>Zone</th> <th>Minimum net site area</th> </tr> </thead> <tbody> <tr> <td>...</td> <td>...</td> <td>...</td> </tr> <tr> <td>h.</td> <td>Industrial General, Industrial Heavy, Industrial Park, Commercial Office, Neighbourhood Centre, Local Centre, Town Centre, <u>Metropolitan Centre</u>, City Centre Commercial Banks Peninsula, Mixed use, Central City Mixed Use and Large Format Zones</td> <td>No minimum</td> </tr> <tr> <td>...</td> <td>...</td> <td>...</td> </tr> </tbody> </table>		Zone	Minimum net site area	...	...	...	h.	Industrial General, Industrial Heavy, Industrial Park, Commercial Office, Neighbourhood Centre, Local Centre, Town Centre, <u>Metropolitan Centre</u> , City Centre Commercial Banks Peninsula, Mixed use, Central City Mixed Use and Large Format Zones	No minimum	...	...	...
	Zone	Minimum net site area													
...	...	...													
h.	Industrial General, Industrial Heavy, Industrial Park, Commercial Office, Neighbourhood Centre, Local Centre, Town Centre, <u>Metropolitan Centre</u> , City Centre Commercial Banks Peninsula, Mixed use, Central City Mixed Use and Large Format Zones	No minimum													
...	...	...													
29.	8.9.2.1 Permitted activities - earthworks	<p>Support in part.</p> <p>Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. Consequential changes are required to the earthworks standards to include reference to “Metropolitan Centre”.</p> <p>No additional earthworks volumes are sought, beyond that which can currently be undertaken within the Commercial Core Zone at Hornby.</p>	<p>Amend Table 9 of 8.9.2.1 to include reference to the Metropolitan Centre Zone, as follows:</p> <table border="1"> <thead> <tr> <th colspan="2">Zone/Overlay</th> <th>Volume</th> </tr> </thead> <tbody> <tr> <td>...</td> <td>...</td> <td>...</td> </tr> <tr> <td>e. Commercial / Industrial</td> <td>ii. <u>Metropolitan Centre</u>, Local Centre, Town Centre, Commercial Office, Commercial Mixed use, Central City Mixed Use, Mixed Use (South Frame), Large Format Retail, Industrial General, Industrial Heavy and Industrial Park Zones.</td> <td>1000m<sup>3</sup>/ha</td> </tr> <tr> <td>...</td> <td>...</td> <td>...</td> </tr> </tbody> </table>	Zone/Overlay		Volume	...	...	...	e. Commercial / Industrial	ii. <u>Metropolitan Centre</u> , Local Centre, Town Centre, Commercial Office, Commercial Mixed use, Central City Mixed Use, Mixed Use (South Frame), Large Format Retail, Industrial General, Industrial Heavy and Industrial Park Zones.	1000m <sup>3</sup> /ha	...	...	...
Zone/Overlay		Volume													
...	...	...													
e. Commercial / Industrial	ii. <u>Metropolitan Centre</u> , Local Centre, Town Centre, Commercial Office, Commercial Mixed use, Central City Mixed Use, Mixed Use (South Frame), Large Format Retail, Industrial General, Industrial Heavy and Industrial Park Zones.	1000m <sup>3</sup> /ha													
...	...	...													



**Schedule 1: Detailed submissions and relief sought**

Relief sought by the submitter is shown in ~~strike through~~ and underline

	<b>Provision</b>	<b>Submission</b>	<b>Relief Sought</b>
	Chapter 15 Commercial		
30.	Whole chapter	Except where specified below, Lendlease supports the amendments proposed to Chapter 15, as notified.	Retain Chapter 15 as notified, except where specified below.
31.	15.1 Introduction	<p>Support in part.</p> <p>Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. Consequential changes are required to the introduction to include reference to “Metropolitan Centre”.</p>	<p>Amend 15.1 Introduction to include reference to the “Metropolitan Centre Zone”, as follows:</p> <p>15.1 Introduction</p> <p>...</p> <p>d. This chapter seeks to manage commercial activity in the City through a 'centres-based' approach. The hierarchy of centres comprises the City Centre, <u>Metropolitan Centres</u>, Town Centres, Local Centres, Neighbourhood Centres, and Large Format Centres. The ‘centres-based’ approach gives primacy to the City Centre and recognises its role as a principal employment and business centre for the City and surrounding region. Existing commercial activity in existing office parks and mixed use zones is also recognised.</p>
32.	15.2.2 Objective - Centres-based framework for commercial activities	<p>Support in part.</p> <p>Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. Consequential changes are required to the objective to include reference to “Metropolitan Centre”.</p> <p>Amendments to the objective are also required to ensure that the description of the role of each type of centre is consistent with that of the National Planning Standards 2019.</p>	<p>Amend Objective 15.2.2 to include reference to the “Metropolitan Centre Zone” as follows:</p> <p>15.2.2 Objective – Centres-based framework for commercial activities</p> <p>a. Commercial activity is focussed within a network of centres (comprising the City Centre, <u>Metropolitan Centres</u>, Town Centres, Local Centres, Neighbourhood Centres, and Large Format Centres) to meet the wider community’s and businesses' needs in a way and at a rate that:</p> <p>i. supports intensification within centres;</p>

### Schedule 1: Detailed submissions and relief sought

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	Provision	Submission	Relief Sought
			<ul style="list-style-type: none"> <li>ii. enables the efficient use and continued viability of the physical resources of commercial centres and promotes their success and vitality, reflecting their critical importance to the local economy;</li> <li><u>iiia. supports the function of the Metropolitan Centres as focal points for a broad range of commercial, community, recreational and residential activities, servicing the sub-regional needs of communities, businesses and residents;</u></li> <li>iii. supports the function of Town Centres as <del>major</del> focal points for commercial activities, entertainment activities, visitor accommodation, employment, transport and community activities <u>that service the needs of the immediate and neighbouring suburbs,</u> and Local Centres as a focal point for primarily small-scale commercial activities with a focus on convenience shopping, community activities and guest accommodation <u>that service the needs of the residential catchment;</u></li> <li>iv. gives primacy to the City Centre followed by <u>Metropolitan Centres,</u> Town Centres and Local Centres identified as Key Activity Centres;</li> <li>v. is consistent with the role of each centre as defined in 15.2.2.1 Policy – Role of centres Table 15.1;</li> <li>vi. supports a compact and sustainable urban form that provides for the integration of commercial activity with guest accommodation, community activity, residential activity and recreation activity in locations accessible by a range of modes of transport;</li> </ul>

**Schedule 1: Detailed submissions and relief sought**

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	Provision	Submission	Relief Sought
			<ul style="list-style-type: none"> <li>vii. supports the recovery of centres that sustained significant damage or significant population loss from their catchment, including the City Centre, Linwood, and Local Centres subject to 15.2.4.3 Policy Suburban centre master plans;</li> <li>viii. enhances their vitality and amenity and provides for a range of activities and community facilities;</li> <li>ix. manages adverse effects on the transport network and public and private infrastructure;</li> <li>x. is efficiently serviced by infrastructure and is integrated with the delivery of infrastructure; and</li> <li>xi. recognises the values of, and manages adverse effects on, sites of Ngāi Tahu cultural significance identified in Appendix 9.5.6 and natural waterways (including waipuna).</li> </ul>
33.	15.2.2.1 Policy – Role of centres	<p>Support in part.</p> <p>Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. Consequential changes are required to the policy to include reference to “Metropolitan Centre”.</p> <p>Amendments to the policy are also required to ensure that the description of the role of each type of centre is consistent with that of the National Planning Standards 2019.</p> <p>Consequential changes to the policy may also be required following the completion of the review of the other Town Centres, identified at item 3, above.</p>	<p>Amend Policy 15.2.2.1 and Table 15.1 to include reference to the “Metropolitan Centre Zone”, as follows, including any consequential changes as a result of the review of the other Town Centres, identified at item 3, above:</p> <p>15.2.2.1 Policy – Role of centres</p> <ul style="list-style-type: none"> <li>a. Recognise and manage commercial centres as the focal points for the community and business through intensification within centres that reflects their functions and catchment sizes, and in accordance with a framework that: <ul style="list-style-type: none"> <li>i. gives primacy to, and supports, the recovery of the City Centre, followed by <u>Metropolitan Centres and Key Activity Centres</u>, by managing the size</li> </ul> </li> </ul>

**Schedule 1: Detailed submissions and relief sought**

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	Provision	Submission	Relief Sought									
			<p>of all centres and the range and scale of activities that locate within them;</p> <p>ii. supports and enhances the role of Town Centres; and</p> <p>iii. maintains the role of Local Centres, Neighbourhood Centres and Large Format Centres.</p> <p>as set out in Policy 15.2.2.1, Table 15.1 – Centre’s role.</p> <p>Table 15.1 – Centre’s role</p> <table border="1"> <thead> <tr> <th data-bbox="1359 651 1435 715"></th> <th data-bbox="1435 651 1816 715">Role</th> <th data-bbox="1816 651 2036 715">Centre and size (where relevant)</th> </tr> </thead> <tbody> <tr> <td data-bbox="1359 715 1435 778">A.</td> <td data-bbox="1435 715 1816 778">Central Business District ...</td> <td data-bbox="1816 715 2036 778">Centre: City Centre</td> </tr> <tr> <td data-bbox="1359 778 1435 1393"><u>AA.</u></td> <td data-bbox="1435 778 1816 1393"> <u>Metropolitan Centre</u>   <u>Used predominantly for a broad range of commercial, community, recreational and residential activities and is a focal point for sub-regional urban catchments.</u>   <u>Serves as a hub for commercial growth and development, community interaction, and high-frequency transportation services. These centres are second in scale and intensity only to the Central Business District.</u>   <u>Plays a significant role in accommodating growth and</u> </td> <td data-bbox="1816 778 2036 1393"><u>Centres: Hornby</u></td> </tr> </tbody> </table>		Role	Centre and size (where relevant)	A.	Central Business District ...	Centre: City Centre	<u>AA.</u>	<u>Metropolitan Centre</u>  <u>Used predominantly for a broad range of commercial, community, recreational and residential activities and is a focal point for sub-regional urban catchments.</u>  <u>Serves as a hub for commercial growth and development, community interaction, and high-frequency transportation services. These centres are second in scale and intensity only to the Central Business District.</u>  <u>Plays a significant role in accommodating growth and</u>	<u>Centres: Hornby</u>
	Role	Centre and size (where relevant)										
A.	Central Business District ...	Centre: City Centre										
<u>AA.</u>	<u>Metropolitan Centre</u>  <u>Used predominantly for a broad range of commercial, community, recreational and residential activities and is a focal point for sub-regional urban catchments.</u>  <u>Serves as a hub for commercial growth and development, community interaction, and high-frequency transportation services. These centres are second in scale and intensity only to the Central Business District.</u>  <u>Plays a significant role in accommodating growth and</u>	<u>Centres: Hornby</u>										

### Schedule 1: Detailed submissions and relief sought

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	Provision	Submission	Relief Sought	
			<p><u>intensification, providing for a diverse range of commercial, cultural, community, civic, leisure, high-density residential, and tourist activities.</u></p> <p><u>Is a suitable locations for commercial activities of all sizes.</u></p> <p><u>The extent of the centre is the Metropolitan Centre Zone.</u></p>	
			<p>B. Town Centre – Key Activity Centre</p> <p>Used predominantly for:</p> <ul style="list-style-type: none"> <li>• <u>in smaller urban areas, a range of commercial, community, recreational and residential activities.</u></li> <li>• <u>in larger urban areas, a range of commercial, community, recreational and residential activities that service the needs of the immediate and neighbouring suburbs.</u></li> </ul> <p><u>Major retail destination for typically comprises</u> comparison and convenience shopping and a focal point for employment (including offices), community activities and community facilities (including libraries, meeting places), entertainment</p>	<p>Centres: Riccarton, <del>Hornby</del>, Papanui/ Northlands, Shirley/ Palms, Eastgate/ Linwood, Belfast/ Northwood, North Halswell (emerging)</p> <p>Size: Greater than 30,000m<sup>2</sup></p>

**Schedule 1: Detailed submissions and relief sought**Relief sought by the submitter is shown in ~~strike through~~ and underline

Provision		Submission	Relief Sought
			<p>activities, food and beverage and visitor accommodation.</p> <p>High density housing is contemplated above ground floor level and around the centre.</p> <p>Anchored by large retailers including department store(s) and supermarket(s).</p> <p>Serves the needs of <del>a wide primary catchment extending over several suburbs</del> <u>the immediate and neighbouring suburbs</u>.</p> <p>Accessible by a range of modes of transport, including multiple bus routes. Public transport facilities, including an interchange, may be incorporated.</p> <p>The extent of the centre is the Town Centre Zone.</p>
34.	15.2.4 Objective - Urban form, scale and design outcomes	Support in part.  Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. Consequential changes are required to the objective to include reference to “Metropolitan Centre”.	Amend Objective 15.2.4 to include reference to the “Metropolitan Centre Zone” as follows:  15.2.4 Objective – Urban form, scale and design outcomes a. A scale, form and design of development that is consistent with the role of a centre and its

**Schedule 1: Detailed submissions and relief sought**Relief sought by the submitter is shown in ~~strike through~~ and underline

	<b>Provision</b>	<b>Submission</b>	<b>Relief Sought</b>
			<p>contribution to city form, and the intended built form outcomes for mixed use zones, and which:</p> <ul style="list-style-type: none"> <li>i. recognises the Central City, <u>Metropolitan Centres</u> and Town Centres as strategically important focal points for community and commercial investment;</li> <li>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;</li> <li>iii. recognises the functional and operational requirements of activities and the anticipated built form;</li> <li>iv. manages adverse effects (including reverse sensitivity effects) on the site and surrounding environment including effects that contribute to climate change; and v. recognises Ngāi Tahu/ mana whenua values through landscaping and the use of low impact urban design, where appropriate; and</li> <li>vi. supports a reduction in greenhouse gas emissions.</li> </ul>
35.	15.2.4.1 Policy – Scale and form of development	<p>Support in part.</p> <p>Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. Consequential changes are required to policy “b” to include reference to “Metropolitan Centre”.</p>	<p>Amend Policy 15.2.4.1 b to reference the “Metropolitan Centre Zone”, as follows:</p> <p>15.2.4.1 Policy – Scale and form of development ...</p> <ul style="list-style-type: none"> <li>b. Reflect the context, character and the anticipated scale of the zone and centre’s function by: <ul style="list-style-type: none"> <li>i. providing for the tallest buildings and greatest scale of development in the city centre to reinforce its primacy for Greater Christchurch and</li> </ul> </li> </ul>

**Schedule 1: Detailed submissions and relief sought**

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	<b>Provision</b>	<b>Submission</b>	<b>Relief Sought</b>
			<p>enable as much development capacity as possible to maximise the benefits of intensification;</p> <p>ia. <u>providing for building heights and density of urban form within metropolitan centres to reflect demand for housing and business use in those locations;</u></p> <p>ii. providing for building heights and densities within town, local and neighbourhood centres commensurate with their role and level of commercial and community activities;</p> <p>iii. for Key Activity Centres and Large Format Centres, enable larger floor plates while maintaining a high level of amenity in the centre; and</p> <p>iv. for comprehensive residential development in the Mixed Use Zone, achieve a high density scale of development that contributes to a perimeter block urban form; and</p> <p>v. manage adverse effects on the surrounding environment, particularly at the interface with residential areas, sites of Ngāi Tahu cultural significance identified in Appendix 9.5.6 and natural waterways.</p>
36.	15.3 How to interpret and apply the rules	<p>Support in part.</p> <p>Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”. A consequential change to section 15.3 is required to reference the “Metropolitan Centre”.</p>	<p>Amend 15.3 to include reference to the “Metropolitan Centre Zone” as follows:</p> <p>15.3 How to interpret and apply the rules</p> <p>a. The rules that apply to activities in the various commercial zones commercial zones are contained in the activity status tables (including activity specific standards) and built form standards in:</p> <p>ia. <u>Rule 15.4A Metropolitan Centre Zone;</u></p>



**Schedule 1: Detailed submissions and relief sought**

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	<b>Provision</b>	<b>Submission</b>	<b>Relief Sought</b>
			i. ...
37.	New provisions Metropolitan Centre Rules	<p>Lendlease seeks that the Hornby Commercial Core is rezoned “Metropolitan Centre Zone”.</p> <p>The proposed rules for the Metropolitan Centre Zone are appended to this submission as Schedule 2.</p> <p>In preparing the rules for the Metropolitan Centre Zone:</p> <ul style="list-style-type: none"> <li>• A full range of activities is provided for to reflect its role as servicing a sub-regional catchment.</li> <li>• The rules and activity specific standards are consistent with the approach taken for the City Centre Zone and Town Centre Zone.</li> <li>• To maintain the “primacy” of the City Centre Zone, a maximum permitted height of 45m is proposed, being half the permitted height of the City Centre Zone, and the same height as the City Centre Cathedral Square and Victoria Street Height Precincts. This additional height is required to encourage additional employment and residential options in the area, and the increased built form will increase foot traffic in the area, encouraging further retail activity and employment.</li> </ul>	Insert the rules for the “Metropolitan Centre Zone” as per Schedule 2 of this submission.

**Schedule 2**

## Schedule 2: Metropolitan Centre Zone Rules

### 15.4A Rules – Metropolitan Centre Zone

#### 15.4A.1 Activity status tables – Metropolitan Centre Zone

##### 15.4A.1.1 Permitted activities

- a. The activities listed below are permitted activities in the Metropolitan Centre Zone if they meet the activity specific standards set out in this table and the built form standards in Rule 15.4A.2. Note, the built form standards do not apply to an activity that does not involve any development.
- b. Activities may also be controlled, restricted discretionary, discretionary, non-complying or prohibited as specified in Rules 15.4A.1.2, 15.4A.1.3, 15.4A.1.4, 15.4A.1.5 and 15.4A.1.6.
- c. The activities listed below include any associated landscaping, access, parking areas, loading, waste management areas and other hardstanding areas.

Activity		Activity specific standards
P1	Any new building or addition to a building, for any permitted activity listed in Rule 15.4A.1.1 P2 to P17.	Nil
P2	Retail activity	Nil
P3	Commercial services	Nil
P4	Entertainment activity	Nil
P5	Recreation activity	a. For sites shown on the planning maps as being within active frontage areas, these activities shall not be located at ground level within 10 metres of the boundary of a road (excluding access ways and service lanes), except for pedestrian entranceways, which may be located at ground floor level.
P6	Gymnasium	
P7	Community facility	
P8	Education activity	
P9	Day care facility	
P10	Preschool	
P11	Health care facility	
P12	Spiritual activity	
P13	Office	a. For sites shown on the planning maps as being within active frontage areas, the activity shall not be located at ground floor level within 10 metres of the boundary of a road (excluding access ways and service lanes), except for pedestrian entranceways or reception areas, which may be located at ground floor level. b. Each residential unit shall be provided with an outdoor service space contained within the net site area with a minimum area of 5m <sup>2</sup> and each dimension being a minimum of 1.5 metres, except that:
P14	Residential activity	

## Schedule 2: Metropolitan Centre Zone Rules

Activity	Activity specific standards
	<ul style="list-style-type: none"> <li>i. an indoor area or areas with a minimum volume of 3m<sup>3</sup> may be provided in lieu of any outdoor service space; or</li> <li>ii. if a communal outdoor service space with a minimum area of 10m<sup>2</sup> is provided within the site, the outdoor service space may reduce to 3m<sup>2</sup> for each residential unit.</li> </ul> <p>c. The minimum net floor area for any residential unit (including toilets and bathrooms but excluding car parking area, garages, or balconies allocated to each unit) shall be:</p> <ul style="list-style-type: none"> <li>i. studio 35m<sup>2</sup>;</li> <li>ii. 1 bedroom 45m<sup>2</sup>;</li> <li>iii. 2 bedrooms 60m<sup>2</sup>; and</li> <li>iv. 3 or more bedrooms 90m<sup>2</sup>.</li> </ul> <p>d. Each residential unit without a habitable space on the ground floor shall have 10m<sup>2</sup> of outdoor living space provided that:</p> <ul style="list-style-type: none"> <li>i. a minimum of 58m<sup>2</sup> of the area, with each dimension being a minimum of 1.58 metres, shall be provided as a private balcony located immediately outside, and accessible from an internal living area of the residential unit; and</li> <li>ii. the balance of the required 10m<sup>2</sup> not provided by private balconies can be provided in a communal area, with each dimension being a minimum of 4 metres, that is available for the use of all site residents.</li> </ul> <p>Advice note:</p> <ul style="list-style-type: none"> <li>e. Balconies can be recessed, cantilevered or semi-recessed.</li> <li>f. Each residential unit with a habitable space on the ground floor shall have 10m<sup>2</sup> of outdoor living space immediately outside and accessible from an internal living area of the residential unit, with a minimum dimension of 4m.</li> <li>g. Any outdoor service space or outdoor living space shall not be used as a car parking area or access.</li> <li>h. Each residential unit shall have an outlook space from habitable room windows, oriented over land within the development site or a street or public space, with:</li> </ul>

## Schedule 2: Metropolitan Centre Zone Rules

Activity		Activity specific standards
		<ul style="list-style-type: none"> <li>i. a minimum dimension 4m in depth and 4m in width for a living room</li> <li>ii. a minimum dimension 3m in depth and 3m in width for a bedroom.</li> <li>i. The outlook space shall not extend over an outlook space or outdoor living space required by another residential unit.</li> </ul>
P15	Visitor accommodation	a. The activity shall not be located at ground floor level within 10 metres of the boundary of a road (excluding access ways and service lanes), except for pedestrian entranceways or reception areas, which may be located at ground floor level.
P16	Art studios and workshops	Nil
P17	Retirement village	Nil

### 15.4A.1.2 Controlled activities

- a. The activities listed below are controlled activities.
- b. Discretion to impose conditions is restricted to the matters over which control is reserved, as set out in Rule 15.14A.2.1 b.

	Activity
<b>C1</b>	<ul style="list-style-type: none"> <li>a. Any activity listed in Rule 15.4A.1.1 P1-P17 requiring consent under Rule 15.4A.2.1(b).</li> <li>b. Any application arising from this rule shall not be limited or publicly notified</li> </ul>

### 15.4A.1.3 Restricted discretionary activities

- a. The activities listed below are restricted discretionary activities.
- b. Discretion to grant or decline consent and impose conditions is restricted to the matters of discretion set out in Rule 15.14, as set out in the following table.

	Activity	The Council's discretion shall be limited to the following matters:
<b>RD1</b>	<ul style="list-style-type: none"> <li>a. Any activity listed in Rule 15.4A.1.1P14 that does not meet one or more of the activity specific standards a.- i.</li> <li>b. Any application arising from this rule shall not be limited or publicly notified other than for any breach of standards (h) and (i), which must not be publicly notified.</li> </ul>	<ul style="list-style-type: none"> <li>a. Residential activity – Rule 15.14.2.3</li> <li>b. Activity at ground floor level – Rule 15.14.2.2</li> <li>c. Glazing – Rule 15.14.3.37</li> <li>d. Outlook spaces – Rule 15.14.38</li> </ul>
<b>RD2</b>	Any activity listed in Rule 15.4A.1.1 P1-P17 and Rule 15.4A.1.3 RD3 to	a. As relevant to the built form standard that is not met:

## Schedule 2: Metropolitan Centre Zone Rules

	<p>RD6, that do not meet one or more of the built form standards in Rule 15.4A.2.1 c. and Rules 15.4A.2.2 – 15.4A.2.16, unless otherwise specified.</p> <p>Advice note: 1. Refer to relevant built form standard for provisions regarding notification.</p>	<ul style="list-style-type: none"> <li>i. Urban design – Rule 15.14.1</li> <li>ii. Maximum building height – Rule 15.14.3.1</li> <li>iii. Minimum separation from the internal boundary with a residential or open space zone – Rule 15.14.3.3</li> <li>iv. Sunlight and outlook at boundary with a residential zone – Rule 15.14.3.4</li> <li>v. Water supply for fire fighting – Rule 15.14.3.8</li> <li>vi. Minimum building setback from the railway corridor – Rule 15.14.3.10</li> <li>vii. Building setback and continuity – Rule 15.14.3.15</li> <li>viii. Sunlight and outlook for the street – Rule 15.14.3.17</li> <li>ix. Minimum number of floors – Rule 15.14.3.18</li> <li>x. Flexibility in building design for future uses – Rule 15.14.3.19</li> <li>xi. Location of on-site car parking – Rule 15.14.3.20</li> <li>xii. Screening of outdoor storage and service areas/spaces – Rule 15.14.3.22</li> <li>xiii. Minimum separation from the boundary with a residential zone – Rule 15.14.3.24</li> <li>xiv. Upper floor setbacks, tower dimension and site coverage – Rule 15.14.3.35</li> <li>xv. Wind – 15.14.3.39</li> </ul>
<b>RD3</b>	<ul style="list-style-type: none"> <li>a. Service station</li> <li>b. Any application arising from this rule shall not be limited or publicly notified.</li> </ul>	<ul style="list-style-type: none"> <li>a. Centre vitality and amenity – Rule 15.14.2.4</li> </ul>
<b>RD4</b>	<ul style="list-style-type: none"> <li>a. Any activity listed in Rule 15.4A.1.1P5-P13 that do not meet the activity specific standards.</li> <li>b. Any application arising from this rule shall not be limited or publicly notified.</li> </ul>	<ul style="list-style-type: none"> <li>a. Centre vitality and amenity – Rule 15.14.2.4</li> </ul>
<b>RD5</b>	<ul style="list-style-type: none"> <li>a. Parking building</li> <li>b. Any application arising from this rule shall not be limited or publicly notified.</li> </ul>	<ul style="list-style-type: none"> <li>a. Urban design – Rule 15.14.1</li> </ul>

## Schedule 2: Metropolitan Centre Zone Rules

### 15.4A.1.4 Discretionary activities

- a. The activities listed below are discretionary activities.

	Activity
<b>D1</b>	Any activity not provided for as a permitted, controlled, restricted discretionary, non-complying or prohibited activity.

### 15.14A.1.5 Non-complying activities

- a. The activities listed below are non-complying activities.

	Activity
<b>NC1</b>	Sensitive activities within the 50 dB Ldn Air Noise Contour as defined on the planning maps.
<b>NC2</b>	<p>a. Sensitive activities</p> <p>i. within 12 metres of the centre line of a 220kV National Grid transmission line or within 12 metres of a foundation of an associated support structure.</p> <p>ii. within 10 metres of the centre line of a 66kV electricity distribution line or within 10 metres of a foundation of an associated support structure.</p> <p>b. Buildings on greenfield sites within 10 metres of the centre line of a 66kV electricity distribution line or within 10 metres of a foundation of an associated support structure.</p> <p>c. Buildings, other than those in (b) above,</p> <p>i. within 12 metres of the foundation of a 220kV National Grid transmission support structure.</p> <p>ii. within 10 metres of the foundation of an associated support structure.</p> <p>d. Fences within 5 metres of a National Grid transmission line support structure foundation or a 66kV electricity distribution line support structure foundation.</p> <p>e. Any application arising from rules (a)(ii), (b), (c)(ii) and (d) with regard to a 66kV electricity distribution line above shall not be publicly notified, and shall be limited notified only to Orion New Zealand Limited or other electricity distribution network operator (absent its written approval).</p> <p>Advice notes:</p> <ol style="list-style-type: none"> <li>1. The National Grid transmission lines and 66kV electricity distribution lines are shown on the planning maps.</li> <li>2. Vegetation to be planted around the electricity distribution lines should be selected and/or managed to ensure that it will not result in that vegetation breaching the Electricity (Hazards from Trees) Regulations 2003.</li> <li>3. The New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001) contains restrictions on the location of structures and activities in relation to National Grid transmission lines and electricity distribution line. Buildings and activities in the vicinity of National Grid transmission lines or electricity distribution lines must comply with the NZECP 34:2001.</li> </ol>

## Schedule 2: Metropolitan Centre Zone Rules

	4. Notice of any application made in relation to rules (a)(i), (c)(i) and (d) with regard to National Grid transmission lines shall be served on Transpower New Zealand in accordance with Clause 10(2) of the Resource Management (Forms, Fees, and Procedure) Regulations 2003.
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### 15.4A.1.6 Prohibited activities

There are no prohibited activities.

### 15.4A.2 Built form standards – Metropolitan Centre Zone

Advice note: There is no spare, or limited, wastewater, storm water, or water supply infrastructure capacity in some areas of Christchurch City which may create difficulties in granting a building consent for some developments. Alternative means of providing for those services may be limited or not available. Compliance with the District Plan does not guarantee that connection to the Council's reticulated infrastructure is available or will be approved. Connection to the Council's reticulated infrastructure requires separate formal approval from the Council. There is a possibility that approval to connect will be declined, or development may trigger the need for infrastructure upgrades or alternative servicing at the developer's cost. Anyone considering development should, at an early stage, seek information on infrastructure capacity from Council's Three Waters Unit. Please contact the Council's Three Waters Unit at [WastewaterCapacity@ccc.govt.nz](mailto:WastewaterCapacity@ccc.govt.nz), [WaterCapacity@ccc.govt.nz](mailto:WaterCapacity@ccc.govt.nz) and [Stormwater.Approvals@ccc.govt.nz](mailto:Stormwater.Approvals@ccc.govt.nz).

- a. The following built form standards shall be met by all permitted activities and restricted discretionary activities RD1 – RD6, unless otherwise stated.

#### 15.4A.2.1 Urban design

	Activity Status	Applicable to	Matters of control or discretion
a.	Permitted activity	Any new building or addition to a building for activities listed in Rule 15.4A.1.1 P1 to P17 22m or less in height	Nil
b.	Controlled activity	Any new building or addition to a building for activities listed in Rule 15.4A.1.1 P1 to P17 that exceed permitted standard 15.4A.2.1.a. but is less than 45m in height and is certified by a qualified urban design expert on a Council approved list as meeting each of the urban design provisions/ outcomes in Rule 15.4A.1 Urban design (a)(i)-(ix). Certification shall include sufficient detail to demonstrate how the relevant urban design	a. That the new building or addition to a building is built in accordance with the urban design certification.



**Schedule 2: Metropolitan Centre Zone Rules**

		provisions / outcomes in Rule 15.4A.1 have been met.	
c.	Restricted discretionary	Any new building or addition to a building that is not a permitted or controlled activity under Rule 15.4A.2.1 a or b.	a. Urban design – Rule 15.14.1
d.	Any application arising from this rule shall not be limited or publicly notified.		

## Advice note:

1. Any building or an addition to a building requiring resource consent under Rule 15.4A.2.1 is exempt from meeting Rule 15.4A.2.3.
2. The following forms of development are exempt from compliance with this rule:
  - a. Repairs, maintenance, and seismic, fire and/or access building code upgrades; or
  - b. Refurbishment, reinstatement works.
3. The following activities in Rule 15.4A.1.1 are exempt from compliance with this rule:
  - a. P7 Community facility; P8 Education activity; P10 Preschool; P11 Health care facility; P12 Spiritual activity.

**15.4A.2.3 Building setback and continuity**

- a. Buildings (excluding fences for the purposes of this standard) shall be built:
  - i. up to a road boundary, except that where the allotment fronts more than one road boundary, buildings shall be built up to all road boundaries of the allotment; and
  - ii. across a minimum of 65% of the width of an allotment where it abuts all road boundaries (excluding access ways and service lanes).
- b. Any application arising from this rule shall not be limited or publicly notified.

## Advice note:

1. This rule applies to the ground and first floor of buildings only.

**15.4A.2.4 Sunlight and outlook for the street**

- a. Buildings shall not project beyond a 45 degree recession plane measured from the maximum road wall height and angling into the site:
  - i. up to a maximum height of 22m; or
  - ii. for sites located on a street intersection, this rule shall not apply within 30m of the street corner.
- b. Any application arising from this rule shall not be limited or publicly notified.

**15.4A.2.5 Minimum numbers of floors**

- a. The minimum number of floors above ground level for any building shall be two.
- b. Any application arising from this rule shall not be limited or publicly notified.

**15.4A.2.6 Flexibility in building design for future uses**

- a. The minimum distance between the top of the ground floor surface and the bottom of the first floor slab shall be 3.5 metres. The measurement shall be made from the ground floor surface to the bottom of the floor slab above.

## Schedule 2: Metropolitan Centre Zone Rules

- b. This rule shall not apply to buildings for residential activity or a retirement village except where they are within 10 metres of a road boundary.
- c. Any application arising from this rule shall not be limited or publicly notified.

### 15.4A.2.7 Location of onsite parking areas

- a. Parking areas shall be located to the rear of, on top of, within or under buildings; or when located on the ground floor of any building, not located within 10 metres of the road boundary.
- b. Any application arising from this rule shall not be limited or publicly notified.

### 15.4A.2.8 Screening of outdoor storage and service areas or spaces

- a. Any outdoor storage area or outdoor service spaces shall be:
  - i. located to the rear of the principal building on the site; and
  - ii. screened from any adjoining site by landscaping, fence, wall or a combination of these of not less than 1.8 metres high.
- b. Any application arising from this rule shall not be limited or publicly notified.

### 15.4A.2.9 Sunlight and outlook at boundary with a residential zone

- a. Where an internal boundary adjoins a residential zone, no part of any building shall project beyond a building envelope constructed by recession planes shown in Appendix 14.16.2 Diagram D from points 3m above ground level along all boundaries.
- b. For any part of a building above 12m in height, the recession plane under a. shall apply, unless that part of the building above 12m in height is set back from the relevant boundary as set out below:
  - i. northern boundary: 6 metres;
  - ii. southern boundary: 8 metres; and
  - iii. eastern and western boundaries: 7 metres
 Where the boundary orientation is as identified in Appendix 14.15.2 Diagram D, in which case there shall be no recession plane requirement for that part of the building above 12m in height.
- c. Any application arising from this rule shall not be limited or publicly notified.

#### Advice note:

- 1. There is no recession plan requirement for sites located in the Metropolitan Centre Zone that adjoin sites also zoned Metropolitan Centre Zone.

### 15.14A.2.10 Minimum setback from the boundary with a residential zone or from an internal boundary

- a. The minimum setback from the boundary with a residential zone, or in the case of residential activities from an internal boundary, shall be as follows:
  - i. Buildings shall be setback from the boundary of any residential zone by a minimum of 3 metres, except that where there is a shared wall with a building within a residential zone no setback is required.
  - ii. For residential activities there shall be no minimum building setback from internal boundaries other than from the boundary of any residential zone, except where a

## Schedule 2: Metropolitan Centre Zone Rules

balcony or the window of any habitable space faces an internal boundary and there is no other direct daylight available to that habitable space, then the balcony or window shall not be located within 3 metres of any internal boundary.

- iii. Any required building under i. shall contain landscaping for its full width and length and this area planted in a combination of shrubs, trees and grasses including a minimum of 1 tree for every 10 metres of boundary length capable of reaching a minimum height at maturity of 8 metres and shall not be less than 1.5 metres at the time of planting.
- iv. All landscaping within the setback shall be maintained, and if dead, diseased or damaged, shall be replaced.
- b. Any application arising from this rule shall not be limited or publicly notified.

### 15.14A.2.11 Building height

- a. The maximum and minimum height of any building shall be as follows:
  - i. The maximum height shall be 45 metres.
  - ii. The maximum height of the building base shall be 22 metres.

### 15.14A.2.12 Water supply for fire fighting

- a. Provision for sufficient water supply and access to water supplies for firefighting shall be made available to all buildings (excluding accessory buildings that are not habitable buildings) via Council's urban reticulated system in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice (SNZ PAS: 4509:2008).
- b. Where a reticulated water supply compliant with SNZ PAS:4509:2008 is not available, water supply and access to water supplies for fire fighting that is in compliance with the alternative firefighting water sources provisions of SNZ PAS 4509:2008 must be provided.
- c. Any application arising from this rule shall not be publicly notified. Limited notification, if required, shall only be to the New Zealand Fire Service Commission (absent its written approval).

### 15.14A.2.13 Building tower setbacks

- a. All parts of the building tower shall be set back from any boundary by a distance equal to 10% of the total height of the building.

### 15.14A.2.14 Maximum building tower dimension and building tower coverage

- a. The maximum horizontal dimension of any part of the building tower shall be 40m.

### 15.14A.2.15 Minimum building tower separation

- a. All parts of the building tower shall be separated from any other building tower by at least 12 metres. This rule applies to buildings on the same site, and to separate parts of the same building that may project above 22m in height.

**Schedule 2: Metropolitan Centre Zone Rules****15.14A.2.16 Wind**

- a. New buildings, structures or additions above 30 metres in height shall not result in wind conditions that exceed the following cumulative wind condition standards (Gust Equivalent Mean) more than 5% annually at ground level, within 100m of the site based on modelling:
  - i. 4 m/s at the boundary of the site street frontage for the width of the footpath;
  - ii. 6 m/s within any carriageway adjacent to the site;
  - iii. 4 m/s at public open spaces:
- b. New buildings, structures or additions greater than 30 metres in height shall not result in wind speeds exceeding 15m/s more than 0.3% annually at ground level.

**15.14A.2.17 Minimum building setback from railway corridor**

- 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 metres.
- b. Any application arising from this rule shall not be publicly notified.

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Bruce Neill **Last name:** Alexander

**On behalf of:**

**Preferred method of contact:** Email

**Postal address:** 111 Hackthorne Road

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:** 8022

**Email:** brucealecandernz@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

Bruce Alexander submission chch heritage plan 13

# Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

Gender:  Male  Female  Non-binary/another gender

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

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

*\* Required information*

Name\* Bruce Neill Alexander  
Address\* 111 Hackthorne Rd, Cashmere Postcode\* 8022  
Email brucealexandernz@gmail.com Phone no. 03-942 3277

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 Bruce Neill Alexander Date 12 May 2023 ✓

## Have your say

# Heritage Plan Change 13

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

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

Chapter 9 - Natural and Cultural Heritage

I would like to have 111 Hackthorne Road for inclusion in the heritage schedule due to its age and history

### My submission is that:\*

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

I would like to have my house included in the heritage schedule for the following reasons:

It was built in 1910 as a weekend holiday cottage, this was the first house built on Hackthorne Road. It is made of kauri weatherboard and heart rimu construction.

It has only had two owners in that time. I have been living here for 52 years since i bought it in 1970

It survived the 2011 earthquake without minimal (\$60,000) damage, mainly plaster

Extensive alterations have been made over the years.

### 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.)*

Please include 111 Hackthorne Road in the heritage schedule according to Chapter 9 Natural and Cultural Heritage

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Fiona **Last name:** McCarthy

**Organisation:** Ministry of Housing and Urban

Development

**On behalf of:**

**Preferred method of contact** Email

**Postal address:**

**Suburb:** Pipitea

**City:** Wellington

**Country:** New Zealand

**Postcode:**

**Email:** fiona.mccarthy@hud.govt.nz

**Daytime Phone:** 04 832 2594

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
Ministry of Housing and Urban Development
HUD CCC PC 14 submission



Mulder, Andrea

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From: RMA Plans <RMAPlans@hud.govt.nz>  
Sent: Friday, 12 May 2023 4:10 pm  
To: Engagement  
Cc: RMA Plans  
Subject: PC 14 submission - Ministry of Housing and Urban Development  
Attachments: HUD CCC PC 14 submission .docx; HUD CCC PC 14 submission .pdf

Kia ora,

Please find attached a submission on Plan Change 14 from Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (HUD).

The submission is in the name of our CEO, but please use this email address and my contact information for correspondence.

Ngā mihi  
Fiona

Fiona McCarthy (she/her)

Manager Urban Development Enablement | Policy and Legislation Design  
Solutions Design and Implementation

[Fiona.McCarthy@hud.govt.nz](mailto:Fiona.McCarthy@hud.govt.nz) | Phone: +64 4 832 2594 | Mobile: +64 22 079 4140  
[www.hud.govt.nz](http://www.hud.govt.nz) | Level 8, 7 Waterloo Quay, Pipitea, Wellington



He kāinga ora, he hāpori ora - our purpose is thriving communities where everyone has a place to call home.

[UNCLASSIFIED]

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## **Submission on a notified proposal for Plan Change 14 to the Christchurch District Plan under Clause 6 of Schedule 1 Resource Management Act 1991**

12 May 2023

engagement@ccc.govt.nz

**Name of submitter: Andrew Crisp, Chief Executive, Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (HUD)**

This is a submission on Plan Change 14.

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

### **HUD's role and responsibilities**

HUD leads the New Zealand Government's housing and urban development work programme. We are responsible for strategy, policy, funding, monitoring and regulation of New Zealand's housing and urban development system. We are working to:

- address homelessness
- increase public and private housing supply
- modernise rental laws and rental standards
- increase access to affordable housing, for people to rent and buy
- support quality urban development and thriving communities.

We work closely with other central and local government agencies, the housing sector, communities, and iwi to deliver on our purpose – thriving communities where everyone has a place to call home – he kāinga ora, he hapori ora.

### **Wider Context**

*The Government Policy Statement on Housing and Urban Development 2021 (GPS-HUD)*

The GPS-HUD sets a direction for housing and urban development in New Zealand. Its overarching vision is that everyone in New Zealand lives in a home and a community that meets their needs and aspirations.

The four main things it sets out to achieve are:

- **Thriving and resilient communities** – the places where people live are accessible and connected to employment, education, social and cultural opportunities. They grow and change well within environmental limits, support our culture and heritage and are resilient.
- **Wellbeing through housing** – everyone lives in a home, whether it's rented or owned, that is warm, dry, safe, stable and affordable, with access to the support they need to live healthy, successful lives.
- **Māori housing through partnership** – Māori and the Crown work together in partnership so all whānau have safe, healthy, affordable and stable homes. Māori housing solutions are led by Māori and are delivered locally. Māori can use their own assets and whenua Māori to invest in and support housing solutions.



- **An adaptive and responsive system** – Land-use change, infrastructure and housing supply is responsive to demand, well-planned and well-regulated.

*The National Policy Statement on Urban Development (NPS-UD)*

HUD has a particular interest in this Plan Change stemming from its co-lead role in developing the NPS-UD and medium density residential standards, and overseeing their implementation.

The NPS-UD aims to ensure councils better plan for growth and remove overly restrictive barriers to development to allow growth in locations that have good access to services, public transport networks and infrastructure. The NPS-UD *intensification policies* require councils to enable greater heights and densities in areas that are well-suited to growth, such as in and around urban centres and rapid transit stops.

The NPS-UD provides for qualifying matters – justified reasons to reduce heights and densities enabled.

The NPS-UD is intended to ensure New Zealand's towns and cities are well-functioning urban environments that support housing supply and affordability, accessibility to jobs and services, and emissions reduction.

*The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the Amendment Act)*

The Amendment Act was passed in December 2021 with the purpose of increasing housing supply by accelerating the implementation of the NPS-UD and enabling more medium density homes through the Medium Density Residential Standards (MDRS).

The MDRS aims to enable housing choice across Aotearoa New Zealand's main urban areas. The standards mean that up to three dwellings of up to three storeys can be developed on a site without the owner needing to apply for a resource consent, as long as all other rules and standards have been met.

The MDRS also aims to increase urban agglomeration benefits, allow for the more efficient use of existing infrastructure, and reduce urban sprawl. This then prevents the loss of the natural landscape, the expensive expansion of infrastructure networks, and compounding congestion from the car-dependent lifestyles that accompany that expansion.

While the NPS-UD is targeted in where it applies, the MDRS apply to every relevant residential zone in a Tier 1 urban environment, except where a qualifying matters applies.

*The benefits of intensification*

In recent years, HUD and the Ministry for the Environment (MfE) have commissioned a series of work to develop an evidence base to inform policy development and to support the evaluation of policies. This evidence base has been bolstered by international evidence that has considered the impacts of intensification. Reports commissioned by HUD and MfE include (but are not limited to) the following:

- The costs and benefits of urban development, 2019, MRCagney: <https://environment.govt.nz/publications/the-costs-and-benefits-of-urban-development/>
- The cost benefit analysis for the National Policy Statement on Urban Development, 2019: <https://environment.govt.nz/assets/Publications/Files/NPS-UD-CBA-final.pdf>



- The cost benefit analysis for the Medium Density Residential Standards: <https://environment.govt.nz/assets/publications/Cost-benefit-analysis-of-proposed-MDRS-Jan-22.pdf>

As a whole, this evidence base clearly shows the benefits of intensification in the form of:

- **Social benefits**, resulting from greater availability of a wide range of housing typologies in areas that are close to jobs and services. This can slow or reverse the transfer of wealth from future homeowners and renters to current property owners in areas with heavy restrictions.
- **Economic benefits**, resulting from greater productivity. *Agglomeration economies* drive productivity growth in areas where higher numbers of firms and people are located near one another, as a result of improved matching between employers and employees and higher levels of innovation (due to 'knowledge spillovers').
- **More efficient use of infrastructure**, as infrastructure costs are lower, on average, for medium density developments and developments in inner-city areas.
- **Environmental benefits** relative to greenfields development and to development further from the centre of cities. In particular, intensification is a key mechanism for reducing carbon emissions, enabling shorter commute times and efficient use of infrastructure, while continuing to meet housing and urban development needs.

This evidence shows that the benefits outlined above tend to outweigh costs and do so substantially in areas that are well-suited to development. Benefits are also widespread, longstanding and projected to grow substantially over time. Costs are real (congestion, sunlight loss, loss of views) but tend to be smaller and more narrowly focused, primarily affecting current homeowners.

As a result, modelling for both the NPS-UD intensification policies and the MDRS showed a clear net benefit. This work also highlighted that the costs of any restrictions imposed will be a reduction, to a greater or lesser extent, in the positive impacts outlined above. Benefits and costs are also shown to arise commensurately in response to development, with neither arising if development does not occur. Critically, this means that there is not a development scenario where costs outweigh benefits.

This evidence base has been well socialised with councils through written communication, workshops and the legislative process.

In its role overseeing the implementation of the NPS-UD, HUD is focused on ensuring these benefits are realised, that restrictions are only put in place where there are genuine qualifying matters that need to be managed, and that any proposed qualifying matters are supported by the level of cost benefit analysis required by the RMA.

### **Scope of Submission**

The submission is focused on the application of qualifying matters and policy 3(d) of the NPS-UD.



## The requirements for qualifying matters

### *The origins of the NPS-UD*

The NPS-UD and the Amendment Act have their origins in the Productivity Commission's 2015 report, *Using land for housing* (Report). Among the Report's findings were that planning frameworks were overly restrictive on density, and that density controls were too blunt, having a negative impact on development capacity, affordability, and innovation. The Report also commented that planning rules and provisions lacked adequate underpinning analysis, resulting in unnecessary regulatory costs for housing development.

As a response to that issue, successive Governments have enacted national policy statements to direct district councils to enable greater development capacity within our urban areas, to address the challenges identified above by the Productivity Commission.

### *Key requirements of the NPS-UD*

Policy 3 of the NPS-UD is directive. It requires district councils to enable building heights and density of urban form:

- (a) as much as possible in city centre zones, to maximise the benefits of intensification;
- (b) in metropolitan centre zones, of at least six storeys and otherwise reflecting demand;
- (c) of at least six storeys within a walkable catchment of:
  - (i) rapid transit stops; and
  - (ii) the edge of city and metropolitan centre zones; and
- (d) commensurate with the level of commercial activity and community services within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones.

Policy 6 of the NPS-UD illustrates the mindset shift that is required by this new planning paradigm. It relevantly provides that:

Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters

- (a) the planned urban build form anticipated by those RMA planning documents that have given effect to [the NPS-UD];
- (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:



- (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and
  - (ii) are not, of themselves, an adverse effect;
- [...]

The requirement to “have particular regard” to the matters in Policy 6 signifies the importance attached to those matters, and the need for them to be carefully considered and weighed in coming to a conclusion when considering submissions. In short, the changes that may result from implementation of the NPS-UD may improve the amenity of those who have (to date) been poorly served by urban planning, at the expense of existing amenity. It is also worth noting that the heights enabled through Policy 3 are just the floor (ie “at least”), and not the ceiling.

*Key features of the requirements under the Amendment Act*

The requirements introduced through amending the Resource Management Act 1991 (RMA) are similarly directive. The intent of this legislation was to enable increased and varied housing densities, types, and, ultimately, choice.

Section 77G(1) of the RMA requires territorial authorities to incorporate the MDRS in “every relevant residential zone”. Section 77G(2) requires territorial authorities to give effect to the NPS-UD, and in particular, Policy 3, in “every residential zone in an urban environment”.

The sole basis upon which a territorial authority may alter the application of the MDRS, or the building height and density requirements under Policy 3 of the NPS-UD to make them less enabling of development, is by identifying matters which qualify, through evidence and a robust cost-benefit analysis, under ss 77I through 77L. Restrictions can only apply to the extent necessary to accommodate those matters.

*The legislation requires one to shift their mindset*

In district planning processes prior to the promulgation of the NPS-UD, the starting point was the identification of matters that required protection from inappropriate subdivision, use and development. To properly give effect to the legislation, as outlined above, a new approach is required which sets intensification as the starting point. The baseline of intensification set by the MDRS and NPS-UD can be reduced only to the extent necessary to accommodate the qualifying matters that meet the strict requirements of 77I and 77J.

From HUD’s perspective, it is critical that the mindset of primarily enabling intensification is applied when considering submissions on qualifying matters and policy 3(d), in order to ensure that the legislation is implemented properly.



## **Relation to Plan Change**

### *Qualifying Matters*

We consider that this perspective and requirements must be the starting point when considering submissions on qualifying matters, especially whether restrictions are only being applied to the extent necessary to accommodate those matters.

### The Low Public Transport Accessibility Qualifying Matter (LPTAQM)

Against the context above, HUD submits that council's analysis of the LPTAQM is insufficient to meet the legal requirements of 77L. Plan Change 14 proposes to limit the extent of where the MDRS would be enabled to only near the highest-frequency bus routes and routes that connect larger commercial centres through the LPTAQM.

This qualifying matter limits the amount of feasible development capacity in Christchurch by 26,400 additional dwellings. The council's approach does not reflect the required legal approach outlined above, rather seeming to start from a position of excluding application of the MDRS first. Furthermore, using a qualifying matter means applying a static approach to a dynamic issue (the availability of public transport). It is realistic that the supply of public transport is likely to change over the duration of a plan, and also more frequently than plan variations can efficiently keep up with.

HUD submits that the characteristic that Christchurch City Council (CCC) purports makes the level of development provided by the MDRS inappropriate – distance to public transport – is not one which Parliament considered an inappropriate reason for the MDRS to apply. Unlike policy 3 of the NPS-UD which specifically referred to differing levels of intensification being enabled within walkable catchments of certain features (including rapid transit) compared to outside walkable catchments – the requirement to apply the MDRS intentionally did not contain such a link to any form of transport or other service or amenity. This was a deliberate decision as increased density better supports the financial viability of public transport and the uptake of active transport modes, such as cycling and walking.

HUD also submits that the MDRS and NPS-UD are intended to work together to enable development, rather than one restricting the application of the other.

### The Sunlight Access Qualifying Matter

HUD questions whether this qualifying matter only modifies the MDRS as little as possible to accommodate the matter the council is attempting to address. HUD notes that the height in relation to boundary rules in Auckland Council's Mixed Housing Urban zone which enabled 3 storeys buildings were considered by Ministers as a possible base for the MDRS, but not followed as they specifically did not enable a full width third storey on many sites. A larger envelope provides for a more diverse range of typologies and bulk and location design to be considered in development.



### The Airport Noise Contours

HUD submits that the panel should consider whether this qualifying matter makes the MDRS less enabling only to the extent necessary to accommodate the matter. The panel should consider whether alternative treatments may be appropriate instead of density restrictions.

### The Key Transport Corridors – City Spine Qualifying Matter

HUD submits that the panel should consider whether this qualifying matter makes the MDRS less enabling only to the extent necessary to accommodate the matter. This qualifying matter creates uncertainty for developers by imposing a restricted discretionary activity status related to undefined future plans, and decreases development capacity and feasibility.

### The Riccarton Bush Interface Qualifying Matter

HUD broadly supports the retention and protection of Riccarton Bush on environmental and cultural grounds. HUD notes that, compared to the MDRS, currently only the height limits have been reduced to manage the interface between Riccarton Bush and the surrounding houses. HUD would encourage careful consideration of any further reductions if other submissions suggest any, especially in light of Policy 6 of the NPS-UD.

### *Policy 3(d) – increased heights and densities*

Policy 3(d) of the NPS-US (written in full above) aims to maximise the benefits of intensification, including agglomeration benefits. HUD submits that CCC should go further in enabling density around existing commercial centres to maximise these benefits, by increasing the spatial extent of the following types of commercial centres by at least 200 metres:

- a. medium local centres;
- b. large local centres;
- c. town centres;
- d. large town centres.

This would also improve consistency in CCC's concept of walkability. In developing their LPTAQM, CCC used a 10 minute walk as a metric to consider what was and wasn't accessible to public transport. However, even around the largest commercial centres in Christchurch the High Density Residential Zone only extends approximately 600m (an 8 minute walk). This implies that CCC assumes people would walk further to a bus, than to a centre zone. Furthermore, the higher density zoning around the city centre, as required by policy 3(c), extends for 1.2 km, yet the next largest catchment of high density extends for only 600m. Increasing the size of the walkable catchments will maximise agglomeration benefits, and provide internal consistency within the Plan.





## Relief sought by HUD

HUD seeks the following changes to ensure that Plan Change 14 maximises this opportunity to address the current housing shortages in Christchurch including by:

1. That the following qualifying matters are deleted and the appropriate underlying zoning is applied:
  - a. Low Public Transport Accessibility Qualifying Matter.
  - b. Sunlight Access
  - c. Airport Noise Contours
  - d. Key Transport Corridors – City Spine
2. That the Panel considers whether the Riccarton Bush Interface Qualifying Matter applies restrictions only to the extent necessary to accommodate the matter.
3. Increase the walkable catchments, and therefore the associated heights and densities, of the following types of commercial centres by at least 200 metres:
  - a. medium local centres.
  - b. large local centres.
  - c. town centres.
  - d. large town centres.
4. Including such further or other relief, or other consequential or other amendments, as are considered appropriate and necessary to address the concerns set out herein.

## Hearings

HUD wishes to be heard in support of its submission. If others make a similar submission, HUD will consider presenting a joint case with them at a hearing.

aAndrew Crisp, Chief Executive, Te Tūāpapa Kura Kāinga - Ministry of Housing and Urban Development

Address for Service of person making submission:  
Te Tūāpapa Kura Kāinga Ministry of Housing and Urban Development  
Contact Person:  
Email: [RMAPPlans@hud.govt.nz](mailto:RMAPPlans@hud.govt.nz)  
Phone: Fiona McCarthy, 022 079 4140  
Postal Address: Ministry of Housing and Urban Development

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Sally **Last name:** Bransfield

**On behalf of:**

**Preferred method of contact:** Email

**Postal address:** 8 Rimu Street

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:** 8041

**Email:** sbransfield@hotmail.com

**Daytime Phone:** 0274554993

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

Sally

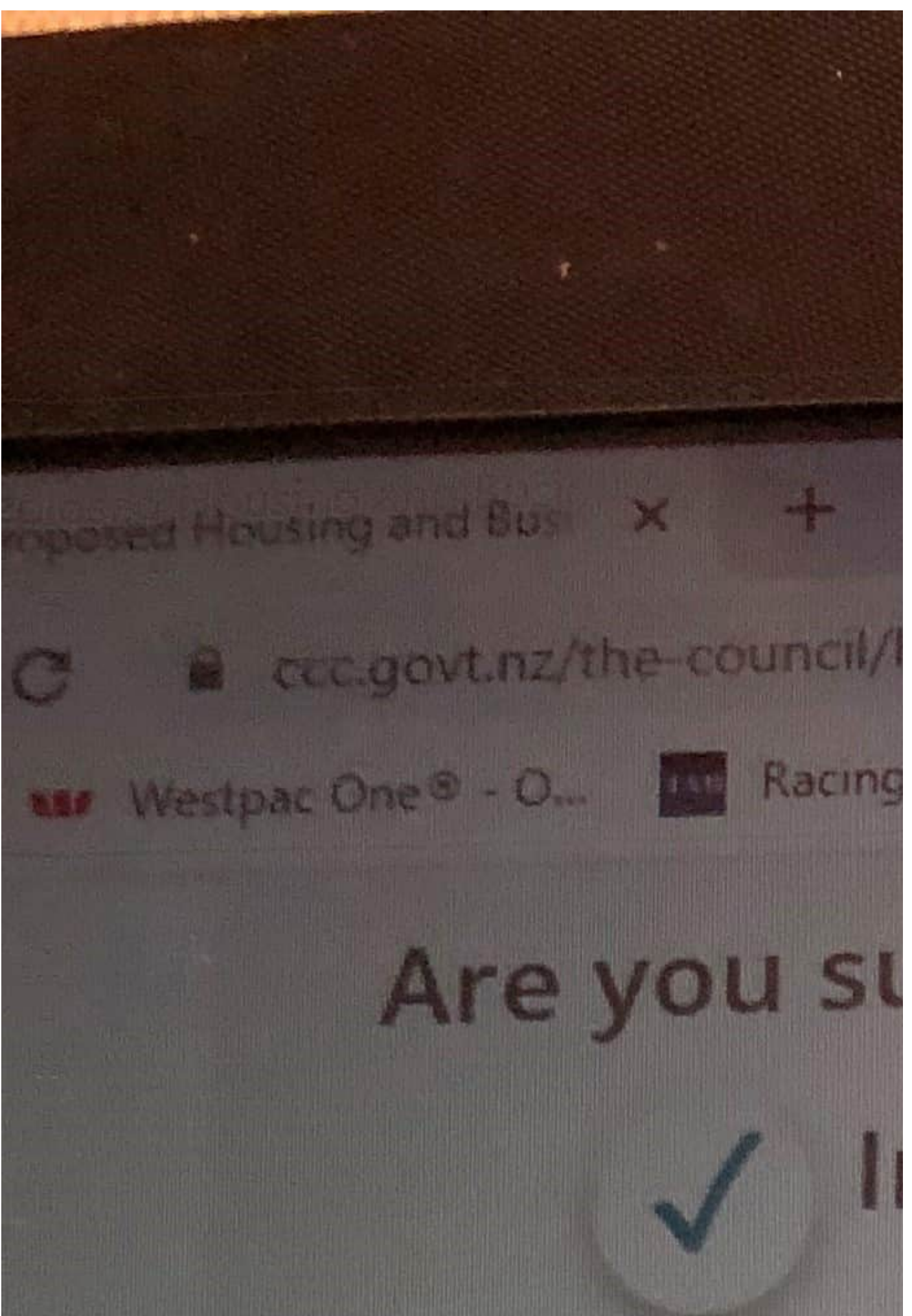
**Robson, Gina**

---

**From:** s b <sbransfield@hotmail.com>  
**Sent:** Friday, 12 May 2023 4:49 pm  
**To:** Engagement  
**Subject:** PC14

Please find attached photos. Have been advised to send to this address by CCC staff  
As unable to successfully submit after many attempts.  
Thankyou

Sally Bransfield





Proposed Housing and Bus x +

ccc.govt.nz/the-council/hav

Westpac One® - O... Racing &

method of  
of the Act)

Type in you





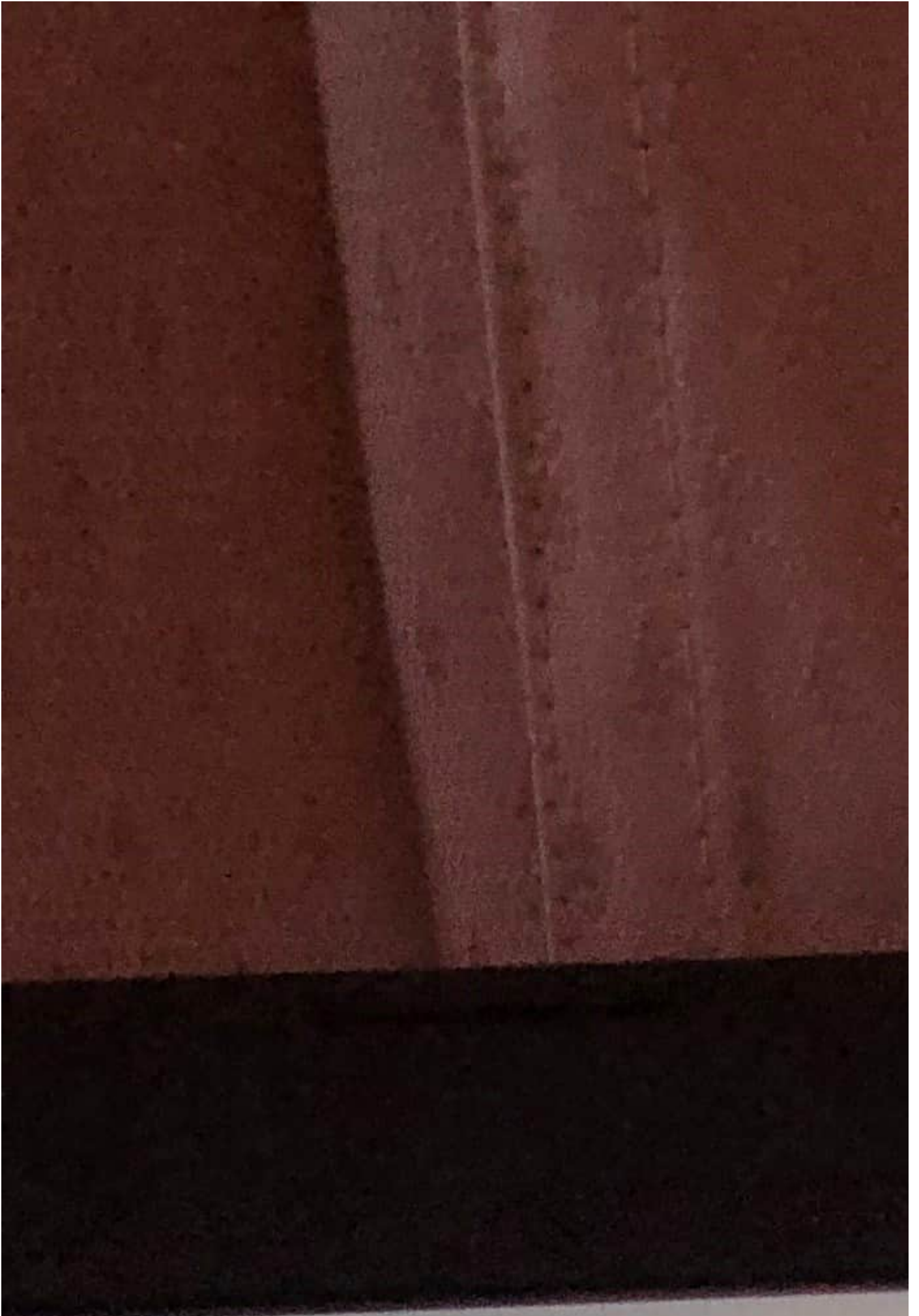


.../show/531

Buy online and sell...  Log

Section I





Sent from my iPhone

**Jackson, Andrew**

---

**From:** declan bransfield <dbransfield1@hotmail.com>  
**Sent:** Friday, 12 May 2023 4:23 pm  
**To:** Engagement  
**Subject:** Have your say  
**Attachments:** CCC.docx

Regards

Declan

Declan Bransfield Builders Ltd

0274554992

Sent from [Mail](#) for Windows 10

Declan Bransfield

8 Rimu St

Riccarton 8041

02745549982

Unable to make submission on line

Comntacted CC and advised by Rita to send submission to this address 1605pm 12/5/23

Maintain residential zone on Deans Bush Interface

all else to High Density ,Proximity to schools shops public transport routes hospitals etc

Hagley Park not affected by high rise developments

All other areas around Deans Bush to be high Density

You are creating an island in an area that should be a thriving area

I suspect that CCC is being swayed by a small group of NIMBY citizens who do not have Riccartons best intentions at heart and are instead hindering growth by preserving their little enclave

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Julie **Last name:** Robertson-Steel

**On behalf of:**

**Preferred method of contact:** Email

**Postal address:** Unit 2, 14 Bishop Street

**Suburb:** St Albans

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8014

**Email:** robertsonsteel@yahoo.co.nz

**Daytime Phone:** 0211157322

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

Julie Robertson-Steel1

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\* JULIE ROBERTSON - STEEL

Address\* 2/14 BISHOP STREET, CHRISTCHURCH Postcode\* 8014

Email robertsonsteel@yahoo.co.nz Phone no. 021 115 7322

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

Organisation's name N/A

Your role N/A

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

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

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

(a) adversely affects the environment, and

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

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

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

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

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

I do not wish to speak.

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

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

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

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

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

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

Signature 

Date 25/4/2023



## Have your say

### Housing and Business Choice Plan Change 14

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

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

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

My submission is that:\*

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

See submission attached.

I seek the following decision from the Council:\*

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

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

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

## Submission on Housing and Business Choice Plan Change (Plan Change 14)

My submission is that:


I appreciate the Council's efforts to protect the residents of Christchurch from the application of the new national standards for denser housing, and **support** the Council's proposal for a city-wide Qualifying Matter restriction to protect sunlight access for homes.

In respect of several specific provisions of the proposed changes I submit the following:

1. **The entire St Albans area between Bealey Avenue and Edgeware Road should be designated a Medium Density Residential Zone** for the following reasons:
  - This area is, and has always been, highly residential and has been regenerated since the Christchurch earthquakes as such, with many people buying residential units within the area based on the existing Council rules around intensification, sunlight provisions, etc. It is too late for them not to elect to buy into the area now because it is to become a High Density Zone with the possibility of much taller developments, and this makes it unfair for the District Plan rules to be changed so that the area is High Density at this stage.
  - My point above is evidenced by all the St. Albans residents that I have so far spoken with, making an assumption that any High Density Residential Zone wouldn't extend beyond the Four Avenues and for many, this is one of the bases on which they bought a residential property beyond the Four Avenues.
  - Many of the residential streets between Bealey Avenue and Edgeware Road are narrow and already clogged with residents' cars, as there is insufficient off-street parking. Allowing High Density Residential Zone housing intensification will further exacerbate this problem, as Christchurch is not yet at the stage where people can operate without a car in this area. Within the Four Avenues is somewhat easier, as there are more buses available and people are nearer to the Bus Interchange, but beyond the Four Avenues becomes very problematic.
  - The area within the Four Avenues provides ample opportunity for redevelopment into a High Density Residential Zone and for the foreseeable future is the area that should be concentrated on before the Council looks at extending the Zone out further.
  
2. The proposed changes in recession planes for **sunlight access** are appreciated but, from my reading of them, may still result in no ground-floor sun for over three months of the year if an adjoining property ends up with a three-storey or higher dwelling to the north of it. I believe that this is unacceptable for the following reasons:
  - Health and wellbeing: Some existing developments have units only on ground level (with separate units above) and for those people, they will be badly affected in terms of health and wellbeing, by having no access to sunlight for that length of time. Depression, in particular, can result in these circumstances and for a city that prides itself on the wellbeing benefits for its citizens of living here, rules allowing such a long period without access to sunlight in dwellings runs contrary to that. In addition, areas of homes with no exposure to sunlight for long periods and in cold temperatures may be prone to damp and mould issues, both inside and out.
  - Allowing developers to build up to 12m without increased setbacks in an area where there are still many single or lower-storey dwellings would block far too much sunlight

even with the new recession planes proposed, and I urge the Council to re-think the recession planes to allow more sunlight to adjoining dwellings.

- Fairness: As stated in (1) above, people have bought into areas based on existing Council rules and to suddenly find that a three-storey (or higher) dwelling can be built to the north of them in a residential area is not equitable or fair to those existing home owners. It is an entirely different situation where a buyer elects to buy in an apartment complex that is already built, or buys a dwelling next door to an existing building that is tall. In this regard, I support developments such as East Frame/One Central within the Four Avenues which are purpose-built as high density, residential complexes that take up larger areas of land – that is a much more appropriate way to develop high density housing.

  
JULIE ROBERTSON - STEEL

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Lloyd Barclay **Last name:** Barclay

**On behalf of:**

**Preferred method of contact:** Email

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** lloydandnickybarclay@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

Lloyd Barclay

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\* LLOYD BARCLAY

Address\* 24 WATFORD STREET Postcode\* 8052

Email lloydandnickybarclay@gmail.com Phone no. \_\_\_\_\_

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

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

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

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

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

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

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

Yes  No

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

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

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

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

I do not wish to speak.

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

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

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

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

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

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

Signature [Handwritten Signature] Date 2.5.2023

## Have your say Housing and Business Choice Plan Change 14

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

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

I AM CONCERNED THAT PROPOSED CHANGES WILL HAVE A SIGNIFICANT IMPACT ON THE CHARACTER AND QUALITY OF OUR NEIGHBOURHOOD. I BELIEVE THERE WILL BE SIGNIFICANT INFRASTRUCTURE PLACE PRESSURES AS A RESULT OF THESE CHANGES AS THEY STAND.

**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 DO SUPPORT THE NEED TO INTENSIFY HOUSING IN THE GREATER CITY AREA AS WE SHOULD NOT CONTINUE EXPANDING INTO PRODUCTIVE RURAL AREAS. MY CONCERN IS THE HEIGHT OF DEVELOPMENTS, CHEAP UNATTRACTIVE BUILDINGS AND PROVISION OF SOME FORM OF OFF STREET PARKING. SOME RULING FOR ADDITIONAL GREEN SPACE FOR FAMILIES MUST BE CONSIDERED.

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

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

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

- 1/ DEVELOPMENTS IN RESIDENTIAL AREAS ARE LIMITED TO (3) LEVELS.
- 2/ SOME PROVISIONS FOR OFF STREET PARKING
- 3/ DEVELOPMENTS ARE OF A QUALITY THAT DO NOT DETRACT FROM SURROUNDING NEIGHBOURHOODS
- 4/ GREEN SPACES BE STIPULATED AS PART OF THE CONSENTING PROCESS.

8

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Stuart **Last name:** James Irvine

**On behalf of:**

**Preferred method of contact:** Email

**Postal address:** 22A Watford Street

**Suburb:** Strowan

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8052

**Email:** stuartirvine4368@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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 b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

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

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

Additional requirements for hearing:

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

### Attached Documents

File

Stuart James Irvine

Have your say

## Housing and Business Choice Plan Change 14

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

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

### 1. INFRASTRUCTURE

Section 14.2.8.5 Policy - Infrastructure servicing for developments. (c) Ensure that developments are serviced with all required infrastructure in an effective + efficient manner

Section 14.2.8.6 - Integration + connectivity (c) Avoid significant adverse effects on existing businesses, rural activities or infrastructure.

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.)

Infrastructure pressures in our region of Stowman are already excessive. St Andrew's College has 10,500 pupils + a staff in excess of 500. Car parking + necessary automobile activity is already excessive! The historic + beautiful space that has blessed this community along with its myriad of water ways is already threatened by increased rainfall affecting stormwater + wastewater levels + potential flooding

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.)

The HRZ (HRZ) proposed for the Stowman area west of Papanui Rd are, without question, inappropriate and must be revised to MRZ at the most. CCC must not allow any increase to the existing dysfunctional + unsafe infrastructure overload in our special community!

Thank you.



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\* STUART JAMES IRVINE

Address\* 22a WATFORD ST, CHRISTCHURCH Postcode\* 8052

Email stuartirvine4368@gmail.com Phone no. \_\_\_\_\_

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

Organisation's name N/A.

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

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

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

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

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### 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 5.5.23.

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Douglas Corbett **Last name:** Corbett

**On behalf of:**

**Preferred method of contact:** Postal

**Postal address:** 17 Glenora Place

**Suburb:** Hornby

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8042

**Daytime Phone:** 0272567672

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

I do not wish to speak but if others make a similar submission, will consider presenting a joint case with them at the hearing.

### Attached Documents

File

Douglas Corbett

Have your say

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

**RECEIVED**

- 5 MAY 2023

Hornby Service Desk

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\* Douglas Corbett  
 Address\* 17 Elenora Place Hornby Postcode\* 8042  
 Email dougandkath@extra.co.nz Phone no. 0272567672

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
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\* 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 Douglas Corbett Date 05-05-2023

Have your say

## Housing and Business Choice Plan Change 14

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

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

Loss of Sun  
 Degrading our area  
 Devaluation of our properties  
 Increase of Crime and no room to park cars on the street as these proposed units have no garages  
 Infrastructure can not cope now

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.)*

oppose the specific proposed provisions  
 I wish to have them amended

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.)*

amendments should only allow not higher than two storeys high and built in the central city only

Have your say

## Heritage Plan Change 13

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

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

Loss of Sun  
Loss of privacy  
Loss of trees

My submission is that:\*

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

Reason for views is we in Hornby have a special Community of mainly single storey buildings which is unique to our Community. We do not want to be a ghetto. Our Community does not have the infrastructure to cope with all this extra housing, sewer, storm water and traffic. Our roads are congested enough.

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.)

amendments PC14 and PC13

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Rogen **Last name:** Lough

**On behalf of:**

**Preferred method of contact:** Postal

**Postal address:** Flat 2, 10 Mayfair Street

**Suburb:** Riccarton

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8011

**Daytime Phone:** 0272481488

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
RogenLough

Save time and do it online

[ccc.govt.nz/haveyoursay](http://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\* ROGER LOUGH.  
 Address\* 2/10 MAYFAIR STREET CHRISTCHURCH Postcode\* 8011  
 Email LOUGH.MAYFAIR.CMCH@XTRA.CO.NZ Phone no. 0272 481488

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 25/4/23.

Have your say

## Housing and Business Choice Plan Change 14

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

RESIDENTIAL INTENSIFICATION RULE CHANGES.

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.)

WHILE WE SUPPORT THE DRANS AVENUE PARCINET SOCIETY (DPAS) PROPOSED CHANGES WE WOULD LIKE TO SUGGEST THAT THE EXISTING EX SALL YARDS RESIDENTIAL SITE TO THE SOUTH EAST OF MAYFAIR STREET BE RETAINED AND DEVELOPED AS A GARDEN AREA PROVIDING.

- a) DIRECT CYCLE / PEDESTRIAN ACCESS BETWEEN HAGEN PARK, DRANS AVENUE AND TOWN JUNCTION.
- b) A BUFFER BETWEEN THE HIGH DENSITY MIXED RESIDENTIAL DEVELOPMENT OF THE SALL YARDS SITE AND THE RESIDENTIAL DEVELOPMENT BETWEEN DRANS AVENUE AND THE RAILWAY MVR.

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.)

PLAN CHANGES TO BE MADE TO ACCOMMODATE THE ABOVE PROPOSAL.



## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Helen **Last name:** Adair Denize

**On behalf of:**

**Preferred method of contact:** Postal

**Postal address:** 96 Chapter Street

**Suburb:** St Albans

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8052

**Daytime Phone:** 021555449

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
Helen A Denize

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\* Helen-Adair Denige

Address\* 96 Chapter Street, St Albans, Christchurch Postcode\* 8052

Email helen@adair.co.nz Phone no. 021 555 449

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 Helen-Adair Denige Date 22.04.2023

attached sheet cover both Plan Changes 13 + 14

# 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.)*

[Blank lined area for response]

**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.)*

[Blank lined area for response]

**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.)*

[Blank lined area for response]

8

April 22 2023

Re Plan changes 14 & 13.

I note this is a consultation document and that the area circled on page 9 is described as Significant in terms of proposed changes.

I live within this area.

I can understand why six stories may be necessary to house a new St Georges Hospital Complex but I cannot see any advantage in allowing 3 storey developments in the surrounding residential streets.

This neighbourhood used to prize itself as a SAM, some of the character has been eroded due to the demolition of houses in the area and the construction of new ones, however the number of new builds is not significant enough to change the character of the Merivale Suburban precinct.

The area is currently Zoned Residential One which allows for two storey dwellings, which is consistent with the housing development in the area since it began.

The area is however pocketed with TC2 & TC3 sites, a complexity exacerbated by the St Albans Stream which flows through it, and liquefaction which occurred during the major seismic earthquakes, which has left the substrata honeycombed.

Allowing triple stories on smaller allotments will make way for developers to capitalise on high density housing. Quotable Value focusses on Land Value and subjugates improvements if they are not modern. There is an high risk of developers dictating the design of new builds in future making it difficult for individuals to demonstrate design individuality as the market will sell to the highest bidder.

Nor does this area have sufficient roading to support higher density living. It is already severely congested, especially on Papanui road.

I would submit that the nature of the Garden City is likely to be compromised with the proposal to incorporate high density living in this area.

H-A Denize  
96 Chapter Street  
Christchurch 8052

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Robina **Last name:** Dobbie

**On behalf of:**

**Preferred method of contact:** Postal

**Postal address:** PO Box 21413

**Suburb:**

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8140

**Daytime Phone:** 021702289

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

Robina Dobbie

# 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 *New Zealander*

*\* Required information*

Name\* Robina Debbie (Rebbie)  
 Address\* PO Box 21413, Edgware, Christchurch Postcode\* 8143  
 Email RobinaDebbie@yahoo.com Phone no. 021-702289

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

Organisation's name TBA  
 Your role Co-ordinator

**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 <sup>response</sup> submission on Plan Change 14 *Definitely + combined rights*
- 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. *will be provided prior to presentation*

Signature of <sup>responder</sup> 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 10/5/2023  
8/5/2023

Have your say

## Housing and Business Choice Plan Change 14

The specific provisions of the plan change that my <sup>response</sup> submission relates to are as follows:\*

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

- New and modified qualifying matters - one missing
- New & modified residential controls - Minimum 2-storey building height in High Density Residential Zone.
- Zoning changes - modified high-density zoning around Commercial Centre.

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 believe we need to add on a qualifying matter for the CBD and other vulnerable land due to the dangers from earthquakes (esp. Alpine fault). Intensification is dangerous for our city as was ~~proven~~ demonstrated by the impact on our city during 2011/12 and the lives of CCC residents.
- Why a minimum two-storey building height? Forced not choice
- Zoning changes may work for other cities. We need Christchurch to be safe as it will be pivotal when the Alpine Fault ruptures - full presentation will be made to justify this.

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.)

To stop housing intensification for safety reasons and to stabilise CC as it is pivotal when the Alpine Fault ruptures.

To add the Alpine Faultline as a qualifying matter

A full powerpoint presentation will be provided to council to justify this viewpoint with supporting facts.

Consideration of discussion points of local CCC residents.

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Maureen **Last name:** Kerr

**On behalf of:**

**Preferred method of contact:** Postal

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Daytime Phone:** 0274177510

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

I do not wish to speak but if others make a similar submission, I will consider presenting a joint case with them at the hearing.

### Attached Documents

File

Maureen 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

*Emil*

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\* MAUREEN KERRAddress\* 57 WATFORD STREET STROMAN CHRISTCHURCH Postcode\* 8052Email maureen.kerr@xtra.co.nz Phone no. 0274177510

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 Maureen Kerr Date 7 -05-2023

## Have your say

# Housing and Business Choice Plan Change 14

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

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

**My submission is that:\***

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

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

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

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

## 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.)

- 14.2.7.2 HIGH DENSITY LOCATION
- 14.2.8.5 INFRASTRUCTURE SERVICING
- 14.2.8.6 INTEGRATION AND CONNECTION
- 14.6.2 BUILT FORM STANDARDS
- 14.2.4.2 HIGH QUALITY MEDIUM DENSITY RESIDENTIAL DEVELOPMENT
- 7.2.1.2 HIGH TRIP GENERATING ACTIVITIES
- 7.2.1.5 DESIGN OF CARPARKING AREAS

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 STRONGLY OPOSE THE INTRODUCTION OF HIGH DENSITY RESIDENTIAL DEVELOPMENTS WITHIN THE AREA PAPANUI ROAD TO WATFORD STREET.

- PROTECT THE EXISTING HOUSING ENVIRONMENT OF HIGH QUALITY CHARACTER HOMES
- TRAFFIC CONGESTION ALREADY A CONCERN ALONG WATFORD STREET EXACERBATED BY ST ANDREWS COLLEGE, TENNIS CLUB AND THOROUGHFARES FROM BLIGHS ROAD TO NORMANS ROAD
- CARPARKING A CONTINUAL PROBLEM - WILL BE INTENSIFIED WITH HARD SITES WITH LIMITED OR NO PARKING
- INFRASTRUCTURE ALREADY SATURATED - FLOODING PREVALENT

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.)

- REVISE PROPOSAL TO INTRODUCE HIGH DENSITY RESIDENTIAL ZONING IN THIS SUBURB.
- PROTECT AND MAINTAIN SPECIAL CHARACTER AND QUALITY OF EXISTING HOMES IN THIS LOCATION.
- ADDRESS EXISTING ISSUES OF TRAFFIC CONGESTION, CARPARKING, FLOODING LIQUEFACTION
- CONSIDER IMPACT OF HOUSING AFFORDABILITY AND CLIMATE CHANGE AS IT APPLIES TO STROMAN.

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Dawn **Last name:** E Smithson

**On behalf of:**

**Preferred method of contact:** Postal

**Postal address:** 87 Normans Road

**Suburb:** Strowan

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8052

**Daytime Phone:** 0275552045

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

I do not wish to speak but if others make a similar submission, I will consider presenting a joint case with them at the hearing.

### Attached Documents

File

Dawn E Smithson

Have your say

## Housing and Business Choice Plan Change 14

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

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

- 1) Infrastructure - Chapter 14 - In particular  
 Section 14.2.8.5 Infrastructure services, developments  
 " 14.2.8.6. Integration & connectivity

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.)

Currently there are already major pressures on infrastructure in the Stronachan community, especially in the vicinity of St Andrew's College.

- - Demand for on street parking spaces far exceeds number of spaces
- There is increasing congestion especially morning ~~at~~ and at 3pm, double parking, hovering in your driveways. =
- Current stormwater & wastewater are already overloaded which causes flooding & unhealthy storm & wastewater systems.

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 strongly ask that Council (REVISE) the high density Residential Zone HRZ, which is proposed for ~~the~~ eastern blocks of Stronachan from Normans Rd to Blighs Rd, to Medium Density Residential zone (MRZ) to prevent the increase of current unsafe transport issues & unhealthy stormwater issues.

RECEIVED  
12 MAY 2023  
Ema

# 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\* DOWN E SMITHSON

Address\* 87 Noimans Rd. Postcode\* 8052

Email strowan@xtra.co.nz Phone no. 027555 2045

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 [Handwritten Signature] Date 9/5/23

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Susanne **Last name:** Antill

**On behalf of:**

**Preferred method of contact** Email

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Email:** mailto:susanneantill@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.

### Consultation Document Submissions

Chapter 14 Residential **Points:** 70.1

Support

Oppose

Seek Amendment

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

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

**My submission is that**

We totally oppose the new planning rules in the Christchurch District Plan.

These proposals would substantially alter the character of Christchurch for residents of Christchurch and detrimentally affect our quality of life.

It reflects a top down management by a foreigner with globalist allegiances.

The general wording is non specific platitudes. It could mean anything.

1. We oppose replacing existing residential zones in the city with two new ones – a medium density zone and a high density zone.

What rationale? Are you planning for massive overseas population immigration into Christchurch for a 15 minute smart city when the birth rate of Christchurch residents is low, particularly after the mandated experimental, untested jobs on young New Zealanders which has probably sterilized many of them.

2. We oppose increased height limits of buildings. Christchurch is on an aquifer flood plane and subject to earthquakes. This is totally crazy.

3. What does this sentence mean: “ Special rules for housing and business to better reflect our city’s environment and climate”?

4. What does this sentence mean:” Heritage that should be protected, with a number of new buildings, items and interiors added to the Schedule of Significant Historic Heritage.”?

This does not make sense.

Are you trying to pull a fast one? And are you going to destroy anything that you do not deem to be of historical significance? Will you destroy the character of Christchurch the way you deconstructed and destroyed the Christchurch Library?

There is no mention here of 5G.

We totally oppose denser housing which will actually cut sunlight from residences.

We oppose 15 minute cities which will curtail our freedom

We oppose smart cities which will be detrimental to our health

We oppose 5G towers which pose a significant threat to both our freedom and our health

We oppose mass overseas immigration into Christchurch which is a globalist agenda not a Christchurch citizens agenda.

This council does not listen to what residents want and runs rough shod over the opinions and wishes of Christchurch residents. For example the Harewood Road Cycleway which was opposed by the majority of Harewood residents.

Susanne Antill

Janice Antill

---

#### 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:** Scott **Last name:** Tindall

**On behalf of:**

**Preferred method of contact:** Email

**Postal address:** 15 Dunluce Place

**Suburb:** Hornby

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8042

**Email:** Scott.Tindall@laminex.co.nz

**Daytime Phone:** 0212448179

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:

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

### Consultation Document Submissions

Chapter 14 Residential **Points:** 71.1

- Support
- Oppose
- Seek Amendment

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

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

**My submission is that**

I oppose the proposal to include the Hornby area as high density housing. We live in a cul-de-sac and believe that the proposed changes would affect our lifestyle and community in a negative way. Already we are seeing medium housing density increasing and its a eye sore in an area where family's live in predominantly single level 1970s dwelling the apartment housing is an eyesore and not acceptable in our community. The infrastructure is already under pressure and there are no plans in place to improve this, example and single toilet dwelling has been removed and replaced with 4 dwellings each with 2 toilets! On top of that each site has limited parking which leads to cars parking on the street which makes them more susceptible to being interfered with. Thanks you for taking time to review my response I look forward to a positive outcome for our community.

---

Attached Documents

File
Scott Tindall email

**Cui, Aviva**

---

**From:** Scotty Tindall (Laminex) <Scott.Tindall@laminex.co.nz>  
**Sent:** Tuesday, 16 May 2023 3:45 pm  
**To:** Engagement  
**Subject:** RE: Submission opposing high density housing

Hi Aviva

Please see below my answers to your questions in blue –

Thanks for your help.

Kind regards

**Scott Tindall**

Operations Manager Lower North Island & South Island  
 7 Gallagher Drive, Hornby, Christchurch 8042  
 T: +64 3 379 8640 | F: +64 3 366 7608 | M: +64 21 244 8179  
 www.laminexnewzealand.co.nz




---

**From:** Engagement <engagement@ccc.govt.nz>  
**Sent:** Tuesday, 16 May 2023 2:44 PM  
**To:** Scotty Tindall (Laminex) <Scott.Tindall@laminex.co.nz>  
**Subject:** FW: Submission opposing high density housing

**Caution:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

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Kia ora Scott,

Thank you so much for your feedback on PC14. I apologise for the difficulties that you encountered with our system.

Can you please answer the questions below? Then I can lodge your submission to the correct consultation form. *The plan change consultation has a compulsory form (this is a requirement of the relevant central government legislation), which means there are additional sections that you need to complete to provide feedback.*

1. **Trade competition** and adverse effects: **could not**
2. **Gain an advantage in trade competition** through this submission: **I am not**  
*(Note: if you are a person who could gain an advantage in trade competition through the submission, your right to make submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resources Management Act 1991).*
1. Would you like to present your submission in person at a **hearing?** **Yes**
2. If others, make a similar submission I will consider **presenting a joint case** with them at the hearing (do not tick if you would not consider a joint case). **Yes**

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

## Aviva Cui

### Engagement Assistant

Communications and Engagement

Pronouns: she/her



03 941-6844 | 027 367 1828



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



Te Hononga Civic Offices, 53 Hereford Street, Christchurch



PO Box 73016, Christchurch 8154



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



---

**From:** Jane West <[jane@jwest.co.nz](mailto:jane@jwest.co.nz)>

**Sent:** Friday, 12 May 2023 8:29 pm

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

**Subject:** Fwd: Submission opposing high density housing

Hi there

Here's a submission that didn't quite get through online.

Thanks

Jane

Jane West

Friend of Submitters

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---

**From:** Scotty Tindall (Laminex) <[Scott.Tindall@laminex.co.nz](mailto:Scott.Tindall@laminex.co.nz)>

**Sent:** Friday, May 12, 2023 8:26:36 PM

**To:** Jane West <[jane@jwest.co.nz](mailto:jane@jwest.co.nz)>

**Subject:** Submission opposing high density housing

Hi Jane

Please see our submission below for the CCC, we had trouble trying to enter it online.

I oppose the proposal to include the Hornby area as high density housing. We live in a cul-de-sac and believe that the proposed changes would affect our lifestyle and community in a negative way. Already we are seeing medium housing density increasing and its a eye sore in an area where family's live in predominantly single level 1970s dwelling the apartment housing is an eyesore and not acceptable in our community. The infrastructure is already under pressure and there are no plans in place to improve this, example and single toilet dwelling has been removed and replaced with 4 dwellings each with 2 toilets! On top of that each site has limited parking which leads to cars parking on the street which makes them more susceptible to being interfered with. Thanks you for taking time to review my response I look forward to a positive outcome for our community.

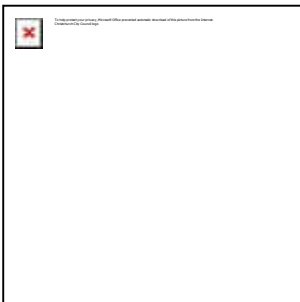
Kind Regards

Scott & Rachael Tindall  
15 Dunluce Pl, Hornby 8042  
0212448179

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## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Henry **Last name:** Sullivan

**Organisation:** Oyster Management Limited

**On behalf of:**

**Preferred method of contact** Email

**Postal address:**

**Suburb:**

**City:** Auckland

**Country:** New Zealand

**Postcode:** 1143

**Email:** Henry.Sullivan@minterellison.co.nz

**Daytime Phone:** 0275550829

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

Henry Sullivan - Oyster Ltd Email Submission

**Jackson, Andrew**

---

**From:** Henry Sullivan <Henry.Sullivan@minterellison.co.nz>  
**Sent:** Friday, 12 May 2023 2:55 pm  
**To:** Engagement  
**Cc:** Bianca Tree  
**Subject:** Oyster Management Limited - Submission on Plan Change 14 [MERWZN-MERWLIB.FID729381]  
**Attachments:** Oyster Management Limited - Submission on Plan Change 14(901324800.1).pdf

Kia ora

We act for Oyster Management Limited (**Oyster**).

Please see **attached** a submission on behalf of Oyster on Plan Change 14 to the Christchurch District Plan.

We would appreciate if you can please confirm receipt of this submission.

Ngā mihi  
Henry

**Henry Sullivan**

Solicitor

T +64 9 353 9942M +64275550829

henry.sullivan@minterellison.co.nz

**MinterEllisonRuddWatts**

minterellison.co.nz | LinkedIn



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**OYSTER MANAGEMENT LIMITED SUBMISSION ON PLAN CHANGE 14 TO THE  
CHRISTCHURCH DISTRICT PLAN**

To: Christchurch City Council  
53 Hereford Street  
Christchurch  
8154

Engagement@ccc.govt.nz

**Name of Submitter:** Oyster Management Limited

**Address:** c/- MinterEllisonRuddWatts  
PO Box 105249  
AUCKLAND 1143  
Attention: Bianca Tree

bianca.tree@minterellison.co.nz  
henry.sullivan@minterellison.co.nz

**Introduction**

1. Oyster Management Limited (**Oyster**) appreciates the opportunity to make a submission on Plan Change 14 to the Christchurch District Plan (**PC14**). PC14 was notified by Christchurch City Council (**Council**) on 17 March 2023.
2. Oyster's comments on PC14 and relief sought are set out in full in the table at **Appendix A** to this submission. Oyster supports PC14 to the extent that it enables a well-functioning urban environment.
3. Oyster could not gain an advantage in trade competition through this submission.

**Background to Oyster and its Christchurch properties**

4. Oyster is a commercial property and fund manager that manages a portfolio of office, retail, large format retail, and industrial properties throughout New Zealand. Oyster manages approximately \$2 billion in assets.
5. Oyster's office assets comprise of commercial business parks and CBD offices. Its retail assets include regional shopping centres, outlet centres,



suburban convenience centres, large format retail, and supermarkets, and its industrial assets comprise of logistic, manufacturing, and warehouse facilities in established industrial areas.

6. In Christchurch, Oyster's portfolio includes 229 Tuam Street, which is occupied by Kathmandu (**Site**). The Site is shown in the planning maps attached as **Appendix B** to this submission.
7. Oyster also manages the Dress Smart site at 411 Main South Road, Hornby, which is owned by Lendlease. This submission does not relate to the Dress Smart site.

#### **Reasons for relief sought**

8. The specific provisions subject to this submission and reasons for the relief sought are set out in the table at **Appendix A** to this submission.
9. In addition to the specific reasons in Appendix A, Oyster supports the proposed changes to the provisions in PC14 where those changes:
  - (a) give effect to the objectives and policies of the National Policy Statement on Urban Development 2020 (**NPS-UD**);
  - (b) contribute to well-functioning urban environments;
  - (c) are consistent with the sustainable management of physical resources and the purpose and principles of the Resource Management Act 1991 (**RMA**);
  - (d) meet the requirements to satisfy the criteria of section 32 of the RMA;
  - (e) meet the reasonably foreseeable needs of future generations; and
  - (f) are consistent with sound resource management practice.

#### **Relief sought**

10. The relief sought by Oyster is set out in the table at **Appendix A** to this submission.

11. In addition to the specific relief sought in Appendix A, Oyster seeks such additional or consequential relief to give effect to the matters raised in this submission.
12. Oyster wishes to be heard in support of its submission.
13. If others make a similar submission, Oyster will consider presenting a joint case with them at a hearing.

**DATED** this 12<sup>th</sup> day of May 2023

**Oyster Management Limited** by its  
solicitors and duly authorised agents  
MinterEllisonRuddWatts



---

**Bianca Tree**

**Address for service of submitter**

Oyster Management Limited c/- MinterEllisonRuddWatts  
P O Box 105249  
AUCKLAND 1143  
Attention: Bianca Tree / Henry Sullivan

Telephone No: (09) 353 9700

Fax No. (09) 353 9701

Email: bianca.tree@minterellison.co.nz  
henry.sullivan@minterellison.co.nz

## Appendix A – Submission on behalf of Oyster Management Limited on Plan Change 14 to the Christchurch District Plan (PC14)

Chapter / Sub-part	Specific provision / matter	Position	Submission and reasons	Relief sought
1. PC14 planning maps	As shown in Appendix B the block bordered by Tuam Street, Madras Street, Lichfield Street, and Manchester Street ( <b>Block</b> ), which includes the Site, is proposed to be included in the Central City Mixed use Zone (South Frame) zone.	Oppose	Oyster opposes the inclusion of the Block in the Central City Mixed use Zone (South Frame) zone.  Oyster considers that the Block should be rezoned to Cite Centre Zone (or alternatively to Central City Mixed Use zone) because the Block is contiguous with those zones and those zones will better give effect to the direction in the NPS-UD to provide sufficient development capacity to meet the expected increase in demand for business land in Christchurch.	Rezone the Block to City Centre zone.  Alternatively, rezone the Block to Central City Mixed Use zone.
2. Central City Maximum Building Height Planning Map	As shown in Appendix B, the Block is currently within the 28m Central City Building Height Overlay under the Operative Christchurch District Plan  In the PC14 Central City Maximum Building Height Planning Map (see Appendix B) the Block is included in the 21m Central City Building Height Overlay.	Oppose	Oyster seeks greater height for the Site and other sites in the Block.  Oyster considers that it is not appropriate to reduce the Maximum Building Height that applies to the Block because the NPS-UD directs that the Council must provide sufficient development capacity to meet the expected increase in demand for business land. To give effect to this direction, Oyster considers that it is appropriate to provide for greater height in the Block.  The appropriate height will depend on what zoning is applied to the site:  1. If the Block is rezoned to City Centre zone, it is appropriate to apply the 90m Central City Building Height Overlay to the Block because the Block is contiguous with the area where the 90m Central City Building Height Overlay is proposed.  2. Alternatively, if the block is rezoned to Central City Mixed Use Zone, or remains Central City Mixed Use Zone (South Frame), it is appropriate that the 32m Central City Building Height overlay is applied to the Block because the Block is contiguous with the area to the east that is subject to the proposed 32m Central City Building Height Overlay.	Amend the Central City Maximum Building Height Overlay map to:  1. Apply the 90m Central City Building Height Overlay to the Block if the Block is included within the City Centre zone; or  2. Apply the 32m Central City Building Height overlay to the Block if the block is rezoned Central City Mixed Use Zone, or remains Central City Mixed Use Zone (South Frame).
3.	Rule 15.13.1.2.C1	Oppose	Oyster seeks that new buildings, external alterations to existing buildings, or the use of any part of a site not occupied by a building are permitted activities within the Central City Mixed Use Zone (South Frame), provided that the relevant standards, including the Building Height Standard, are complied with.	Delete Rule 15.13.1.2.C1
4.	Rule 15.13.1.3.RD1	Oppose	Oyster considers that providing for these activities as permitted activities better gives effect to the direction in the NPS-UD to provide sufficient development capacity to meet the expected increase in demand for business land in Christchurch.	Delete Rule 15.13.1.3.RD1
5. Central City Mixed Use Zone (South Frame)	Rule 15.13.1.3.RD5	Oppose in part	Oyster opposes the discretionary activity status for an activity that exceeds the maximum height for building base.	Amend Rule 15.13.1.3.RD5 as notified to provide:  Any activity listed in Rule 15.13.1.1 P1 to P156 and Rule 15.13.1.3 RD1 to RD4 and RD6 that does not meet one or more of the built form standards in Rule 15.13.2, <del>except 15.13.2.1(a)(i)(b)</del> , unless otherwise specified.
6.	Rule 15.13.1.4.D2	Oppose		Delete Rule 15.13.1.4.D2
7.	Standard 15.13.2.1 Building Height	Support in part  Oppose in part	Oyster supports the Building Height Standard to the extent that the maximum height of a building is 32m, or the height identified in the Central City Maximum Building Height planning map (if applicable).  Oyster opposes the maximum height for building base and seeks that it is removed. The height limit on a building base is an additional and unnecessary restriction on building height.	Retain Standard 15.13.2.1(a)(i)(a)  Delete Standard 15.13.2.1(a)(i)(b)

	Chapter / Sub-part	Specific provision / matter	Position	Submission and reasons	Relief sought
8.	Central City Mixed Use Zone	Rule 15.12.1.3.RD2	Oppose in part	Oyster opposes the discretionary activity status for an activity that exceeds the maximum height for building base.	Amend Rule 15.12.1.3.RD2 as notified to provide:  Any activity listed in Rule 15.12.1.1 P1 to P20 that does not meet one or more of the built form standards in Rule 15.12.2, <del>except 15.12.2.2(b)</del> , unless otherwise specified.
9.		Rule 15.12.1.4.D2	Oppose		Delete Rule 15.12.1.4.D2
10.		Rule 15.12.1.3.RD5	Oppose	Oyster seeks that new buildings and external alterations to existing buildings are permitted activities within the Central City Mixed Use Zone (South Frame), provided that the relevant standards, including the building height standard, are complied with.  Rule 15.12.1.3.RD5 effectively sets a 17m height limit. The height limit is more appropriately set by the Building Height Standard at 15.12.2.2(a), with reference to Central City Maximum Building Height planning map (if applicable).	Delete Rule 15.12.1.3.RD5
11.		Standard 15.12.2.2 Building Height	Support in part Oppose in part	Oyster supports the Building Height Standard to the extent that the maximum building height is 32m, or the height identified in the Central City Maximum Building Height planning map (if applicable).  Oyster seeks that the maximum height of 17 metres for the building base is removed. The height limit on a building base is an additional and unnecessary restriction on building height.	Retain Standard 15.12.2.2(a) Delete Standard 15.12.2.2(b)
12.	City Centre Zone	Rule 15.11.1.2.C1	Oppose	Oyster seeks that new buildings, external alterations to existing buildings, or the use of any part of a site not occupied by a building are permitted activities within the City Centre zone, provided that the relevant standards, including the Building Height Standard, are complied with.	Delete Rule 15.11.1.2.C1
13.		Rule 15.11.1.3.RD1	Oppose	Oyster considers that providing for these activities as permitted activities better gives effect to the direction in the NPS-UD to provide sufficient development capacity to meet the expected increase in demand for business land.	Delete Rule 15.11.1.3.RD1
14.		Rule 15.11.1.3.RD5	Support	Oyster supports the restricted discretionary activity status for activities that do not comply with built form standards, including the building height standard.	Retain Rule 15.11.1.3.RD3
15.		Rule 15.11.1.4.D1	Oppose in part	Oyster opposes the discretionary activity status for an activity that exceeds the maximum height for a building base or the maximum road wall height standard.  The height limits on a building bases and road walls are additional and unnecessary restrictions on building height.	Amend Rule 15.11.1.4.D1 as notified to provide:  Any activity that does not meet one or more of built form standards in Rules 15.11.2.11(a)(i)(B), (a)(ii), (a)(iii) and (a)(iv)(B) (Building Height) <del>and/or 15.11.2.12 (Maximum Road Wall Height)</del> unless otherwise specified.
16.	Standard 15.11.2.11 Building Height	Support in part	Oyster supports the Building Height standard to the extent that the maximum building height is 90m.	Retain Standard 15.11.2.11(a)(i)(A)	
		Oppose in part	Oyster seeks that the maximum height of 28m for the building base is removed. The height limit on a building base is an additional and unnecessary restriction on building height.	Delete Standard 15.11.2.11(a)(i)(B)	
17.	Standard 15.11.2.12 Maximum road wall height	Oppose	Oyster opposes the Maximum road wall height standard. Limiting height of the road wall is an additional and unnecessary restriction on building height.	Delete 15.11.2.12	

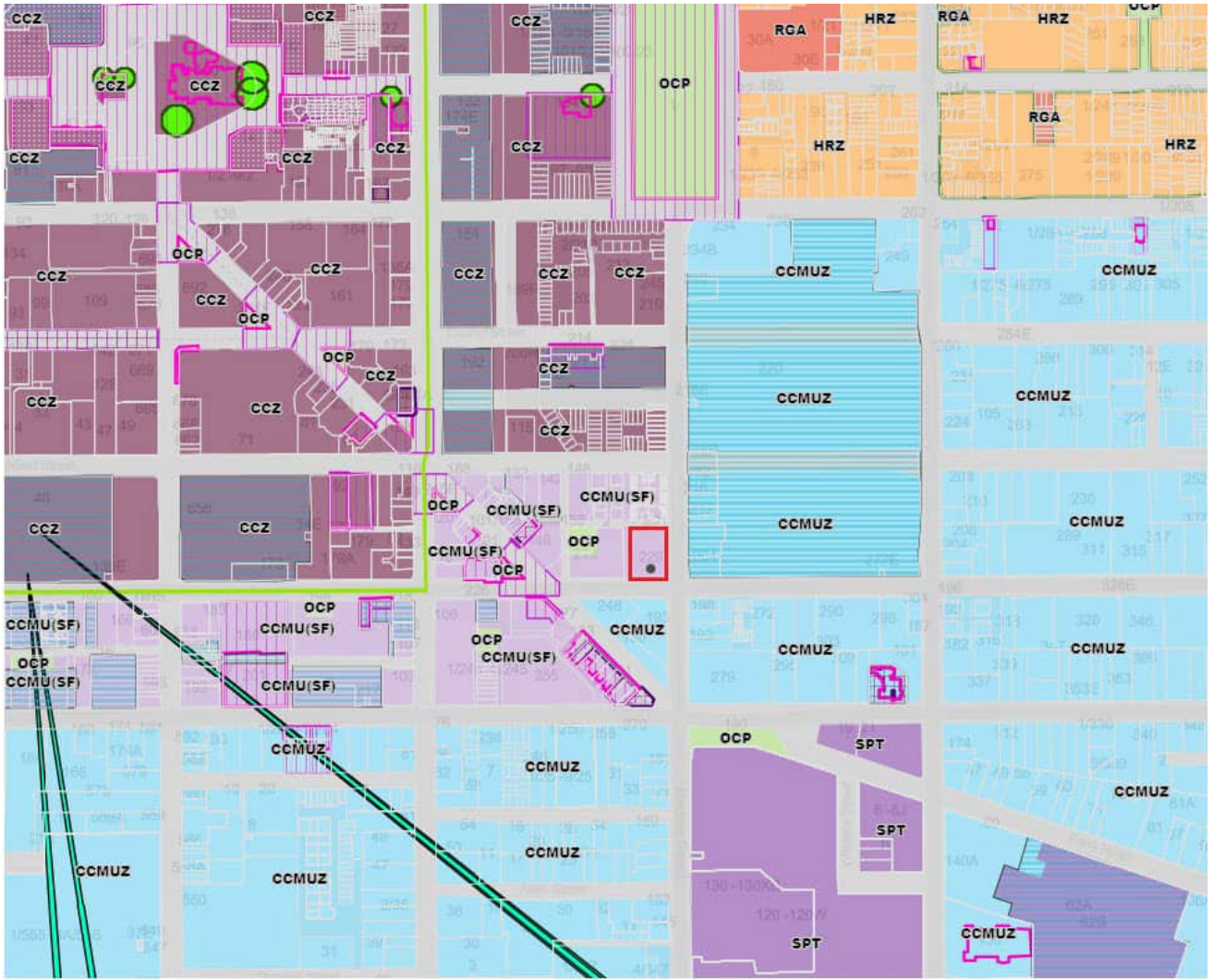
Appendix B – Planning maps

Operative Christchurch District Plan map – 229 Tuam Street



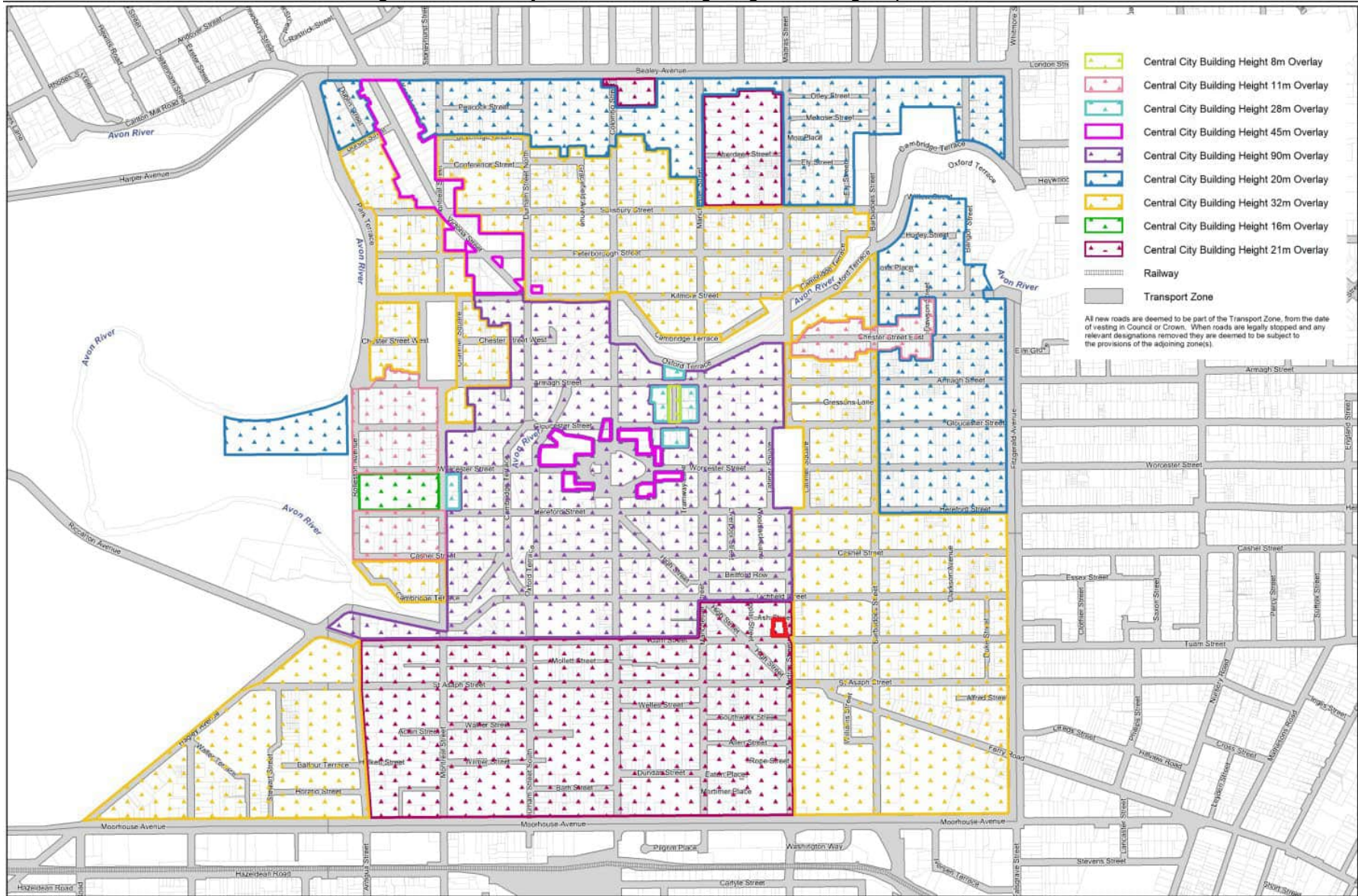
- CSE Commercial Central City (South Frame) Mixed Use Zone
- Central City Building Height 28m Overlay

Plan Change 14 planning map – 229 Tuam Street

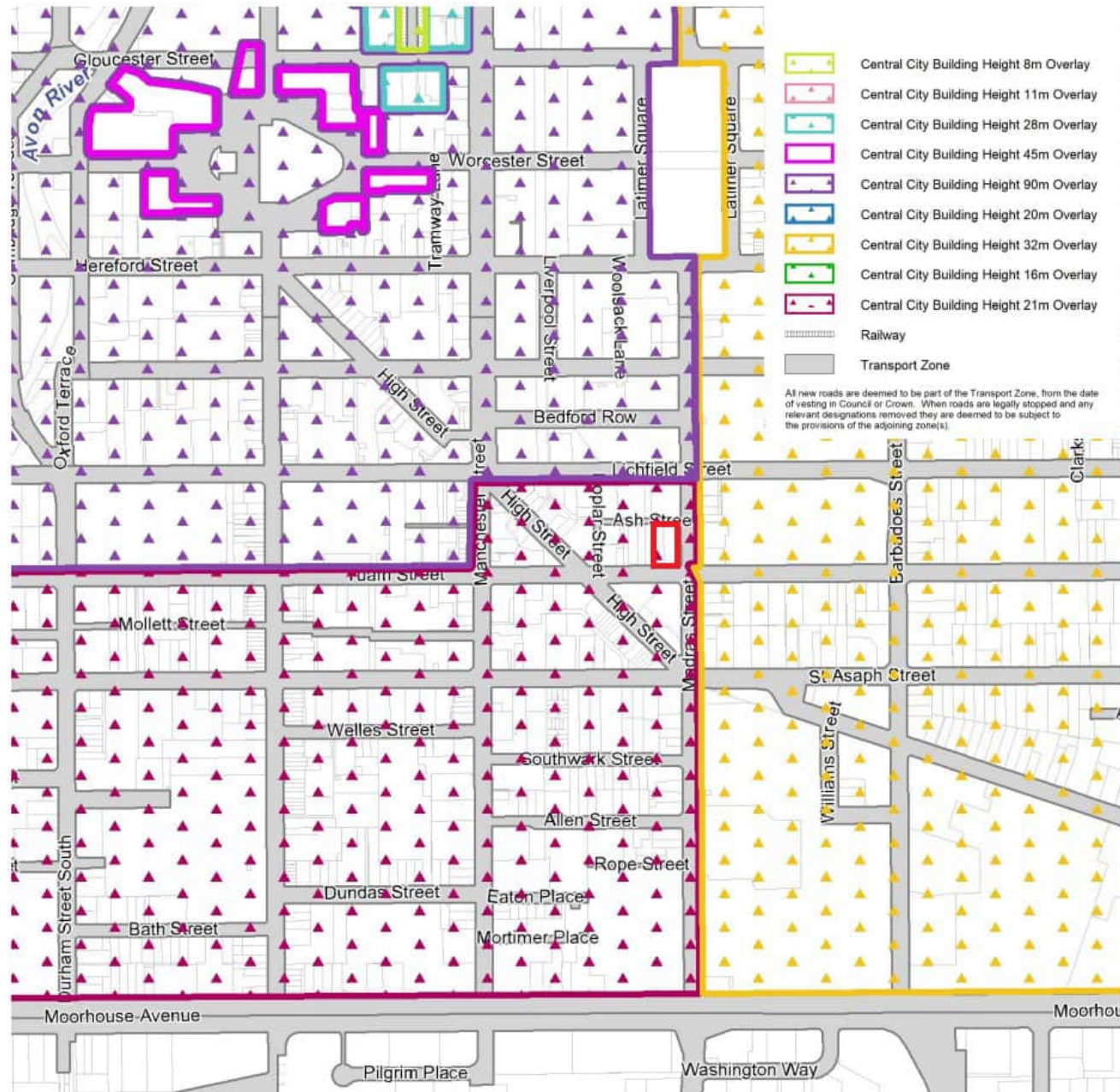


- CCMUZ Central City Mixed Use Zone
- CCMUZ SF Central City Mixed Use Zone (South Frame)
- CCZ City Centre Zone

Plan Change 14 Central City Maximum Building Height Planning Map – 229 Tuam Street



- Central City Building Height 8m Overlay
  - Central City Building Height 11m Overlay
  - Central City Building Height 28m Overlay
  - Central City Building Height 45m Overlay
  - Central City Building Height 90m Overlay
  - Central City Building Height 20m Overlay
  - Central City Building Height 32m Overlay
  - Central City Building Height 16m Overlay
  - Central City Building Height 21m Overlay
  - Railway
  - Transport Zone
- All new roads are deemed to be part of the Transport Zone, from the date of vesting in Council or Crown. When roads are legally stoppped and any relevant designations removed they are deemed to be subject to the provisions of the adjoining zone(s).





## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** David **Last name:** Lawry

**On behalf of:**

**Preferred method of contact:** Email

**Postal address:**

**Suburb:** RD6

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 7676

**Email:** 143walk143@gmail.com

**Daytime Phone:** 0272348118

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

12052023083834

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\* DAVID LAWAY

Address\* 500 GALDHURST ROAD RD6 CHRISTCHURCH Postcode\* 7676

Email 143WALK143@gmail.com Phone no. 0272348117

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 D. Laway Date 11/5/2023

## Have your say

### Housing and Business Choice Plan Change 14

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

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

Qualifying MATTERS including Air Noise contours

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.)

As per attached documentation

I seek the following decision from the Council:\*

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

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

That Air Noise contours not be allowed as a  
Qualifying Matters to effectively negate any  
ability to provide the council predicted need  
for 40,000 new houses.

More specifically the 50 dBA Ldn air noise contour

Remedies as per attached report



## Plan Change 14 Submission

### By David Lawry:

Christchurch City Council (CCC) is predicting the need for 40,000 new houses in Christchurch over the next 30 Years.

- 1) CCC studies have identified large tracts of land that are unfit for housing development due to sea 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 foot hills 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 owned company's such as Christchurch International Airport (CIAL) and Lyttelton Port. These failings extend into the very body that is supposed to provide the needed governance, Christchurch City Holding Corporation (CCHL). The fact that CCHL's 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 major conflict of interest 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 altogether 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 existing 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 Air Noise residential activity avoidance contour, specifically the 50 dBA Ldn air noise Contour. This noise level equates to 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 in 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 régime 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 requirement to investigate industrial noise pollution handing this over to a CIAL housed committee. CCC noise control personnel 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 Ldn 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 50 dBA. 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 current 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 operations 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, CEO 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 millions 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 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 CCC the tail being wagged.

### **THE SOUGHT REMEDIES**

- 1) That the 50dBA Ldn 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 administered revaluation of the existing air noise contours using airport total future capacity. Is the air noise contour régime 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?

  
D.M. LAWRY

**Jackson, Andrew**

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**From:** Jongmoon Jeon <hornbycopyplus@gmail.com>  
**Sent:** Friday, 12 May 2023 8:44 am  
**To:** 143walk143@gmail.com; Engagement  
**Subject:** Please find the attach  
**Attachments:** 12052023083834.pdf

Plan change 14 consultation submission from David Lawry.

Please don't reply to me. I am just a man from a copy centre.

Please contact5 David directly.

Thank you

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Laura **Last name:** Stewart

**Organisation:** Daresbury Ltd

**On behalf of:**

**Preferred method of contact** Email

**Postal address:** PO Box 2510

**Suburb:**

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8140

**Email:** Laura.Stewart@chapmantripp.com

**Daytime Phone:** 033530393

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

Daresbury Submission Email

**Jackson, Andrew**

---

**From:** Laura Stewart <Laura.Stewart@chapmantripp.com>  
**Sent:** Friday, 12 May 2023 4:57 pm  
**To:** Engagement  
**Cc:** Jo Appleyard; Lucy Forrester  
**Subject:** Submission on proposed Housing and Business Choice Plan Change (PC14)  
**Attachments:** PC14 Submission - Daresbury Limited.pdf

Good afternoon,  
Please find **attached** submission on behalf of Daresbury Limited in relation to PC14.  
Ngā mihi | Kind regards

LAURA STEWART (she/her)

LEGAL ADMINISTRATOR

**Chapman Tripp**

D: +64 3 353 0393

[www.chapmantripp.com](http://www.chapmantripp.com)

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## 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: Daresbury Limited

- 1 This is a submission on the proposed Heritage Plan Change 14 (*PC14*) to the Christchurch District Plan (the *District Plan*).
- 2 Daresbury Limited could not gain an advantage in trade competition through this submission.
- 3 Daresbury Limited's submission relates to the whole of PC14. The specific relief sought by Daresbury Limited is set out at **Appendix 1** and elaborated on below.
- 4 Daresbury Limited wishes to be heard in support of the submission.
- 5 If others make a similar submission, Daresbury Limited will consider presenting a joint case with them at a hearing.

**DARESBUY HOUSE**

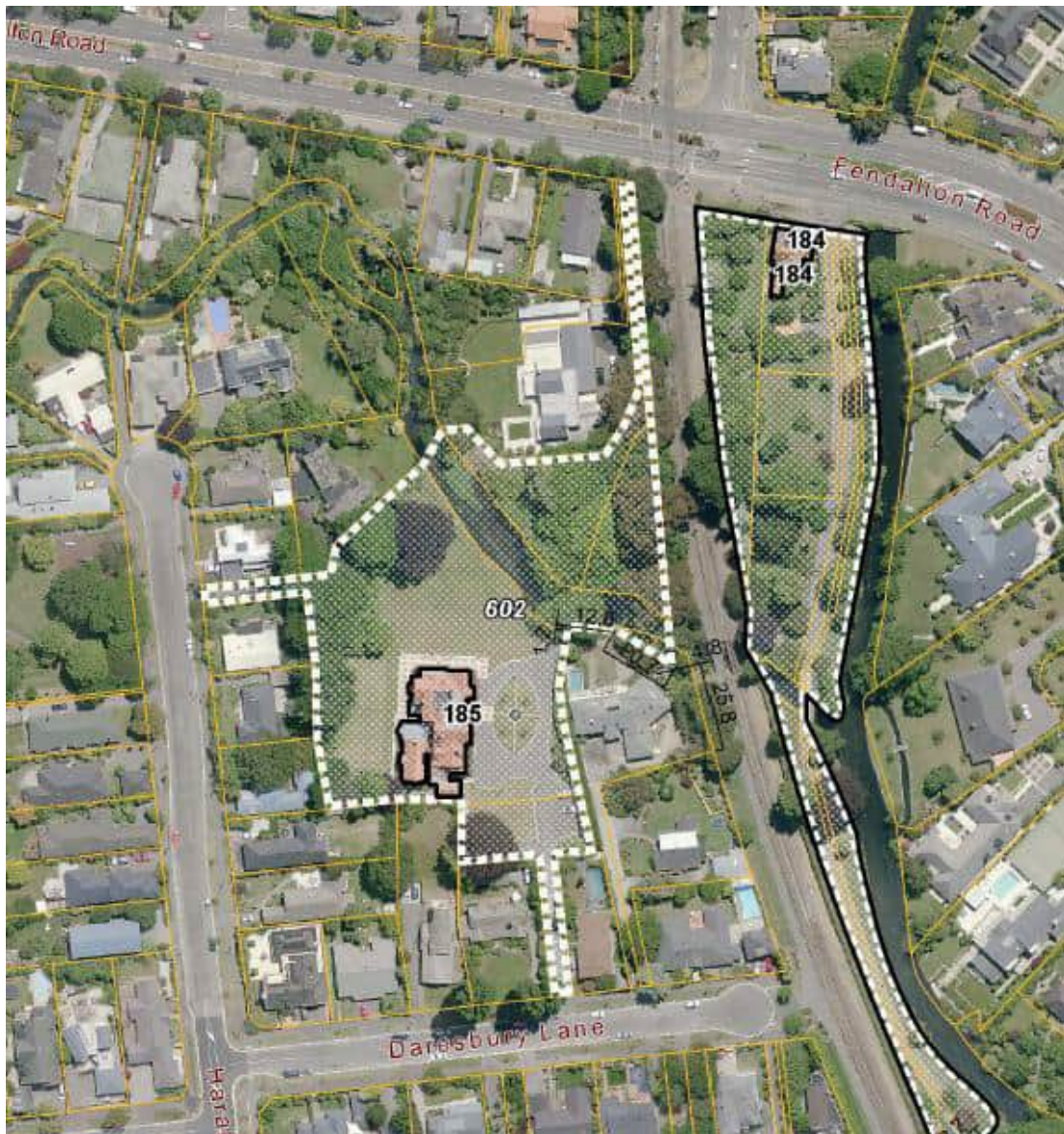
- 6 Daresbury Limited owns land located within Fendalton Road, Daresbury Lane, and Harakeke Street as shown below:



**Figure 1:** Approximate location of site shown in red

### **Heritage items and settings**

- 7 That land is covered by a heritage setting (heritage setting number 602) and includes a heritage item (Daresbury House – heritage item number 185). The extent of the heritage item and setting is shown below:



**Figure 2:** Map showing location of heritage item 185 and heritage setting 602

- 8 Daresbury House was once a significant heritage homestead but has been heavily damaged by the Canterbury earthquakes and has sat in limbo since 2011.
- 9 Since acquiring the site on an 'as is where is' basis from the previous owner, Daresbury Limited has commissioned detailed engineering, quantity surveying, and heritage reports to examine whether Daresbury House can be economically restored in a manner that is sensitive to its heritage values. The findings of these reports is that first, restoration is simply not economically feasible, and second the extent of such works would result in the loss of significant heritage fabric such that the resultant building would largely constitute a replica rather than an authentic restoration.
- 10 The extensive repair work that would be required to make the building structurally sound effectively requires destruction of the remaining heritage fabric of the

building. The building is dangerous, well below Building Code standards, and is not inhabitable.

- 11 Much of its heritage features are lost. Repairing the building so that it can be viably used and bringing it up to Building Code requirements will result in even further loss of heritage fabric (due to the scale and extent of the structural engineering work needed) and will be so expensive that it is economically unviable. Daresbury House's heritage status is considerably diminished and can no longer be considered significant. This building should no longer be included on the Schedule.
- 12 The heritage setting associated with Daresbury House is extensive – on both the north and south sides of the Waimairi Stream. Subdivision consent has been granted for that land north of the Waimairi Stream, the works associated with the subdivision are now complete and the titles are on the market. As noted above, Daresbury House has been extensively earthquake damaged and no longer has significant heritage values. This heritage setting should therefore be removed in its entirety.
- 13 The scope of PC14 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.
- 14 PC14 provides a good opportunity to review the heritage listings in the District Plan, and provide for the removal of some of the listed items so that they may be demolished where appropriate and consistent with Policy 9.3.2.2.8.
- 15 Daresbury Limited therefore seeks that:
  - 15.1 Daresbury House (Heritage Item 185) be removed from the Schedule of Significant Historic Heritage in Appendix 9.3.7.2 of the District Plan; and
  - 15.2 Associated Heritage Setting 602 be removed from the same.

#### **Significant and other trees**

- 16 The Site already contains a number of listed individual significant trees in the District Plan. The District Plan already provides a set of provisions for the protection of such trees.
- 17 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.
- 18 The 'qualifying matter trees' proposed for the Site are opposed. 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.

### **Financial Contributions Policy**

- 19 The proposed tree canopy cover and financial contributions provisions are unworkable and unreasonable.
- 20 The provisions are difficult to understand and create considerable uncertainty. For example:
- 20.1 If trees are retained over and above the 20% cover threshold will a financial credit be provided to the applicant?
- 20.2 It is not clear who would be qualified to undertake the assessment of the canopy cover.
- 20.3 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.
- 20.4 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?
- 20.5 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.
- 21 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?
- 22 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.
- 23 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.
- 24 The cost implications of not achieving tree cover are considerable and, given Daresbury Limited does not consider the 20% cover is achievable, will add further to development costs that are then passed onto purchasers.

- 25 The implications of this proposed policy are significant from an economic perspective and must be adequately justified by the Council. As it stands, Daresbury Limited 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 Daresbury Limited by its solicitors and authorised agents  
Chapman Tripp



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Jo Appleyard  
Partner  
12 May 2023

Address for service of submitter:

Daresbury Limited  
c/- Jo Appleyard / Lucy Forrester  
Chapman Tripp  
Level 5, PwC Centre  
60 Cashel Street  
PO Box 2510  
Christchurch 8140  
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	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.
5	Definition of 'Reconstruction'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for additional forms of reconstruction.	Retain as proposed.
6	Definition of 'Relocation'	Oppose	The submitter opposes the deletion of the exclusions in (a) and (b) that otherwise sensibly exclude temporary relocation or realignment works.	Retain status quo.
7	Definition of 'Repairs'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for additional forms of repairs.	Retain as proposed.
8	Definition of 'Restoration'	Supports	The amended definition provides greater clarity and certainty.	Retain as proposed.
9	8.9 Rules-Earthworks	Support	The amended provisions in rule 8.9 are generally appropriate.	Retain as proposed.
10	Policy 9.3.2.2.3 - Management of scheduled	Oppose	The amendments to clause (a)(ii) of this policy are opposed. This change inappropriately shifts the focus of the plan away from providing for ongoing use and adaptive re-use of heritage items, towards more rigid	Retain status quo.

	historic heritage		<p>preservation and protection. This can have the perverse outcome of preventing the retention of heritage buildings by preventing owners (particularly private owners) from using and maintaining heritage items in ways that are practical and financially feasible.</p> <p>The amendments to clause (b)(i) 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>	
11	Policy 9.3.2.2.8- Demolition of scheduled historic heritage	Oppose	<p>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.
12	Rule 9.3.4.1.1 (P9/8) Permitted activities	Oppose	<p>The deletion of P9 is opposed. There are many heritage buildings in Christchurch which are still in a state of disrepair and are significantly damaged as a result of the Canterbury earthquakes. It is premature to</p>	Retain status quo.

			remove these rules and standards, which sensibly provide specific guidance for heritage buildings that have been earthquake-damaged.	
13	Matters of discretion 9.3.6.1(a)	Oppose	<p>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.</p> <p>There are many heritage buildings in Christchurch which are still in a state of disrepair and are significantly damaged as a result of the Canterbury earthquakes. It is premature to remove these rules and standards, which sensibly provide specific guidance for heritage buildings that have been earthquake-damaged.</p>	Retain status quo for 9.3.6.1(a).
14	Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items	Oppose	For the reasons stated in the covering submission, the listing of Daresbury House (heritage item 185) and associated setting (heritage setting 602) is inappropriate. Accordingly, this listing should be deleted.	Delete Heritage Item 185 and Heritage Setting 602 regarding Daresbury House from Appendix 9.3.7.2.
15	Appendix 9.3.7.4 Heritage item and heritage	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	Retain the status quo.

	setting exemptions		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.	
16	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.
17	General/all Sub Chapter 6.10A Tree Canopy Cover and Financial Contributions	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.
18	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?	
19	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>	
20	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>	
21	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</p>	



			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.	
22	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.	
23	Policy 6.10A.2.1.2	Oppose	For the same reasons expressed in regards to the submission points above, the policy is opposed.  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.	
24	Policy 6.10A.2.1.3	Oppose	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	

			<p>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>	
25	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>	
26	6.10A.4	Oppose	<p>The rules are opposed in their entirety for the reasons expressed above.</p>	
27	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,</p>	

			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.	
28	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>	
29	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>	
30	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.	
31	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.
32	General / all - Sub Chapter 9.4 Significant and Other Trees  Including: 9.4.1 (c) Introduction; Policy 9.4.2.2.3 Tree Protection; 9.4.3(a) & (f) how to interpret and apply the rules; and 9.4.4. Rules	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.

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Philippa **Last name:** Rutledge

**On behalf of:**

**Preferred method of contact:** Email

**Postal address:** 44A Wairarapa Terrace,

**Suburb:** Merivale

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8014

**Email:** pnrutledge2002@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.

Additional requirements for hearing:

### Attached Documents

File

R Rutledge Submission Email

**Jackson, Andrew**

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**From:** Philippa Rutledge <pnrutledge2002@hotmail.com>  
**Sent:** Friday, 12 May 2023 3:24 pm  
**To:** Engagement  
**Subject:** Housing and Business Choice Plan Change 14 - personal submission

**Required Information:**

**Name:** Philippa N Rutledge

**Address:** 44A Wairarapa Terrace, Merivale ,Christchurch 8014

I could not gain an advantage in trade competition through this submission and I would wish to be heard in support of it.

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

Qualifying matters:

Support

Sunlight Access as being a qualifying matter - based on recession planes providing Christchurch residents with equivalent solar heating as those in Auckland rather than merely sunlight hours a section 5 RMA health and well being matter;

Addition of Stormwater Infrastructure capacity as a qualifying matter for the MRZ – a section 5, 6(a) and 77I(a) matter.

**My submission is that:**

Re Sunlight Access - the Council's proposal seeks to achieve 'an equitable outcome of MDRS standards in a Christchurch context.' by providing equivalent sunlight access. that means that for 3 months of the year groundfloor apartments/single story dwellings will be without any sunlight.

However Christchurch is a much colder city in winter so loss of sunlight during the coldest months will have a much higher impact on heating costs than it does in Auckland. Further Christchurch is a largely flat city meaning shading is predominantly determined by building height and proximity. Finally single storey/groundfloor apartments are more likely to be occupied by those who have mobility issues.

These people are the least likely to be able to afford the additional heating costs imposed by the loss of sunlight for the coldest 3 months of the year.

To achieve the 'equitable outcome of MDRS standards in a Christchurch context' in the context of ground floor residents need more sunlight to achieve equivalent solar heating benefits in a colder climate. Sunlight access recession planes need to be based on providing equivalent solar energy to ground floor dwellings in Christchurch (Climate zone 5) as in Auckland (climate zone 1) as per Technical Report – Residential Recession Planes in Christchurch.

Stormwater Infrastructure – the Consultation document acknowledges the limitation on growth imposed by old infrastructure -including stormwater. Existing rainfall is increasing in intensity making stormwater management more vital than ever. The post-quake rebuild has resulted in considerable intensification of housing in existing city residential neighbourhoods. Large sections have been subdivided and smaller sections have had rebuilds which cover much more of the section. In both cases permeable gardens and vegetation have disappeared to be replaced by larger structures and impermeable patios, driveways. This results in much higher stormwater runoff. To the streets and then streams, creeks. Unlike the new areas that have been developed there has been no upgrade of the

older stormwater infrastructure in areas like mine to cope. Further streams which are used to discharge stormwater into - such as the Wairarapa - had their beds raised by liquefaction reducing their capacity to absorb stormwater flows. Resulting in the gutters overflowing quickly, and the stream rising fast. On 11 May 2023 18mm fell in the city over an 8 hour period. This is not intense nor prolonged rainfall. Nevertheless the Wairarapa Stream was at the top of the lowest bank by 10 am and there was numerous street flooding from overflowing street culverts in many parts of the city. In some places over half the road.

If the existing stormwater drains have a designation under 77I(g) - this would assist the Council to give effect to the designation by ensuring adequate capacity and maintenance for houses connecting to the SW drain. It is also a 77I(a) [s6(a) matter] - natural character of water includes water quality and quantity, and stormwater discharges carry contaminants and alter natural flow.

Intensified development which results in increased stormwater discharge in areas of the MRZ where the stormwater infrastructure has not been upgraded within the last 20 years should be a qualifying matter. The NPS-UD 3.5 requires that local authorities must be satisfied that infrastructure to service the development is available. Where this infrastructure is over 20 years old this is clearly not the case. Climate change will make the adequacy of stormwater infrastructure even more important.

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

The Sunlight Access recession planes be designed to ensure Christchurch residents living in climate zone 5, during the winter months receive equivalent solar energy to those living in climate zone 1. In MRZ qualifying matters – include stormwater infrastructure that has not been upgraded within the last 20 years.

The plan change is subject to Part 2 in the usual way, and as such the health and well-being of people in s5 should not be diminished as a result of stormwater discharges or loss of sunlight access.

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Alan **Last name:** Ogle

**On behalf of:**

**Preferred method of contact:** Email

**Postal address:** 43 Matai Street

**Suburb:** Riccarton

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8011

**Email:** alan@ogle.nz

**Daytime Phone:** 021454046

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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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

Email from A and R Ogle

SUBMISSION ON PROPOSED HOUSING AND BUSINESS CHOICE PLAN CHANGE A R Ogle 12May23



**Jackson, Andrew**

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**From:** Alan Ogle <alan.ogle@gmail.com>  
**Sent:** Friday, 12 May 2023 2:41 pm  
**To:** Engagement  
**Subject:** Proposed Plan Change 14 Housing and Business Choice: Submission from A & R Ogle  
**Attachments:** SUBMISSION ON PROPOSED HOUSING AND BUSINESS CHOICE PLAN CHANGE A & R Ogle 12May23.docx

**Attention Engagement Team**

Apologies, but the attachment to the email sent below was poorly formatted and difficult to print.

I would be grateful if could remove the earlier attachment from your records and replace it with the updated submission attached to this email.

Many thanks

Alan & Robyn Ogle

\*\*\*\*\*

Attention Engagement Team

I have tried submitting this document via your website for the last hour, but have struck problems each time I try to add an attachment!

As advised by phone, please find attached our (my wife & I) submission.

Should there be any issues regarding the format or eligibility of the submission, please come back to as soon as possible.

Kind regards

Alan Ogle

--  
\*\*\*\*\*

Alan Ogle  
Email: [alan@ogle.nz](mailto:alan@ogle.nz)  
Ph 03 3482795 or 021454046

## **SUBMISSION ON PROPOSED HOUSING AND BUSINESS CHOICE PLAN CHANGE (PC14)**

### **Submitter Details**

**First names:** Alan & Robyn Last name: Ogle

**Preferred method of contact:** Email

**Postal Address:** 43 Matai Street

**Suburb:** Riccarton

**Country:** New Zealand

**Post Code:** 8011

**Email** [alan@ogle.nz](mailto:alan@ogle.nz)>

**Daytime Phone:** 021 454 046

**Ages:** 76 & 72

**Gender:** M, F

**Ethnicity:** NZ European

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

We are 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 competition.

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

No - I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

We seek Amendments and the following decisions from the Council in the following areas as identified by the Submissions from The Riccarton Bush Kilmarnock Residents' Association dated 2 May2023.

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

### **1- FAILURE TO PROPERLY ASSESS SOCIAL IMPACTS**

We submit the plan change should be reviewed once a proper social impact assessment has been completed.

### **2- SEEKING A RE-DESIGNATION OF THE RICCARTON CENTRE**

We submit Riccarton should be a Town or Neighbourhood Centre, not a Large Town Centre.

### **3- SUNLIGHT PRESERVATION: SEEKING AMENDMENT TO THE QUALIFYING MATTER**

We submit the Sunlight Qualifying Matter should be more conservative than proposed.

#### **4- THE RICCARTON BUSH INTERFACE AREA (RBIA: SEEKING AMENDMENT TO THE QUALIFYING MATTER**

We submit the Kauri Cluster should not be disaggregated or dismantled, and all areas referred to in WSP's Putaringamotu Riccarton Bush Heritage Landscape Review (recommended for inclusion in the RBIA) should be limited to 2-storeys and remain Residential Suburban density.

Likewise, those sites on the north side of Ngahere St and in the area between the Avon River and Kahu Rd should also be included in the RBIA, and retain their Residential Suburban zoning.

#### **5- RICCARTON COMMERCIAL/RESIDENTIAL TRANSITION ZONE: A NEW QUALIFYING MATTER**

The commercial area north of Riccarton Rd in the Riccarton centre should be height-restricted to a height that is appropriate given the proximity of low-rise residential dwellings immediately to the north.

#### **6- THE AIRPORT NOISE INFLUENCE ZONE: SEEKING AMENDMENT TO THE QUALIFYING MATTER**

We submit the properties at 34, 36, 36A, 38, 40, 44, 46, and 48 Kahu Rd, should, for reason and consistency, all be included in the Airport Noise Influence Zone.

#### **7- JANE DEANS CLOSE: A NEW QUALIFYING MATTER**

We submit Jane Deans Close should retain its current zoning of Residential Suburban Density Transition [RSDT] which provides for low to medium density residential housing.

#### **8- MATAI STREET WEST: A NEW QUALIFYING MATTER**

We submit both sides of Matai St West from Straven Rd east to the railway line, Including the area north to the Avon River, should be a Qualifying Matter restricting further residential intensification.

#### **9- RE-EVALUATING WALKING DISTANCES & 6-STOREY ZONES**

We submit the walking distances to Riccarton centre boundaries (which we understand the legislation states defines the extent of high density 6-storey residential zones) be reconsidered based, not on distance, but on time taken to walk to key amenities in the centre zone.

#### **10- ON TREES**

We submit:

1. Protections for trees, and incentives for planting more trees, should be part of the changes proposed in PC14.
2. Any financial contributions made to compensate for tree removal should be required to be spent in the area where trees are removed to, at least, replace what was there with equivalent planting.

## **11- AREAS SUBJECT TO FREQUENT SURFACE FLOODING: A NEW QUALIFYING MATTER**

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

## **12- ESTABLISHING A PLANNED PUTARINGAMOTU-RICCARTON PRECINCT: A NEW QUALIFYING MATTER**

We submit, in the absence of a properly assessed plan for intensification and development in Riccarton, the entire area represented by the Riccarton Bush Kilmarnock Residents' Association should be designated a Qualifying Matter, with current zonings maintained as agreed in the Christchurch Replacement District Plan Review of 2015, pending a comprehensive planning review.

### **Our additional submission is that:**

After attending recent meetings of the Riccarton Bush Kilmarnock Residents' Association, we now fully support their 36 page submission dated 2 May 2023. In addition, as residents in Matai Street West we particularly support matters raised on pages 21 to 24 concerning Matai Street West and the need for re-evaluating walking distances and 6 story zones. We particularly hold deep further concerns on the following:

1. PC 14 fails to recognise that since its conversion to a key cycleway to the north and west of the City, the low-rise character, emerging tree lined environment, safety and historical significance should be protected.
2. The RMDS takes no account of the detrimental safety effects of increased shade and frost upon the cycleways and footpaths, and their major use by school children and an aging population in the area.
3. Overall the rules for recession planes in the RMDS are not formulated taking into account our latitude difference, shorter daylight hours, cooler temperatures, inversion layer/frosting and greater need to preserve sunlight.
4. The storm water and sewerage connections, although upgraded approximately 15 years ago, are inadequate, with flooding and sewage malfunctions during rain events above 30mm in any 8 hour period. The railway line at the eastern end of Matai Street West forms a bund that inhibits storm water flows. Intensification will only exacerbate these issues.

Alan & Robyn Ogle  
12 May 2023

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Ed **Last name:** Leeston

**Organisation:** OCHT

**On behalf of:**

**Preferred method of contact**

**Postal address:** PO Box 53

**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

OCHT Submission on pc14

12 May 2023

Attn: Mark Stevenson  
Planning Manager  
Christchurch City Council  
Po Box 73016  
Christchurch

*Submission lodged via email: engagement@ccc.govt.nz*

**ŌTAUTAHI COMMUNITY HOUSING TRUST SUBMISSION ON A NOTIFIED PROPOSAL FOR PLAN CHANGE 14 UNDER CLAUSE 6 OF SCHEDULE 1 OF THE RESOURCE MANAGEMENT ACT 1991**

Ōtautahi Community Housing Trust (“**OCHT**”), at the address for service set out below, thanks Christchurch City Council for the opportunity to submit on the notified proposal for Plan Change 14 “**PC14**”). This letter provides the substantive detail of OCHT’s submission on PC14.

**Background**

1. OCHT was established by the Christchurch City Council in 2016 to manage Council-owned social housing as well as social housing owned by the Trust. This application represents the Trust’s objectives to improve the quality and increase the supply of community housing in Christchurch.
2. OCHT is the largest non-governmental social housing provider in the South Island. It is a registered charity and a community housing provider. Christchurch City Council successfully passed on a social housing portfolio of approximately 2,300 properties and tenants to OCHT in October 2016.
3. As a Social Landlord, “OCHT’s focus is on tenant-centric service delivery, sustainable tenancies and improved property management services”.
4. OCHT deliver a minimum of 50 new social housing units per year in Christchurch and Banks Peninsula.
5. The proposed homes meet the OCHT goal of providing warm, dry and healthy homes and have been designed to the New Zealand Green Building Council’s Homestar 6 standard.

**Submission on PC14**

6. Because of OCHT’s role as a Social Landlord and property developer, they have an interest in enabling quality urban developments through increasing the availability of build-ready land across the Canterbury Region, including Christchurch City. OCHT therefore has an interest in PC14 and how it:
  - i. 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**”);

- ii. Minimises barriers that constrain the ability to deliver housing development across the housing continuum; and
  - iii. Provides for the provision of services and infrastructure and how this may impact on the existing and planned OCHT housing developments.
7. OCHT supports the general direction and intent of PC14, 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, OCHT supports:

- i. 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**”));
  - ii. 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”);
  - iii. The recognition of the need to provide sufficient development capacity to meet long term demands for housing and business land;
  - iv. The need to manage such intensification where it is located in areas exposed to a high risk of natural hazards;
  - v. The promotion of a compact urban form and residential intensification in Christchurch City;
  - vi. The provision for enabling medium to high density residential development within a walkable catchment of the City Centre and larger Commercial Centres; and
  - vii. The provision of a range of commercial and mixed-use environments which will provide for and support urban development across Christchurch City.
1. The OCHT submission seeks amendments to PC14 in the following topic areas:
- i. OCHT generally support the qualifying matters, subject to amendments and clarifications as proposed with the exception of: Low Public Transport Accessibility, Key Transport Corridors, Residential Heritage Areas, new Character Areas, which are opposed by OCHT for the reasons included in **Appendix 1**.
  - ii. OCHT considers that qualifying matters need to be expressed more clearly across PC13 and PC14 to assist with plan administration and interpretation.
  - iii. OCHT supports the application of MRZ across all relevant residential zones. It also supports the introduction of HRZ around the edge of the City Centre and where located in close proximity to larger commercial centres.
  - iv. OCHT 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. OCHT 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.

- v. OCHT 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.
  - vi. OCHT submission seeks more concise/ succinct matters of discretion that are easily understood, clearly state the outcomes intended, and provide for design innovation and choice. The scope and extent of these assessment matters provide such broad discretion that they undermine the 'Housing Supply Act's' intent of a restricted discretionary activity status. Accordingly, OCHT seeks that these assessment matters are consolidated and simplified.
  - vii. OCHT supports nationally consistent matters of discretion for MDRS standards, whilst allowing for some evidence based local context nuances. OCHT supports the use of consistent 'Urban Design Principle' matters of discretion in District Plans throughout the country.
  - viii. 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**.
2. The changes requested are made to:
- i. Ensure that OCHT can carry out its obligations as a charity and community housing provider;
  - ii. Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991;
  - iii. Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development; and
  - iv. Provide clarity for all plan users.
3. The submission points and changes sought to PC14 can be found within Table 1 of **Appendix 1** which forms the bulk of the submission.

**OCHT seeks the following decision from** Christchurch City Council:

That the specific amendments, additions or retentions which are sought as specifically outlined in **Appendix 1**, shown in red and are struck through or blue and underlined, are accepted and adopted into the insert abbreviated plan change/proposed plan name, including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

**OCHT wishes to be heard in support of their submission.**

OCHT seeks to work collaboratively with the Council and wishes to discuss its submission on PC14 to address the matters raised in its submission.

**Dated 12/05/2023**





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.....

**Ed Leeson**

General Manager Property and Development  
National Planning, Urban Design and Planning Group  
Ōtautahi Community Housing Trust

**ADDRESS FOR SERVICE:**

Ōtautahi Community Housing Trust

*PO Box 53 Christchurch 8013*

*Email: [ed.leeson@ocht.org.nz](mailto:ed.leeson@ocht.org.nz)*

**Appendix 1:**

Decisions sought on PC14

Table 1

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
<b>Zone Boundaries/ Mapping</b>					
1.		Planning maps	Support in Part	<p>OCHT support the implementation of a MRZ over all relevant residential zones. As set out in this submission, OCHT oppose the Public Transport Accessibility QM and therefore seek as a consequence of deleting this QM that the RS and RSDT zoned areas within this QM be rezoned to MRZ.</p> <p>OCHT 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 submission raises concerns with whether the costs and benefits of this QM strike an appropriate balance, and question the</p>	<p>Retain MRZ over areas where MRZ is proposed in PC14 as notified.</p> <p>Rezone to MRZ areas that are proposed as RS/ RSDT zones under the Public Transport Accessibility QM.</p> <p>Retain HRZ over areas where HRZ is proposed in PC14 as notified.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>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>OCHT support the inclusion of a High Density Residential Zone in appropriate locations close to the City Centre and larger suburban commercial centres.</p>	
<b>Chapter 6 – Qualifying Matters</b>					
2.	Tsunami Management Area	<p>5.2.2.5.1 Managing development in.</p> <p>5.2.2.5.2 Managing development within the Qualifying Matter</p>	Support in Part	<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</p>	Amend the provisions to remove / delete the mapped Hazard Management Areas from within the District Plan. Instead, these natural hazard overlays should be based on non-statutory map layers in the City Council’s Interactive Viewer that sits outside the

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>Tsunami Management Area</p> <p>5.4A.1 – 5.4A.6 Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area</p>		<p>intensification enabled under Policy 3.</p> <p>OCHT also has concerns that the proposed policy approach 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. Similarly, Policy 25 of the NZCPS directs that councils avoid increasing the risk of social, environmental, and economic harm from coastal hazards, in areas potentially affected by coastal hazards over at least the next 100 years. The conservative nature of the policy approach has implications for both the geographic extent of the hazard overlays and Qualifying Matters, and the costs and benefits of the proposed regulation and associated significant limitations on</p>	<p>District Plan. Not included in the Proposed Plan and Variation.</p> <p>Reduce the Tsunami Management Area to a 1:100 year hazard.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>redevelopment potential of large areas of existing commercial and residential building stock.</p> <p>OCHT 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. 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>This also appears to be a disconnect between arms of council actively promoting residential intensification on Council owned land in New Brighton, suggesting the absence of a coherent approach to place-making and rules that will significantly limit</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				regeneration in areas that are in need of rebuilding.	
3.	Historic Heritage, Residential Heritage Areas, and Residential Heritage Area 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>14.5.3.2.3 Building height - Residential Heritage Areas.</p> <p>14.5.3.2.7 Number of Residential Units Per Site - Residential Heritage Areas.</p>	<p>Support Historic Heritage.</p> <p>Oppose Residential Heritage Areas.</p>	<p>OCHT support the management of Historic Heritage and the use of qualifying matters for individually listed heritage items, noting that it is a matter of national significance in Section 6.</p> <p>OCHT does not oppose the Heritage Areas as a qualifying matter where there is a strong evidence basis. It does however oppose the proposed Residential Heritage Areas being a qualifying matter as we consider Council has sought to elevate (conflate) special character as historic heritage.</p> <p>Further, it is considered that the s32 assessments for the Residential Heritage Areas lack a strong evidence basis and</p>	Delete the Residential Heritage Area qualifying matter and any proposed provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>14.5.3.2.8b, 8c Setbacks - Residential Heritage Areas.</p> <p>14.5.3.2.9 Building Coverage - Residential Heritage Areas.</p> <p>14.5.3.2.10c Outdoor living space - Residential Heritage Areas.</p>		<p>fail to take into account unimplemented resource consents.</p> <p>OCHT considers that a more nuanced assessment of costs and benefits applies to areas with a high proportion of OCHT housing</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.</p> <p>The imposition (costs) of heritage controls in locations that would otherwise suit high density housing must therefore be greater than the costs applying to character and heritage areas more generally. It follows that the benefits of such regulation and</p>	



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>the identification of these areas as Qualifying Matters must therefore be greater than the benefits generally in order to justify additional regulation.</p> <p>OCHT 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 as a QM further blurs the distinction between s.6 matters. These controls are similarly not a universally accepted approach to the management and protection of heritage values, and OCHT does not support this use.</p> <p>These properties will be subject to a restricted discretionary activity consent, and in many cases are in locations that are otherwise ideally located for further</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>intensification. The reasons OCHT have for opposing this reflect the matters outlined above for Residential Heritage Areas more generally.</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 PC13, and following a first schedule process i.e. Heritage Area policies has created efficiency issues. The OCHT submission on Heritage Areas as part of PC14 therefore needs to be read together with our separate submission on PC13.</p>	
4.	Significant and Other Trees (excluding those not identified as	6.1A Qualifying matters  Table 1 - Qualifying Matters - Provisions	Support in Part	OCHT support the Significant and Other Trees qualifying matter.	Retail Significant and Other Tree Qualifying Matter.  Amend Rule 9.4.4.1.1 P12 as follows:

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	Qualifying Matters).	<p>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</p> <p>9.4.7.1 Appendix – Schedules of significant trees.</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 with Objective 3.3.2.</p>	<p>Rule 9.4.4.1.1 P12 - Activities shall be undertaken by, or under the supervision of, a works arborist. <del>employed or contracted by the Council or a network utility operator.</del></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
5.	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 – 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</p>	Oppose in Part	<p>OCHT support, in principle, the management of character as a qualifying matter. However, OCHT 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 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>OCHT is opposed to the use of character areas which reduce density below the level</p>	<p>Delete all new or extended character areas as qualifying matters.</p> <p>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.</p> <p>Delete all new built form standards for character areas.</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>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>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>provided by the underlying zone (MDRS) or that seek to control the demolition or alteration of buildings, unless these buildings individually qualify as historic heritage.</p> <p>OCHT considers that if the District Plan is going to apply restrictions on the demolition of buildings and the development of new buildings on these sites, then these buildings should be individually identified as meeting a historic heritage significance threshold through appropriate assessments and protected through the Historic Heritage chapter of the Proposed District Plan.</p> <p>OCHT further considers that a more nuanced assessment of costs and benefits applies to areas with a high proportion of OCHT housing, i.e. the benefits of providing a greater number of houses for the most</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>vulnerable members of society are greater than retaining the character associated with existing housing per se, particularly when much of the character is linked to the association with historic social housing, and therefore the character or heritage benefits of such locations must be even greater to outweigh the social costs.</p> <p>A more nuanced assessment of costs and benefits is likewise required for character and heritage areas in locations that are otherwise ideally located for further intensification.</p> <p>The imposition (costs) of heritage and character controls in locations that would otherwise suit high density housing must therefore be greater than the costs applying to character and heritage areas more</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>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>	
6.	Low Public Transport Accessibility.	<p>14.1 Introduction, 14.2 Objectives and Policies, 14.3 How to interpret and apply the rules, 14.4 Rules - Residential Suburban Zone and Residential Suburban Density Transition Zone, 14.7 Rules - Residential Hills Zone, 14.8 Rules - Residential Banks Peninsula Zone, 14.15 Rules - Matters of control and discretion, 14.16 Rules - Appendices – all as they apply to areas that are zoned</p>	Oppose	<p>OCHT opposes the 'Low Public Transport Accessibility' being a qualifying matter as the s32 assessment lacks a strong evidence basis, especially given the geographic extent (costs) of the qualifying matter.</p> <p>This qualifying matter is opposed because whilst access to public transport is beneficial, it is not so critical as to make the application of MDRS invalid.</p> <p>The provision of improved access to public transport is a matter that is capable of resolution through increased</p>	<p>Delete the Low Public Transport Accessibility Qualifying Matter and all associated provisions.</p> <p>Rezone all areas subject to this QM to MRZ (unless there is another QM in play that would prevent rezoning)</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		Residential Suburban or Residential Hills, or in Lyttelton zoned Residential Banks Peninsula.		<p>funding and/or innovation in how public transport is provided into the future. The qualifying matter means that if improved services are provided to an area, a full First Schedule process will need to be followed to amend the zoning.</p> <p>MDRS enables increased population, which will in turn support improved public transport services. Conversely the lack of potential increase in population (through restricted zoning) could be used as a justification for not improving services. In short, there is a clear 'chicken and egg' situation with service provision.</p> <p>OCHT 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</p>	



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				exacerbate existing social inequalities.	
7.	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>OCHT oppose the ‘City Spine’ being a qualifying matter as the s32 assessment lacks a strong evidence based for the scale of setback as a qualifying matter.</p> <p>The roads covered by this matter are not State Highways and therefore are not considered ‘nationally significant infrastructure’.</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</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
		<p>15.6.2.11 Setback from corridor.</p> <p>15.8.2.13 Setback from corridor.</p> <p>15.10.2.10 Setback from corridor.</p> <p>15.12.2.13 Setback from corridor.</p> <p>15.14.5.3 Matters of Discretion.</p>		<p>to deliver good urban design outcomes and facilitates a continuous street edge (often with veranda cover for pedestrians). The proposed spine corridor QM is directly counter to the delivery of good quality 'main street' retail environments.</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 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</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				without major land acquisition and demolition.	
<b>Chapter 5 – Natural Hazards</b>					
8.	5.5	Policy 5.2.2.5.2 - Managing development within Qualifying Matter Tsunami Management Area	Support in Part	<p>OCHT 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>OCHT 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)</p>	<p>Amend Policy 5.2.2.5.2 as follows:</p> <p>Within the Tsunami Management Area Qualifying Matter, <del>avoid discourage</del> development, subdivision and land use that would provide for intensification of any site, <del>unless the risk to life and property is acceptable.</del></p> <p>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.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				so there is a disconnect between the use of the term 'avoid' and what the provisions would allow for as a permitted activity.	
9.	5.4A	Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area	Oppose in Part	Spatial identification of coastal hazard management areas should 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	<p>The references in all rules in this section to “the areas shown on the planning maps as...”, should be amended to reference <b><u>interactive maps on the Council's GIS website and the return period of the mapped hazard should be reduced to a 1 in 100 year event.</u></b></p> <p>Rule 54A.5 NC3 should be amended as follows:</p> <p><b>a. Development, <del>subdivision</del> 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.</b></p> <p>Any consequential amendments to zones, overlays, precincts, and qualifying matters to reflect the relief sought in the submission.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>without a reliance on the Schedule 1 Resource Management Act 1991 process. OCHT notes that this is an approach taken by other Councils around the country.</p> <p>Rule 54A.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.</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</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				constructed as a permitted activity. If this level of intensification is provided for, then having a non-complying activity status and an avoid policy seems non-sensical.	
<p><b>Chapter 6 – General Rules and Procedures</b></p> <p><b>6.10A – Tree Canopy Cover and Financial Contributions</b></p>					
10.	6.10A	<p>6.10A</p> <p>Rules 8.3, 8.5.1 and 8.7.12 - Subdivision;</p> <p>Rules 14.4.2 – 14.11.2 – Residential Built Form Standards.</p> <p>14.6.1.3 RD13.</p> <p>14.6.2.7 - Landscaping and tree cover.</p>	Oppose	<p>OCHT welcomes the Council’s recognition of trees as a key element in successful urban environments. This aligns with our internal landscape design guides which inform all our projects and the need to integrate landscaping with housing.</p> <p>OCHT 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</p>	Delete Section 6.10A and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>replacement, undergrounding of overhead wires, and street tree planting.</p> <p>OCHT has substantial concerns with the 20% tree canopy cover target and considers it fundamentally unachievable in medium and high density environments on private land. OCHT 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>OCHT considers that the proposed financial contribution calculator is complicated and flawed, a simpler formula would be to require 1 tree to be planted per 100m<sup>2</sup> of site area, as an easier compliance threshold</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>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 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</p>	



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				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.	
<b>Chapter 8 – Subdivision, Development and Earthworks</b>					
11.		<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>	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.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>Clause 8.3.7 – consent notices</p> <p>Clause 8.7.12 – Assessment matters</p>			
12.		<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 than 20m<sup>3</sup> 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 20m<sup>3</sup> limit is frequently triggered for low density suburban development let alone medium density outcomes. As an example a standard driveway for a single dwelling</p>	<p>Amend Table 9(d) so the maximum volume is <b><u>250m<sup>3</sup></u></b>/ site <b><u>net fill above existing ground level</u></b></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>is 4m wide by say 30m long = 120m<sup>2</sup>. 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 24m<sup>3</sup> (120m<sup>2</sup> x 0.2m depth), with fill being the same, resulting in 48m<sup>3</sup>.</p> <p>The rule threshold is considered to be unrealistically low, such that it generates numerous consents that are 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</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>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>	
<b>Residential Zone Introduction and Policy Framework – 14.1-14.2</b>					
13.		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</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><b><u>(iv) medium density residential development is established across the majority of the City unless precluded by a qualifying matter.</u></b></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>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>	
14.		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 – <b>High Good</b> quality, medium density residential development</p> <p>Encourage innovative approaches to comprehensively designed, <b>high good</b> 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 character) <u>reflects the planned urban built character of an area</u>, through:</p> <ol style="list-style-type: none"> <li>i. consultative planning approaches to identifying particular areas for residential intensification and to defining <b>high good</b> quality, built and urban design outcomes for those areas;</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<ul style="list-style-type: none"> <li>ii. encouraging and incentivising amalgamation and redevelopment across large-scale residential intensification areas;</li> <li>iii. providing design guidelines to assist developers to achieve <b>high good</b> quality, medium density development;</li> <li>iv. considering input from urban design experts into resource consent applications;</li> <li>v. promoting incorporation of low impact urban design elements, energy and water efficiency, and lifestage inclusive and adaptive design; and</li> <li>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.</li> </ul>
15.		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>14.2.5.3 Policy – <b>Good qQ</b>Quality large scale developments</p> <ul style="list-style-type: none"> <li>a. Residential developments of four or more residential units contribute to a <b>high good</b> quality residential environment through site layout, building and landscape design to achieve: <ul style="list-style-type: none"> <li>i. engagement with the street and other spaces;</li> </ul> </li> </ul>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<ul style="list-style-type: none"> <li>ii. minimisation of the visual bulk of buildings and provision of visual interest;</li> <li>i. a <b>high good</b> level of internal and external residential amenity;</li> <li>ii. <b>high good</b> quality shared spaces, including communal living spaces and accessways that provide safe, direct access for pedestrians;</li> <li>iii. a safe and secure environment; and</li> <li>iv. public through connections for large sites with multiple public frontages.</li> </ul>
<b>14.3 How to interpret and apply the rules</b>					
16.		14.3 How to interpret and apply the rules – Clause f. xvi.	Oppose	The proposed deletion is consequential to the deletion of the Residential Heritage Area qualifying matter.	<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> <ul style="list-style-type: none"> <li>i. Historic Heritage including heritage items, heritage settings, <b>Residential Heritage Area, Residential Heritage Area Interface</b></li> </ul>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
<b>14.4 Residential Suburban and RSDT Zone rules</b>					
17.	Residential	14.4.2.2 – Tree and garden planting	Oppose	<p>The proposed amendments to this rule duplicate and confuse the regulatory framework with the tree FC rule – essentially it introduces two rules to control the same matter.</p> <p>OCHT 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 should simply have an advice note directing Plan users to the FC rule and the additional tree canopy outcomes sought in that separate rule.</p>	Delete the proposed amendments and retain the Operative Plan rule.
<b>14.5 Medium Density Zone Rules</b>					



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
18.	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 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>Amend notification statements in both activity and built form rules to align with this logic.</p> <p><b>Non-notified:</b></p> <p>14.5.1.3 (RD1) – four or more units</p> <p>14.5.2.2 – landscaping</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>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>14.5.2.16 – mechanical ventilation</p> <p>14.5.2.18 – Spine road setbacks</p> <p><b>Open to limited but not public notification:</b></p>
19.	Residential	Assessment matters	Oppose	<p>The proposed assessment matters for both the '4 or more units' urban design rule and the built form rules are excessive and overlapping. They should be simplified and consolidated.</p>	<p>For the 'non-notified' rules set out above, the matters for assessment should be limited to the adequate provision of amenity for occupants and the delivery of a functional and attractive streetscape.</p> <p>For the rules that potentially affect neighbouring sites set out above, additional matters relating to consideration of the amenity of neighbouring sites are appropriate.</p> <p>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.</p> <p>For the 4+ unit urban design rule, matters of discretion should be as follows:</p> <p>a) Whether the design of the development is in keeping with, or complements, the scale and</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>character of development anticipated for the surrounding area and relevant significant natural, heritage and cultural features.</p> <p>b) 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;</p> <p>c) Privacy and overlooking within the development and on adjoining sites, including the orientation of habitable room windows and balconies;</p> <p>d) 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;</p> <p>Where on-site car parking is provided, the design and location of car parking (including garaging) as viewed from streets or public open spaces</p>
20.	Residential	14.5.2.2 – Landscaping and tree canopy	Oppose	In accordance with our submission seeking deletion of the tree canopy financial contribution rule, the	Delete rule and replace with the following: <b><u>14.5.2.2 landscaped area.</u></b>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>landscaping and tree canopy rule should 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><b><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></b></p> <p><b><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></b></p> <p><b><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></b></p>
21.	Residential	14.5.2.4 – Building Coverage	Support in Part	<p>The rule implements MDRS as per Schedule 3A.</p> <p>Support additional exemptions for eaves and guttering, although this should 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</p>	<p>Amend rule as follows:</p> <ol style="list-style-type: none"> <li>a. The maximum building coverage must not exceed 50% of the net site area.</li> <li>b. ...</li> <li>c. <b><u>Eaves and roof overhangs up to <del>300mm</del> 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></b></li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				are controlled through separate rules on internal setbacks and height-to-boundary.	
22.	Residential	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 articulation in the street-facing facade.</p> <p>Clause (iv) – support reduction in setbacks for accessory buildings, subject to the limitations to height and</p>	<p>Retain clause (a)(i) and (ii) as notified.</p> <p>Amend clause(a)(iii) as follows:</p> <p>Only road boundary: Eaves, <del>and</del> roof overhangs, <del>and</del> <u>porches</u> to a maximum of <del>300mm</del> <u>600mm</u> in width measured from the wall of a building and guttering up to 200mm in width.</p> <p>Amend clause (a)(iv) as follows:</p> <p>All other accessory buildings or garages, <u>including garages</u> that internally access a residential unit.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				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	
<b>High Density Residential Zone</b>					
23.	Residential	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 should be non-notified as it is only the 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</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> <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>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>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>14.6.2.8 – 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> <p>14.6.2.3 – internal boundary setbacks</p> <p>14.6.2.13 – Water for Firefighting (FENZ only)</p> <p>Open to full s95 assessment:</p> <p>14.6.2.1 – height</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
24.	Residential	Assessment matters	Oppose	<p>The proposed assessment matters for both the '4 or more units' urban design rule and the built form rules are excessive and overlapping. They should be simplified and consolidated.</p>	<p>For the 'non-notified' rules set out above, the matters for assessment should be limited to the adequate provision of amenity for occupants and the delivery of a functional and attractive streetscape.</p> <p>For the rules that potentially affect neighbouring sites set out above, additional matters relating to consideration of the amenity of neighbouring sites are appropriate.</p> <p>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.</p> <p>For the 4+ unit urban design rule, matters of discretion should be as follows:</p> <p><b><u>e) 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></b></p> <p><b><u>f) The relationship of the development with adjoining streets or public open spaces including</u></b></p>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p><u>the provision of landscaping, and the orientation of glazing and pedestrian entrances;</u></p> <p><u>g) Privacy and overlooking within the development and on adjoining sites, including the orientation of habitable room windows and balconies;</u></p> <p><u>h) 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>i) 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>
25.	Residential	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 should be deleted and replaced with the MDRS standard.</p> <p>An additional clause is proposed for non-residential</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>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				activities that aligns with the MDRS outcomes.	<p><b><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></b></p> <p><b><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></b></p>
26.	Residential	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 should 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>Amend as follows:</p> <p>a. <u>The maximum building coverage must not exceed 60% of the net site area;</u></p> <p>i. <u>Any eaves and roof overhangs up to <b>300mm</b> <b>600mm</b> 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></p> <p>Delete Clause (a)(ii)</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<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 and HRZ.</p>	
27.	Residential	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>For smaller scale developments i.e.. 2-3 storey, having parking recessed behind the front façade provides an acceptable</p>	<p>Delete the rule and replace as follows:</p> <p><b><u>14.6.2.14 garaging and carports</u></b></p> <p><b><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></b></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>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>	
28.	Residential	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 facilitate public works then it should use the designation powers available to it.</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>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>	

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Rebecca **Last name:** Eng

**Organisation:** Transpower New Zealand

Limited

**On behalf of:**

**Preferred method of contact** Email

**Postal address:** PO Box 17 215 Greenlane

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:** 1546

**Email:** environment.policy@transpower.co.nz

**Daytime Phone:** 09 590 7072

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

Transpower New Zealand Limited Submission on Christchurch District Plan Plan Change 14 (Final)

# Submission by Transpower New Zealand Limited

## Christchurch District Plan – Proposed Plan Change 14: The Housing and Business Choice Plan Change

12 May 2023

*Keeping the energy flowing*



TRANSPOWER



## Form 5

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

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

To Christchurch City Council (“the Council”)

**Name of submitter:** Transpower New Zealand Limited (“Transpower”)

**This is a submission on changes proposed to the following operative plan (“Proposed Plan Change”):**

Proposed Plan Change 14: The Housing and Business Choice Plan Change to the Christchurch District Plan (“District Plan”).

**Transpower could not gain an advantage in trade competition through this submission.**

**The specific provisions of the Proposed Plan Change that my submission relates to are:**

The Proposed Plan Change in its entirety, and particularly the extent to which the Proposed Plan Change:

- gives effect to the National Policy Statement on Electricity Transmission 2008 (“NPSET”);
- gives effect to the Canterbury Regional Policy Statement (republished July 2021) (“CRPS”); and
- recognises the National Grid as a qualifying matter in the implementation of the Resource Management (Enabling Housing Supply and other Matters) Amendment Act 2021 (“RMA-EHS”).

**Transpower’s submission is:**

Background and context

Transpower is the state-owned enterprise that plans, builds, maintains, owns and operates New Zealand’s high voltage electricity transmission network, known as the National Grid, that carries electricity across the country. Transpower provides the required infrastructure to transport electricity from the point of generation to local electricity distribution companies, which supply electricity to everyday users.

Transpower needs to efficiently operate, maintain, upgrade and develop the National Grid to meet increasing demand; to connect new generation; and to ensure security of supply, thereby contributing to New Zealand’s economic and social aspirations. For this reason, Transpower has a significant interest in the development of an effective, workable, and efficient Christchurch District Plan where it may affect the National Grid. In respect of the Proposed Plan Change, providing for greater residential densities in the vicinity of the National Grid has the potential to significantly impact Transpower’s ability to operate, maintain, upgrade and develop the National Grid.

**Appendix A** includes further background information, including an overview of Transpower.

Statutory framework

The NPSET confirms the national significance of the National Grid and establishes national policy direction to ensure that decision-makers under the Resource Management Act 1991 (“RMA”) recognise and provide for the benefits of electricity transmission, while managing effects of the National Grid and managing the effects of activities and development in the vicinity of the National Grid.

The single Objective of the NPSET is:

*“To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:*



- *managing the adverse environmental effects of the network; and*
- *managing the adverse effects of other activities on the network.”*

Policies 10 and 11 of the NPSET provide the primary direction on the management of adverse effects of subdivision, land use and development activities on the transmission network.

Similarly, the CRPS includes Policy 16.3.4, which is specific to the National Grid, and addresses subdivision, land use and development activities that may limit the ability of the electricity transmission network to be operated, maintained, upgraded and developed.

Together, these policies are critical matters for a district plan to address and are specifically relevant to Transpower’s submission on the Proposed Plan Change.

The relevant statutory provisions are included in further detail in **Appendix A**.

#### National Grid assets in Christchurch

**Appendix A** includes a description of the National Grid assets in Christchurch. A map of existing National Grid assets in Christchurch City is included as **Appendix B**. Appendix 3 to Part 2 of the Section 32 Report that accompanies the Proposed Plan Change identifies over 1000 sites and approximately 54 hectares of land that is subject to the Proposed Plan Change and also within either the National Grid Yard or the corridor for electricity distribution lines.<sup>1</sup>

By way of example, an excerpt of the Proposed Plan Change qualifying matter planning map illustrating the location of the National Grid qualifying matter in Islington is included below as Figure 1.

*Figure 1: Excerpt of Planning Map 36 Qualifying Matter - Existing and Proposed (Notified 23/09/2022) National Grid transmission lines qualifying matter (red hatched area) in the vicinity of the Islington Substation*



#### The National Grid as a ‘qualifying matter’

Transpower acknowledges that the Proposed Plan Change, being an Intensification Planning Instrument (“IPI”), is to:

- incorporate the MDRS of the Resource Management (Enabling Housing Supply and other Matters) Amendment Act 2021 (“RMA-EHS”),

<sup>1</sup> It is assumed that this area does not include the National Grid Subdivision Corridor.

- give effect to Policies 3 and 4 of the National Policy Statement on Urban Development 2020 (“NPS-UD”); and
- include objectives and policies in accordance with clause 6 to Schedule 3A of the RMA (section 77G5).

Sections 77I and 77O of the RMA-EHS provides a specified territorial authority may make the MDRS and the relevant building height or density requirements under Policy 3 of the NPS-UD less enabling of development in relation to a ‘qualifying matter’. A ‘qualifying matter’ is defined by section 77I and 77O of the RMA-EHS.

The National Grid corridor provisions (being those that relate to the National Grid Yard and National Grid Subdivision Corridor described in Appendix A) clearly meet the definition of a ‘qualifying matter’ because:

- the provisions are required to give effect to the NPSET being a national policy statement (other than the NPS-UD);
- the provisions are required for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure; and
- provisions that restrict subdivision and development in the vicinity of the National Grid are included in the Operative District Plan.

An assessment, as required by section 77K(1) of the RMA, to supplement the assessment included in the Section 32 Report (Appendix 3 to Part 2) and to support the incorporation of the National Grid corridor provisions as an existing qualifying matter in the IPI is included in **Appendix A**.

#### Proposed Plan Change 14

The Proposed Plan Change, amongst other matters:

- includes the National Grid Yard provisions that apply in certain residential and commercial zones as an existing qualifying matter; and
- adds a new layer in the planning maps ‘Qualifying Matter - Electricity Transmission Corridors and Infrastructure – existing and proposed’ to identify where the qualifying matter applies.

#### Transpower’s submission

Transpower’s submission on the Proposed Plan Change generally supports the proposed provisions and particularly supports the identification of the National Grid as a qualifying matter and the inclusion of the National Grid Yard provisions in the IPI. That said, Transpower seeks the provisions are amended to ensure that the rule framework for subdivision within the National Grid Subdivision Corridor in the District Plan is explicitly included as part of the existing National Grid qualifying matter. In addition, Transpower’s submission seeks limited amendments to provisions that address qualifying matters in the District Plan, along with amendments in relation to the Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area and Tree Canopy provisions. It is Transpower’s conclusion that these amendments are necessary to:

- establish a clear and appropriate expectation of future subdivision and development in the vicinity of the National Grid;
- provide greater clarity for plan users;
- give effect to Policies 1, 2, 10 and 11 of the NPSET;
- give effect to the Policy 4 of the NPSUD;
- give effect to Policy 16.3.4(2) of the CRPS;
- meet the requirements of section 32 and 75 of the RMA; and therefore
- achieve the purpose of the RMA.

Transpower’s specific submission points are included in **Appendix C**.

**Transpower seeks the following decision from the local authority:**

Retain or amend the provisions of the Proposed Plan Change to give effect to the NPSET and CRPS as set out in **Appendix C** including such further alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

**Transpower wishes to be heard in support of its submission.**

Due to the specific interests of Transpower, and particularly the national significance of the National Grid, Transpower will not consider presenting a joint case.

**Signature of person authorised to sign  
on behalf of Transpower New Zealand Limited**

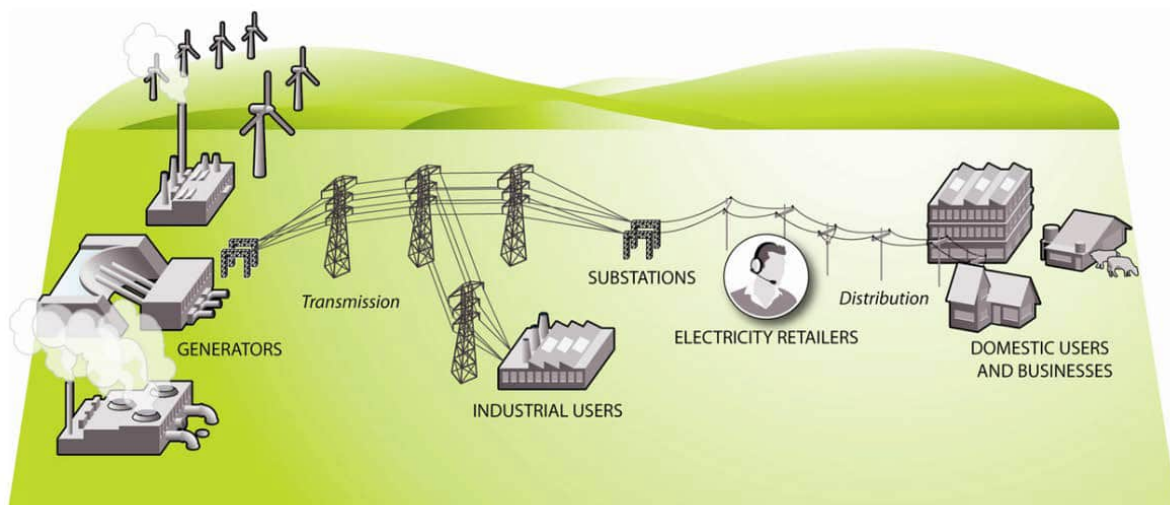
**Date:** 12 May 2022  
**Electronic address for service:** environment.policy@transpower.co.nz  
**Telephone:** +64 9 590 7072  
**Postal address:** PO Box 17 215 Greenlane, Auckland 1546  
**Contact person:** Rebecca Eng

## Appendix A: Supporting Information

### About Transpower

Transpower is the state-owned enterprise that plans, builds, maintains, owns and operates New Zealand's high voltage electricity transmission network, known as the National Grid. The National Grid connects power stations, owned by electricity generating companies, directly to major industrial users and distribution companies feeding electricity to the local networks that, in turn, distribute electricity to homes and businesses. The role of Transpower is illustrated in Figure 2.

Figure 2: Role of Transpower in New Zealand's Electricity Industry (source: MBIE)



The National Grid stretches over the length and breadth of New Zealand from Kaikohe in the North Island to Tiwai Point in the South Island and comprises some 11,000 kilometres of transmission lines and cables and more than 170 substations, supported by a telecommunications network of some 300 telecommunication sites that help link together the components that make up the National Grid.

Transpower's role and function is determined by the State-Owned Enterprises Act 1986, the company's Statement of Corporate Intent, and the regulatory framework within which it operates. Transpower does not generate electricity, nor does it have any retail functions.

It is important to note that Transpower's role is distinct from electricity generation, distribution or retail. Transpower provides the required infrastructure to transport electricity from the point of generation to local lines distribution companies, which supply electricity to everyday users. These users may be a considerable distance from the point of generation.

Transpower's Statement of Corporate Intent for 1 July 2022, states that:

*"Transpower is central to the New Zealand electricity industry, connecting New Zealanders to their power system through safe, smart solutions for today and tomorrow. Our principal commercial activities are:*

*- as grid owner, to reliably and efficiently transport electricity from generators to distributors and large users; and*

*- as system operator, to operate a competitive electricity market and deliver a secure power system."*

In line with this role, Transpower needs to efficiently operate, maintain and develop the network to meet increasing demand and to maintain security of supply, thereby contributing to New Zealand's economic and social aspirations. It must be emphasised that the National Grid is an ever-developing system, responding to changing supply and demand patterns, growth, reliability and security needs.

As the economy electrifies in pursuit of the most cost efficient and renewable sources, the base case in Transpower's *'Whakamana i Te Mauri Hiko'* predicts that electricity demand is likely to increase around 55% by 2050. *'Whakamana i Te Mauri Hiko'* suggests that meeting this projected demand will require significant and frequent investment in New Zealand's electricity generation portfolio over the coming 30 years, including new sources of resilient and reliable grid connected renewable generation. In addition, new connections and capacity increases will be required across the transmission system to support demand growth driven by the electrification of transport and process heat. Simply put, New Zealand's electricity transmission system is the infrastructure on which our zero-carbon future will be built. This work supports Transpower's view that there will be an enduring role for the National Grid in the future, and the need to build new National Grid lines and substations to connect new, renewable generation sources to the electricity network.

Transpower therefore has a significant interest in contributing to the process of developing an effective, workable and efficient Christchurch District Plan where it may affect the National Grid. In respect of the Proposed Plan Change, providing for greater residential densities in the vicinity of the National Grid has the potential to significantly impact on Transpower's ability to operation, maintain, upgrade and develop the National Grid.

### **National Grid assets in Christchurch**

Transpower owns and operates the following assets in Christchurch:

The following National Grid assets are within, or traverse, the Council's jurisdiction:

- Bromley – Islington A (BRY-ISL A) 220kV double circuit transmission line on steel towers;
- Roxburgh – Islington A (ROX-ISL A) 220kV single circuit transmission line on steel towers;
- Benmore – Islington A (BEN-ISL A) 220kV single circuit transmission line steel towers;
- Islington – Kikawa A (ISL-KIK A) 220kV single circuit transmission line on steel towers;
- Islington – Kikawa B (ISL-KIK B) 220kV double circuit transmission line on steel towers;
- Hororata – Islington E (HOR-ISL E) 110kV double circuit transmission line on single poles;
- Islington Deviation A (ISL Deviation A) 66kV double circuit transmission line on steel towers; and
- Islington – Southbrook A (ISL-SBK A) 66kV double circuit transmission line on steel towers.

There are also three substations within Christchurch City, being Islington, Addington, and Bromley. Transpower also has a South Island System Control Site and a Southern Data Centre Site within Christchurch City. The location of these assets is shown on the map included as Appendix B.

### **Statutory Framework**

#### *National Policy Statement on Electricity Transmission 2008*

The NPSET was gazetted on 13 March 2008. The NPSET confirms the national significance of the National Grid and provides policy direction to ensure that decision makers under the RMA:

- recognise and provide for the benefits of the National Grid;
- manage the adverse effects on the environment of the National Grid;
- manage the adverse effects of third parties on the National Grid; and
- facilitate long term strategic planning for transmission assets.

The NPSET only applies to the National Grid, being the assets used or operated by Transpower, and not to electricity generation or distribution networks.

The NPSET sets a clear directive on how to provide for National Grid resources (including future activities) when drafting planning documents and therefore councils have to work through how to make appropriate provision for the National Grid in their plans, in order to give effect to the NPSET.

The single Objective of the NPSET is:

*“To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:*

- *managing the adverse environmental effects of the network; and*
- *managing the adverse effects of other activities on the network.”*

The NPSET’s 14 policies provide for the recognition of the benefits of the National Grid, as well as the environmental effects of transmission and the management of adverse effects on the National Grid. The policies have to be applied by both Transpower and decision-makers under the RMA, as relevant. The development of the National Grid is explicitly recognised in the NPSET.

Policies 10 and 11 of the NPSET provide the primary direction on the management of adverse effects of subdivision, land use and development activities on the transmission network. These policies are critical matters for a District Plan to address, and are specifically relevant to the Proposed Plan Change.

Policy 10 is as follows:

*“In achieving the purpose of the Act, decision-makers must to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised.”*

Policy 11 relates to the development of buffer corridors, and is as follows:

*“Local authorities must consult with the operator of the national grid, to identify an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for in plans and/or given resource consent. To assist local authorities to identify these corridors, they may request the operator of the national grid to provide local authorities with its medium to long-term plans for the alteration or upgrading of each affected section of the national grid (so as to facilitate the long-term strategic planning of the grid).”*

Policy 12 requires the identification of the transmission network on territorial authority planning maps.

Section 75(3)(a) of the RMA requires that district plans must ‘give effect’ to a National Policy Statement. Case law has established that the words “give effect to” means to implement, which is a strong directive, creating a firm obligation on the part of those subject to it.

*Canterbury Regional Policy Statement 2013*

Section 75(3) of the RMA also requires the Proposed Plan to give effect to a regional policy statement. The operative CRPS (republished in July 2021) includes the following Policy 16.3.4 that is specific to the National Grid and must be given effect to:

***“16.3.4 Reliable and resilient electricity transmission network within Canterbury***

*To encourage a reliable and resilient national electricity transmission network within Canterbury by:*

1. *having particular regard to the local, regional and national benefits when considering operation, maintenance, upgrade or development of the electricity transmission network;*
2. *avoiding subdivision, use and development including urban or semi urban development patterns, which would otherwise limit the ability of the electricity transmission network to be operated, maintained, upgraded and developed;*
3. *enabling the operational, maintenance, upgrade, and development of the electricity transmission network provided that, as a result of route, site and method selection, where;*
  - a. *the adverse effects on significant natural and physical resources or cultural values are avoided, or where this is not practicable, remedied or mitigated; and*
  - b. *other adverse effects on the environment are appropriately controlled.”*

Clause 2 of Policy 16.3.4 is particularly relevant to the Proposed Plan Change and provides clear direction that subdivision, use and development, including urban development, that may limit the ability of the National to be operated, maintained, upgraded and developed must be avoided.

#### *Operative District Plan National Grid Provisions*

The District Plan contains provisions that relate to land use activities and subdivision within the defined areas in the vicinity of the National Grid. Within these areas subdivision, structures, activities and earthworks are subject to rules that are to protect the National Grid and give effect to the NPSET.

More specifically, within relevant residential and commercial zones in the District Plan:

- sensitive activities<sup>2</sup> and buildings (excluding accessory buildings associated with an existing activity) are a non-complying activity;
  - within 12 metres of the centre line of a 110kV or 220kV National Grid transmission line or within 12 metres of the foundation of an associated support structure; or
  - within 10 metres of the centre line of a 66kV National Grid transmission line or within 10 metres of the foundation of an associated support structure; or
- fences within 5 metres of a National Grid transmission line support structure foundation are a non-complying activity.<sup>3</sup>
- subdivision of any site (other than an allotment to provide for a network utility) located within the following corridors is a restricted discretionary activity where certain standards are achieved and is otherwise a non-complying activity:
  - 37 metres of the centre line of a 220kV National grid transmission line as shown on planning maps; or
  - 32 metres of the centre line of a 66kV or 110kV National grid transmission line as shown on planning maps.<sup>4</sup>

#### **The National Grid as a ‘qualifying matter’**

Sections 77I and 77O of the RMA-EHS provides a specified territorial authority may make the MDRS and the relevant building height or density requirements under Policy 3 less enabling of development in relation to a qualifying matter (as defined by section 77I and 77O of the RMA-EHS).

The National Grid provisions in the District Plan clearly meets the definition of a qualifying matter as:

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<sup>2</sup> As defined in the District Plan.

<sup>3</sup> For the purpose of this submission, the land use rules described above are referred to as the “National Grid Yard”.

<sup>4</sup> For the purpose of this submission, the subdivision rules described above are referred to as the “National Grid Subdivision Corridor”.

- it is a matter required to give effect to the NPSET;
- it is a matter required for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure; and
- provisions that restrict development in relation to the National Grid are included in the Operative District Plan.

#### *Giving effect to the NPSET*

The NPSET confirms the national significance of the National Grid and addresses its effects. Importantly, it also addresses effects on the National Grid, including the activities of others (for example, residential development) and requires that these do not compromise the operation, maintenance, upgrading and development of the National Grid.

The NPSET mandates a corridor for this protection. Specifically, Policy 11 of the NPSET requires that local authorities consult Transpower to identify an appropriate buffer corridor within which sensitive activities (such as residential development) will generally not be provided for in plans and/or given resource consent. This outcome is appropriate and was tested through a comprehensive section 32 analysis undertaken by the Ministry for the Environment (when the NPSET was developed) and various planning processes including Board of Inquiry hearings.

#### *Ensuring the safe or efficient operation of nationally significant infrastructure*

Development under and near high voltage transmission lines presents risks to the safe and efficient operation of the National Grid and needs to be managed carefully. It is critical that any development near the National Grid occurs in an appropriate and safe way. Transpower seeks to ensure that risks such as electrical shocks are minimised to the greatest extent possible, access for vital maintenance and upgrade work is not constrained, and reverse sensitivity and direct effects are managed, so that its nationally significant infrastructure can continue to operate in the long-term, keeping the lights on across New Zealand.

Transpower is not opposed to residential development and understands the intent of the recent reforms to address issues with New Zealand's housing supply and affordability. Transpower is working with developers and individuals across New Zealand on a daily basis in an effort to accommodate and support new development in a manner which takes the National Grid assets fully into account. If new land uses are properly designed and managed, effects on the safe and efficient operation of the National Grid can be reasonably managed.

Transpower prefers, wherever possible, to manage such risks and effects proactively. Proactive management through appropriate planning rules such as buffer corridors or setbacks is the most effective way of ensuring development occurs in a manner that is compatible with the National Grid and is consistent with the policy direction in the NPSET and the resulting buffer corridor approach within district plans throughout New Zealand.

While assisting Councils to give effect to the NPSET, the National Grid corridors protect the safe and efficient operation of the National Grid by:

- ensuring that sensitive activities such as residential development will generally not be provided for in close proximity to the lines;
- partially minimising the risk of inadvertent contact with the lines including the risk of flashovers (where an electrical discharge 'jumps' the air gap between an object and the line);
- helping to reduce nuisance impacts on landowners and subsequent complaints about the lines;
- partially protecting the lines from activities and development that could have direct or indirect effects on them;

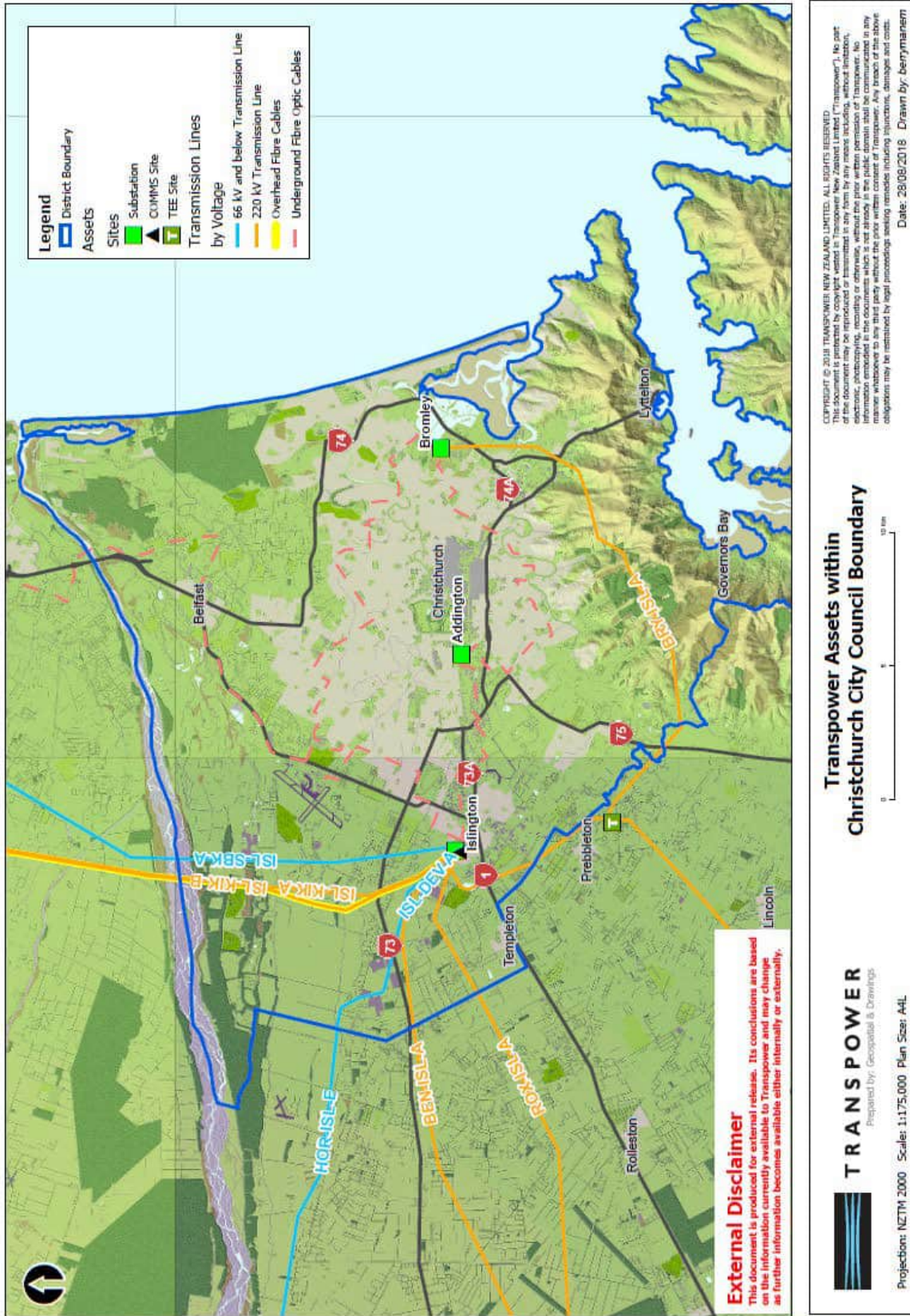


- partially protecting access to the National Grid by ensuring development activities cannot occur close to the National Grid and prevent Transpower's access to it; and
- partially enabling efficient and safe operation, maintenance, upgrade and development of the lines.

#### Summary

Based on the above, and consistent with the Council's Section 32 Report, it is submitted there is no ambiguity as to whether National Grid Yard and National Grid Subdivision Corridor are qualifying matters. It is noted that the Report of the Environment Committee on the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill dated December 2021, which noted at page 15 [emphasis added]: *"the qualifying matters set out in new section 77[1] include a matter of national importance and a matter required to ensure that nationally significant infrastructure operates safely or efficiently and avoid reverse sensitivity concerns. **This could include ensuring residential housing is safely set back from high voltage transmission lines, and other infrastructure such as airport noise areas, in order to avoid reverse sensitivity concerns**".*

Appendix B: Map of Transpower Assets in Christchurch



## Appendix C: Specific Submission on Proposed Plan Change 14: The Housing and Business Choice Plan Change to the Christchurch District Plan

The following table sets out the decisions sought by Transpower, including specific amendments to the provisions of the Proposed Plan Change (shown in red underlined and ~~red strikethrough~~), and the reasons for Transpower’s support for, or opposition to, the notified provisions of the Proposed Plan Change.

Provision	Support/ Oppose	Submission/Reasons	Decision Sought
<b>Chapter 2 – Abbreviations and Definitions</b>			
<b>Definitions</b>			
New definition of ‘Qualifying matter’	<b>Oppose</b>	The concept of qualifying matters is introduced by the Resource Management (Enabling Housing Supply and other Matters) Amendment Act 2021. Qualifying matters are defined by section 77I and 77O of the RMA. Transpower seeks that the District Plan includes a definition of ‘qualifying matter’ to support the framework of the Proposed Plan Change and to assist plan users to understand and navigate the IPI. Furthermore, it will assist plan users to understand the application of qualifying matters given their relevance will extend beyond the IPI and remain in the District Plan.	<b>Insert</b> a new definition of qualifying matter to complement clause (b) in 6.1A.1 as follows:  <u>“Qualifying matter means a matter referred to in section 77I or 77O of the RMA including as implemented by the provisions listed in 6.1A.1 Table 1.”</u>
<b>Chapter 3 Strategic Directions</b>			
3.3.7 Objective – Well-functioning urban environment	<b>Support in part</b>	Transpower generally supports the Objective 3.3.7, and in particular the recognition of wellbeing and health and safety. It is noted that the initial clause of the Objective is mandatory, as directed by Schedule 3A of the RMA, and that the Proposed Plan Change seeks to provide further direction in respect of how a well-functioning urban environment might be achieved through the addition of further clauses. In this regard, Transpower does not oppose supplementing the mandatory text, but considers that the Objective, as notified, does not reflect the critical role qualifying matters also play in achieving a well-functioning urban environment. Transpower seeks that the Objective be further amended to recognise the role that providing for qualifying matters play in achieving a well-functioning urban environment by borrowing the expression used in 3.33 of the NPSUD. Further, it is considered that the inclusion of reference to qualifying matters within Chapter 3 gives an	<b>Amend</b> Objective 3.3.7 as follows:  <b><u>3.3.7 Objective – Well-functioning urban environment</u></b>  <b><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></b>  <b><u>i. Within commercial and residential zones, a distinctive, legible urban form and strong sense of place, expressed through:</u></b>  <b><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></b>

Provision	Support/ Oppose	Submission/Reasons	Decision Sought
		appropriate platform for the subsequent provisions proposed in Sub-chapter 6.1A and the various Qualifying Matters provisions that are introduced by that Sub-chapter.	<p><i>B. <u>Appropriate scale, form and location of buildings when viewed in context of the city’s natural environment and significant open spaces, providing for:</u></i></p> <p><i>I. <u>Larger scale development where it can be visually absorbed within the environment; and</u></i></p> <p><i>II. <u>Lower heights and design controls for development located in more sensitive environments;</u></i></p> <p><i>C. <u>The pre-eminence of the city centre built form, supported by enabling the highest buildings;</u></i></p> <p><i>D. <u>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></i></p> <p><i>E. <u>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></i></p> <p><i>ii. <u>Development and change over time, including amenity values, in response to the diverse and changing needs of people, communities and future generations;</u></i></p> <p><i>iii. <u>The cultural traditions and norms of Ngāi Tahu manawhenua; and</u></i></p> <p><i>iv. <u>The benefits of urban environments that support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change; and</u></i></p> <p><i>x. <u>The specific characteristics of qualifying matters.”</u></i></p>
<b>Chapter 5 Natural Hazards</b>			
5.2.2.5.1 Policy – Managing development in Qualifying Matter Coastal Hazard Management Areas	<b>Oppose</b>	Transpower opposes Policy 5.2.2.5.1 to the extent that the Policy, as notified, is not sufficiently clear in respect of how and what activities the Policy directs are to be avoided. That is, clause (a) could have the effect of sterilizing the area subject to the Qualifying Matter Coastal Hazard Management Areas by preventing any, and all, activities. Such an approach is inconsistent with the purpose of the Proposed Plan Change and the statutory direction in respect of IPIs.	<p><b>Amend</b> Policy 5.2.2.5.1 as follows:</p> <p><b><u>“5.2.2.5.1 Policy – Managing residential development in Qualifying Matter Coastal Hazard Management Areas</u></b></p> <p><i>a. <u>Within the following Qualifying Matters, development, subdivision and land use that would provide for residential intensification of any site shall be avoided, unless the risk is from coastal inundation</u></i></p>

Provision	Support/ Oppose	Submission/Reasons	Decision Sought						
		Further, Transpower considers that 5.2.2.1.3 Policy — Infrastructure provides sufficient and appropriate policy direction in respect of infrastructure activities in areas subject to hazards and therefore concludes that the District Plan should be clear that Policy 5.2.2.5.1 does not apply to all activities, and specifically does not apply to infrastructure activities.	<p><u>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>...</p> <p><u>b. Replacement buildings, accessory buildings and extensions/additions to buildings are enabled where effects are mitigated to an acceptable level based on a site specific assessment, and having regard to the level and timing of the hazard. This could be by use of an appropriate risk based trigger or alternative methods."</u></p>						
5.2.2.5.2 Policy – Managing development within Qualifying Matter Tsunami Management Area	<b>Oppose</b>	<p>Transpower opposes Policy 5.2.2.5.2 to the extent that the Policy, as notified, is not sufficiently clear in respect of how and what activities the Policy directs are to be avoided. That is, clause (a) could have the effect of sterilizing the area subject to the Qualifying Matter Tsunami Management Area by preventing any, and all, activities. Such an approach is inconsistent with the purpose of the Proposed Plan Change and the statutory direction in respect of IPIs.</p> <p>Further, Transpower considers that 5.2.2.1.3 Policy — Infrastructure provides sufficient and appropriate policy direction in respect of infrastructure activities in areas subject to hazards and therefore concludes that the District Plan should be clear that Policy 5.2.2.5.2 does not apply to all activities, and specifically does not apply to infrastructure activities.</p>	<p><b>Amend</b> Policy 5.2.2.5.2 as follows:</p> <p><b><u>"5.2.2.5.2 Policy – Managing residential development within Qualifying Matter Tsunami Management Area</u></b></p> <p><b><u>a. Within the Tsunami Management Area Qualifying Matter, avoid residential development, subdivision and land use that would provide for intensification of any site, unless the risk to life and property is acceptable."</u></b></p>						
5.4A Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area 5.4A.1 Permitted activities	<b>Oppose</b>	<p>Transpower opposes 5.4A Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area on the basis that the Rules could apply to utilities and, in such circumstances, would not provide a consent pathway for utilities that is consistent with the District Plan approach to utilities in hazard areas in the operative provisions in Chapter 5. That is, where utilities are generally permitted.</p> <p>Transpower considers that, should the Rules apply to utilities, such an approach is inconsistent with the purpose of the Proposed Plan Change and the statutory direction in respect of IPIs and does not give effect to</p>	<p><b>Amend</b> 5.4A Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area as follows:</p> <p><b><u>"5.4A.1 Permitted activities</u></b></p> <p><b><u>a. There are no permitted activities.</u></b></p> <p><b><u>The activities listed below are permitted activities.</u></b></p> <table border="1"> <thead> <tr> <th><u>Activity</u></th> <th><u>Activity specific standards</u></th> </tr> </thead> <tbody> <tr> <td><u>Px</u></td> <td><u>Utilities</u></td> </tr> <tr> <td></td> <td><u>Nil</u></td> </tr> </tbody> </table>	<u>Activity</u>	<u>Activity specific standards</u>	<u>Px</u>	<u>Utilities</u>		<u>Nil</u>
<u>Activity</u>	<u>Activity specific standards</u>								
<u>Px</u>	<u>Utilities</u>								
	<u>Nil</u>								

Provision	Support/ Oppose	Submission/Reasons	Decision Sought								
		higher order or operative provisions including 5.2.2.1.3 Policy – Infrastructure.									
<b>Chapter 6 General Rules and Procedures</b>											
<b>Sub-chapter 6.1A Qualifying Matters</b>											
6.1A.1 Application of qualifying matters	<b>Support</b>	Except as set out below in respect of Table 1 – Qualifying Matters, Transpower generally supports the introductory text in 6.1A.1 to the extent that the text appropriately reflects the direction given in the NPSUD in respect of the role, and effect, of qualifying matters.	<b>Retain</b> the introductory text in 6.1A.1 as notified.								
6.1A.1 Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3	<b>Support in part</b>	<p>Transpower supports the inclusion of the following provisions in Table 1 for the reasons set out earlier in this submission:</p> <ul style="list-style-type: none"> <li>14.4.1.5 NC6 – NC7 National Grid transmission and distribution lines;</li> <li>14.5.1.5 NC2 – NC3 National Grid transmission and distribution lines;</li> <li>14.7.1.5 NC2 National Grid transmission and distribution lines;</li> <li>14.12.1.5 NC1 – NC2 National Grid transmission and distribution lines;</li> <li>15.4.1.5 NC3 National Grid transmission and distribution lines;</li> <li>15.5.1.5 NC3 National Grid transmission and distribution lines; and</li> <li>15.10.1.5 NC2 National Grid transmission and distribution lines.</li> </ul> <p>Transpower’s support is on the basis that the rules listed above include the National Grid Yard rules that apply to all residential and commercial zones that are traversed by the National Grid and also subject to the Proposed Plan Change.</p> <p>Transpower opposes Table 1 on the basis that the Table fails to identify the National Grid Subdivision Corridor (as associated provisions) as a qualifying matter. For the reasons set out earlier in this submission, and in order to give effect to Policy 4 of the NPSUD and Policies 10 and 11 of the NPSET, Transpower seeks that Table 1 be amended to include reference to Rule 8.5.1.3 RD5. In this regard, it is noted that the Appendix 3 to Part 2 of the Section 32 Reports ‘Carry Over Qualifying Matters, Operative Christchurch District Plan - Plan Change 14’ makes reference to the National Grid Subdivision Corridor provisions and does</p>	<p><b>Amend</b> Table 1 as follows:</p> <table border="1"> <tr> <td><u>Qualifying matter rule reference</u></td> <td><u>Type of the qualifying matter (RMA s771 or s770)</u></td> </tr> <tr> <td colspan="2" style="text-align: center;"><u>Chapter 8 Subdivision, Development and Earthworks</u></td> </tr> <tr> <td colspan="2" style="text-align: center;"><u>Safe or efficient operation of nationally significant infrastructure (Electricity Transmission Corridors)</u></td> </tr> <tr> <td><u>8.5.1.3 RD5 and 8.5.1.5 NC2 National Grid transmission lines</u></td> <td><u>Section 771(e) matter</u></td> </tr> </table>	<u>Qualifying matter rule reference</u>	<u>Type of the qualifying matter (RMA s771 or s770)</u>	<u>Chapter 8 Subdivision, Development and Earthworks</u>		<u>Safe or efficient operation of nationally significant infrastructure (Electricity Transmission Corridors)</u>		<u>8.5.1.3 RD5 and 8.5.1.5 NC2 National Grid transmission lines</u>	<u>Section 771(e) matter</u>
<u>Qualifying matter rule reference</u>	<u>Type of the qualifying matter (RMA s771 or s770)</u>										
<u>Chapter 8 Subdivision, Development and Earthworks</u>											
<u>Safe or efficient operation of nationally significant infrastructure (Electricity Transmission Corridors)</u>											
<u>8.5.1.3 RD5 and 8.5.1.5 NC2 National Grid transmission lines</u>	<u>Section 771(e) matter</u>										

Provision	Support/ Oppose	Submission/Reasons	Decision Sought
		not include a conclusion that the Subdivision Corridor be treated differently from the National Grid Yard (and provisions) that are qualifying matters.	
<b>Sub-chapter 6.10A Tree Canopy Cover and Financial Contributions</b>			
6.10A.2.1.3 Policy – Tree health and infrastructure	<b>Support in part</b>	Transpower generally supports 6.10A.2.1.3 Policy – Tree health and infrastructure but seeks limited amendments to ensure that the tree planting directed by the Policy does not compromise the National Grid in a manner that would not give effect to Policy 10 of the NPSET. It is noted that such an approach is consistent with advice notes that reference the Electricity (Hazards from Trees) Regulations 2003.	<b>Amend</b> 6.10A.2.1.3 Policy – Tree health and infrastructure as follows: <i><u>“a. Ensure that trees on a development site are planted in a position appropriate to the tree type and in sufficient soil volume, width and depth to maximise the tree’s healthy growth while minimising future nuisance effects and avoiding adverse effects on strategic infrastructure. ...”</u></i>
6.10A.4.1.1 Permitted activities Rule P1 and P2	<b>Support in part</b>	Transpower does not oppose the Rules in 6.10A.4.1.1 but seeks that the Rules include an advice note that references the Electricity (Hazards from Trees) Regulations 2003 in order to give effect to Policy 10 of the NPSET and ensure that future compliance with the Regulations is achieved. The wording, as an advice note, mirrors the advice note included in the operative provisions in Chapter 14 of the District Plan.	<b>Amend</b> 6.10A.4.1.1 Permitted activities Rule P1 and P2 to include the following as an advice note: <i><u>“Advice Note: Vegetation to be planted around the National Grid should be selected and/or managed to ensure that it will not result in that vegetation breaching the Electricity (Hazards from Trees) Regulations 2003.”</u></i>
<b>Chapter 8 Subdivision, Development and Earthworks</b>			
8.2.6.3 Policy – Tree health and infrastructure	<b>Support in part</b>	Transpower generally supports 8.2.6.3 Policy – Tree health and infrastructure but seeks limited amendments to ensure that the tree planting directed by the Policy does not compromise the National Grid in a manner that would not give effect to Policy 10 of the NPSET. It is noted that such an approach is consistent with advice notes that reference the Electricity (Hazards from Trees) Regulations 2003.	<b>Amend</b> 8.2.6.3 Policy – Tree health and infrastructure as follows: <i><u>“a. Ensure that trees on the development site are planted in a position appropriate to the tree type and in sufficient soil volume, width and depth to maximise the tree’s healthy growth while avoiding adverse effects on strategic infrastructure. ...”</u></i>
<b>Chapter 10 Designations and Heritage Orders</b>			
U3 Islington Substation, National Grid Operating Centre and National Grid Skills Training and Trial Facility	<b>Support</b>	The Proposed Plan Change seeks to amend the underlying zoning of Designation U3 (for which Transpower is the requiring authority) from Residential Suburban Zone to Medium Density Residential Zone. Transpower acknowledges that this change is as a consequence of the IPI. As such, the amendment to Designation U3 is not opposed.	<b>Retain</b> the underlying zoning of Designation U3 as notified.

Provision	Support/ Oppose	Submission/Reasons	Decision Sought
<b>Chapter 14 Residential</b>			
14.1 Introduction	<b>Support in part</b>	Transpower generally supports the text in 14.1 Introduction, but seeks limited amendments to reflect that, in some cases, qualifying matters may mean that any residential intensification is inappropriate (as opposed to being intensification being reduced), as is the case in respect of the National Grid Yard qualifying matter provisions.	<b>Amend</b> 14.1 Introduction as follows: <p><i>“...e. <u>A number of the provisions in this chapter give effect to the requirements of the Act and the National Policy Statement on Urban Development to provide for intensification in urban areas, including by implementing the Medium Density Residential Standards. However, the Act enables those intensification requirements to be reduced where justified by a “qualifying matter”. In this chapter the reduction in intensification, including the avoidance of intensification in some cases, due to qualifying matters has been implemented in two ways: by having the Medium Density Residential or High Density Residential zones, but enabling lesser, or no further, intensification than the Medium Density Residential Standards require in the areas or sites in those zones where a qualifying matter applies; or by having a lower density residential zone, for example the Residential Suburban or Residential Hills Zone, because the rules for that zone provide the level of density that the qualifying matter necessitates. Further information on qualifying matters can be found in 14.3, How to interpret and apply the rules, sub-clause q.”</u></i></p>
14.2.3 Objective - MDRS Objective 2	<b>Support</b>	Transpower supports 14.2.3 Objective MDRS Objective 2 noting it reflects that required under Schedule 3A Part 1(6)(2) of the RMA-EHS.	<b>Retain</b> 14.2.3 Objective MDRS Objective 2 as notified.
14.2.3.1 Policy - MDRS Policy 1	<b>Support in part</b>	Qualifying matters, including the National Grid Yard provisions, limit the amount of permitted medium density development possible on an allotment. While the policy directive within Policy 14.2.3.1 is supported (and reflects Schedule 3A, Part 1, clause (6)(2)(a) of the RMA), Transpower supports reference to qualifying matter areas as they directly influence the capacity for intensification and residential development.	<b>Amend</b> 14.2.3.1 Policy MDRS Policy 1 as follows: <p><i>“a. <u>enable a variety of housing types with a mix of densities within the zone, including 3-storey attached and detached dwellings, and low-rise apartments, while avoiding inappropriate locations, heights and densities of buildings and development within qualifying matter areas as directed by the relevant qualifying matter provisions.</u></i>”</p>
14.2.3.2 Policy - MDRS Policy 2	<b>Support</b>	Transpower supports 14.2.3.2 Policy – MDRS Policy 2 (noting it reflects that required under Schedule 3A Part 1(6)(2) of the RMA-EHS) in that it recognises qualifying matters.	<b>Retain</b> 14.2.3.2 Policy – MDRS Policy 2 as notified.



Provision	Support/ Oppose	Submission/Reasons	Decision Sought
14.2.3.3 Policy - MDRS Policy 5	<b>Support</b>	Transpower supports 14.2.3.3 Policy MDRS Policy 5 noting it reflects that required under Schedule 3A Part 1(6)(2) of the RMA-EHS.	<b>Retain</b> 14.2.3.3 Policy MDRS Policy 5 as notified.
14.2.6.1 Policy – MDRS Policy 1	<b>Support in part</b>	Qualifying matters, including the National Grid Yard provisions, limit the amount of permitted medium density development possible on an allotment. While the policy directive within Policy 14.2.6.1 is supported (and reflects Schedule 3A, Part 1, clause (6)(2)(a) of the RMA), Transpower supports reference to qualifying matter areas as they directly influence the capacity for intensification and residential development.	<b>Amend</b> 14.2.6.1 Policy MDRS Policy 1 as follows: <i>“a. <u>enable a variety of housing types with a mix of densities within the zone, including 3-storey attached and detached dwellings, and low-rise apartments, while avoiding inappropriate locations, heights and densities of buildings and development within qualifying matter areas as directed by the relevant qualifying matter provisions.</u>”</i>
14.2.7.1 Policy – Provide for a high density urban form	<b>Support in part</b>	Qualifying matters, including the National Grid Yard provisions, may limit the amount of high density development possible on an allotment. For this reason, Transpower supports reference to qualifying matter areas as they directly influence the capacity for intensification and residential development.	<b>Amend</b> 14.2.7.1 Policy – Provide for a high density urban form as follows: <i>“a. <u>Except where limited by a qualifying matter e</u>Enable the <u>development of high density urban areas with a density that is responsive to current and planned:</u> <u>i. degree of accessibility to services and facilities, public open space, and multimodal and active transport corridors; and</u> <u>ii. housing demand.</u>”</i>
14.3 How to interpret and apply the rules	<b>Support</b>	Transpower supports the clear direction given in clause (f) that qualifying matters apply (including in respect of the National Grid). It is considered that clause (f) clearly and succinctly assists plan users.	<b>Retain</b> 14.3 How to interpret and apply the rules as notified.
<b>Chapter 15 Commercial</b>			
15.3 How to interpret and apply the rules	<b>Oppose</b>	Transpower notes that the Proposed Plan Change includes amendments to Chapter 15 and also identifies the National Grid Yard provisions in Chapter 15 as a qualifying matter. For this reason, it is considered that the clear direction given in 14.3(f) is replicated in 15.3.	<b>Amend</b> 15.3 How to interpret and apply the rules to include the same or similar direction as given in 14.3.
<b>Section 32 Report</b>			
Section 32 Report	<b>Support</b>	Transpower generally supports the analysis of the National Grid as an existing qualifying matter in the Section 32 Report, including Appendix 3 to Part 2 of the Section 32 Reports ‘Carry Over Qualifying Matters, Operative Christchurch District Plan - Plan Change 14’	

Provision	Support/ Oppose	Submission/Reasons	Decision Sought
<b>Planning Maps</b>			
Planning Maps: General – extent of zones and development areas	<b>Support in part</b>	Transpower is neutral on the extent (as notified) of the various zones. However, should the extent of the zones be amended in the vicinity of the National Grid, Transpower seeks that the provisions that manage effects on the National Grid that are proposed as a qualifying matter (and as amended by this submission) are similarly extended to any new areas.	
Planning Maps: National Grid Yard	<b>Support in part</b>	Transpower generally supports the mapping of the National Grid Yard as a qualifying matter. However, Transpower seeks amendments to the maps to: <ol style="list-style-type: none"> <li>1. distinguish the National Grid from electricity distribution lines on the basis that different provisions apply to the different types of infrastructure and it is helpful to plan users for this to be shown on the planning maps;</li> <li>2. make it clear that the National Grid Yard provisions are an existing qualifying matter; and</li> <li>3. include a notation/cross reference to indicate that the extent of the National Grid Yard shown on the planning maps is indicative only, with the Yard being defined by the rules in the District Plan.</li> </ol>	
Planning Maps: National Grid Subdivision Corridor	<b>Oppose</b>	Transpower opposes the Planning Maps to the extent that they do not appear to show the National Grid Subdivision Corridor (or the area subject to Rule 8.5.1.3 RD5). Transpower seeks that the Planning Maps be amended to also show this area in a similar manner to the National Grid Yard (as amended by this submission).	

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Carlin **Last name:** Rutherford

**Organisation:** Rutherford Family Trust

**On behalf of:**

**Preferred method of contact**

**Postal address:** PO Box 1959

**Suburb:**

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8014

**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

C Rutherford - Email

C Rutherford - 2023 05 12 Submission

**Jackson, Andrew**

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**From:** Carlin Rutherford <carlinrutherford@gmail.com>  
**Sent:** Friday, 12 May 2023 4:34 pm  
**To:** Engagement  
**Subject:** Submission on Plan Change 14  
**Attachments:** 2023 05 12 Submission.pdf

Submission on Plan Change 14 attached

Regards  
Carlin

Carlin Rutherford

Ph 021 1466540  
[carlinrutherford@gmail.com](mailto:carlinrutherford@gmail.com)  
PO Box 1959 Christchurch

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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\* Carlin Rutherford

Address\* PO Box 1959, Christchurch Postcode\* 8014

Email carlinrutherford@gmail.com

Phone no. \_\_\_\_\_

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

Organisation's name Rutherford Family Trust

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 12 May 2023

# Have your say

## Housing and Business Choice Plan Change 14

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

Planning Map 48; 14.7.2.1(ii)

8.6.1

Appendix 8.10.7

8.6.11 (b)(iv)

8.6.11 Table 8 (D) Refer to attached table for more detail

**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.)*

Refer to attached sheet

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

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

Refer to attached sheet



Plan Section	Support/ Oppose/ Seek amendment	My submission is that	I seek the following Decision from Council
<p>8 and 14 and Planning map 48</p> <p>More particularly:</p>	<p>Seek Amendment</p>	<p>Land: 2 Crest Lane, Mount Pleasant (Planning Map 48) (including Part Lot 48 Deposited Plan 3416, Lots 1,2, and 3 DP 6740, Lot 2 DP 334935)</p> <p>Submission point #1: <b>Confirm removal of Moncks Spur/Mt Pleasant Overlay and related (as such lack justification as qualifying matters).</b></p> <p>We support that the overlay has been removed from the interactive Maps (<i>However, reference to it still needs removed elsewhere in the rules</i>).</p> <p>CCC have confirmed to us that it is the intention the Moncks Spur/Mt Pleasant overlay be removed. Further, in the Section 32 Evaluation Report (Part 3 – Residential, pages 79 &amp; 84)), the CCC confirm the Moncks Spur/Mt Pleasant Density Overlay lacked justification as a qualifying matter.</p> <p>We seek the following:</p> <ol style="list-style-type: none"> <li>1. Remove Moncks Spur/Mt Pleasant Overlay from Map 48.</li> <li>2. Remove reference to the Moncks Spur/Mt Pleasant Overlay from rule 14.7.2.1 (ii).</li> <li>3. Remove Additional Standard (b) from Table 1, line (i) in 8.6.1</li> <li>4. Remove appendix 8.10.7 (refer 3.5.2, SECTION 32 Evaluation: Enabling Greater Building Development In Residential Areas, Moncks Spur DP to be deleted).</li> <li>5. Remove reference to the Moncks Spur Development Area in 8.6.11 (b)(iv)</li> <li>6. Remove Row (D) in table 8 in Rule 8.6.11 (d).</li> </ol> <p>All of which lack justification as qualifying matters, or prevent development in accord with the standard residential controls, or otherwise restrict flexibility to achieve the NPS-UD objectives. They are no longer appropriate in light of the NPS-UD objectives.</p>	<p>Remove the Moncks Spur/Mt Pleasant Overlay (including reference to it on <b>Planning Map 48</b>)</p> <p>Remove the reference to the Moncks Spur/Mt Pleasant Overlay in <b>14.7.2.1(ii)</b>.</p> <p>Remove Additional Standard (b) from <b>Table 1, line (i) in 8.6.1</b>,</p> <p>Remove <b>appendix 8.10.7</b>.</p> <p>Remove reference to the Moncks Spur Development Area in <b>8.6.11 (b)(iv)</b></p> <p>Remove Row (D) in table 8 in Rule <b>8.6.11 (d)</b>.</p>
<p>8 14 Planning Map 48</p>	<p>Seek Amendment</p>	<p>Submission point #2: <b>Enable Housing Choice on the land as per the NPS-UD.</b></p> <p>Where the land is marked FUZ (<i>“the Middle Land”</i>), we support the recognition of the suitability of this land for Enabling Housing and Housing Choice to help achieve NPS-UD (after removal of density overlays &amp; RH Precinct site limit). Appropriate services can be provided on this greenfield’s block from the outset to achieve housing choice and a range of smaller section sizes where appropriate to suit the changing needs of the population. For example, a number of 400sqm sites for people at a stage of their lives wanting to stay on the hill but not maintain a large garden. People will therefore be able to remain within the neighbourhood throughout their lifetime as they move to housing types that suit their life stage.</p> <p>Alternatively, if the Middle Land remains as the earlier underlying RH (and rules referred to in 1-6 in our submission point 1 herein removed), such would in assist to help accord with NPS-UD; together with other mechanisms that better enable housing and housing choice in accord with the Government’s mandate in the Enabling Act.</p> <p>We also seek to address any other consequential amendments that effect the subject property and its ability to best effect the NPS-UD</p>	<p>Ensure the zoning of the Land optimally provides for Enabling Housing and Housing Choice to better accord with NPS-UD objectives</p> <p>Subject to materials to be presented, solutions may include:</p> <p>Correct the zoning of the Middle Land to RH (together with removal of the provisions in referred to in rules referred to in 1-6 in our submission point #1 herein); together with mechanisms that ensure the Land provides for Enabling Housing and Housing Choice to better accord with NPS-UD objectives.</p> <p>OR to better achieve the objectives under NPS-UD, apply FUZ to the Middle Land, but in a manner that increases the density from RH, and enables a variety of some smaller section sizes e.g. 400sqm where appropriate, to allow housing choice as required by NPS-UD.</p>
<p>Planning Map 48</p>	<p>Seek Amendment</p>	<p>Submission #3: <b>We support not having the LPTAA over the Land.</b> LPTAA is showing over part of the residential property.</p>	<p>Remove LPTAA from the property</p>

## Extract HOUSING AND BUSINESS CHOICE – PART 3: RESIDENTIAL SUB-CHAPTER EVALUATION REPORT (pages 79,84)

**Moncks Spur/Mt Pleasant Density Overlay**

- Underlying zone is Residential Hills.
- Density required per residential unit is 850m<sup>2</sup>. This site is stated as having been subject to the LHA zoning (deferred) under the previous plan, which had a minimum net site area of 850m<sup>2</sup> and a minimum average of 1500m<sup>2</sup>. It was recommended that the site be zoned RH with a density overlay.<sup>24</sup> It therefore appears that the 850m<sup>2</sup> minimum area was rolled over from the previous Plan.
- In the previous District Plan, the densities for this area are described as being applied *"to minimise the visual effects of urban development and maintain the character of the adjacent residential area."*<sup>25</sup>
- Criteria used does not align with sub-sections a) to g) of s771, therefore cannot be a qualifying matter without meeting the tests under s771.

To summarise, those shown in **bold** are considered to be within a relevant residential zone where progressing with the density overlay would have an influence upon density (and are not considered redundant). These can be categorised as follows:

Overlays that lack justification as a qualifying matter (qualifying matter sites):

- **Monks Spur/Mt Pleasant Density Overlay**
- **Shalamar Drive Density Overlay**
- **Upper Kennedys Bush Density Overlay**



## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Fiona **Last name:** Aston

**Organisation:** Cathedral City Development Ltd

**On behalf of:**

**Preferred method of contact**

**Postal address:** PO Box 1435

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:** 8140

**Daytime Phone:** 0275 332213

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
Cathedral City Developments PC14 submission



# Submission on Proposed Plan Change 14 - Housing and Business Choice

Cathedral City Development Ltd

Christchurch City Council

**RESOURCE MANAGEMENT ACT 1991**

**CHRISTCHURCH CITY COUNCIL**

**SUBMISSION ON PLAN CHANGE 14  
HOUSING AND BUSINESS CHOICE**

**Submitter Details**

Name: Cathedral City Development Ltd

Postal address: C/- Aston Consultants Ltd  
Resource Management and Planning  
PO Box 1435  
Christchurch 8140

Email address: fiona@astonconsultants.co.nz

Phone Number: 03 3322618

Mobile Number: 0275 332213

Contact Person Fiona Aston

**We do wish to be heard in relation to our submission.**

**Specific Proposals to Which this Submission Applies:**

Proposed Plan Change 14 (PC14) in its entirety, including but not limited to zoning, qualifying matters, and activity and built form standards, in particular as they affect 85 Harry Ell Drive, Cashmere Hills, legally described as Pt Lot 1 DP 11796 (6.8ha)

**PPC 14 – Zoning & Qualifying Matters**

*Zoning*

PPC14 essentially proposes ‘upzoning’ all of the existing residential zones in the Christchurch District Plan except for the Large Lot Residential and Small Settlement Zones and where qualifying matters apply. It implements the Resource Management Enabling Housing Amendment Act 2021 (the Enabling Act), but with an amendment to the Height in Relation to Boundary rule (for which a proposed qualifying matter applies). S 77G of the Act states that:

(4) in carrying out its functions under this section, a specified territorial authority may create new residential

zones or amend existing residential zones

It contemplates rezonings under an IPI, where the outcome is residential.

#### *Low Public Transport Accessibility*

A Quality Matter relates to areas with low public transport accessibility where the Residential Suburban Zone, Residential Banks Peninsula and Residential Hills Zone and their current standards in the District Plan continue to apply. This limits the application of the Medium Density Residential Zone (and the MDRS standards) to residential areas with the following spatial characteristics:

- Residential areas within 800m walk from five High Frequency (Core) Routes
- Residential areas within 800m walk from additional bus routes with significant potential to connect employment centres together
- Residential areas more than 200m from High Density Residential Zones and the application of Policy 3 in relation to centres, snapping to the nearest city block
- Areas zoned Residential Suburban Density Transition Zone, Residential New Neighbourhoods (RNNZ) and Residential Medium Density<sup>1</sup>

Based on the PPC14 planning maps, parts of the operative NNZ have been rezoned Future Urban Zone. The MDRS do not apply to the FUZ which retains the operative NNZ standards. These require a minimum net residential density of 15 hh/ha, and minimum lot size 300m<sup>2</sup>, except that up to 20% can be between 180-299m<sup>2</sup> in area.

The justification for the Low Public Transport Accessibility Qualifying Matter (LPTA QM) is summarized as below:

This qualifying matter will provide for a level of intensification within the qualifying matter area consistent with the level of existing and likely future accessibility to employment, education and community services in these areas and promote an integrated and more efficient and effective approach to the provision of public transport and three waters network infrastructure focussed on areas most suited to enable intensification close to centres and areas with relatively strong demand. It will support well-functioning urban environments reductions in greenhouse gas emissions and support resilience to climate change effects without significantly impacting on housing affordability and competitive land and development markets.<sup>2</sup>

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<sup>1</sup> Qualifying Matters Section 32 Assessment paragraph 6.32.1

<sup>2</sup> Qualifying Matters Section 32 Assessment paragraph 6.32.49

It aligns the location of medium density development with existing and committed structural investments and cross organisational planning for the provision of public transport in Greater Christchurch, including as set out in the Greater Christchurch Public Transport Combined Business Case 2020 (the PT Combined Business Case).<sup>3</sup>

The LPTA QM is opposed, as contrary to the intent and purpose of the Enabling Act and National Policy Statement – Urban Development 2020. It will frustrate the overall intent and purpose of the the legislation and NPS-UD to facilitate the deliver of increased housing supply and quality urban environments, by substantially restricting the opportunities for intensification.

### **Relief Sought**

- 1) Delete the notified PC14 LPTA QM and all related provisions.
- 2) Rezone 85 Harry Ell Drive MDR as identified on Figure 1 below and legally described as Pt Lot 1 DP 11796 (6.8ha) Medium Density Residential or Future Urban Zone.

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<sup>3</sup> Qualifying Matters Section 32 Assessment paragraph 6.32.11

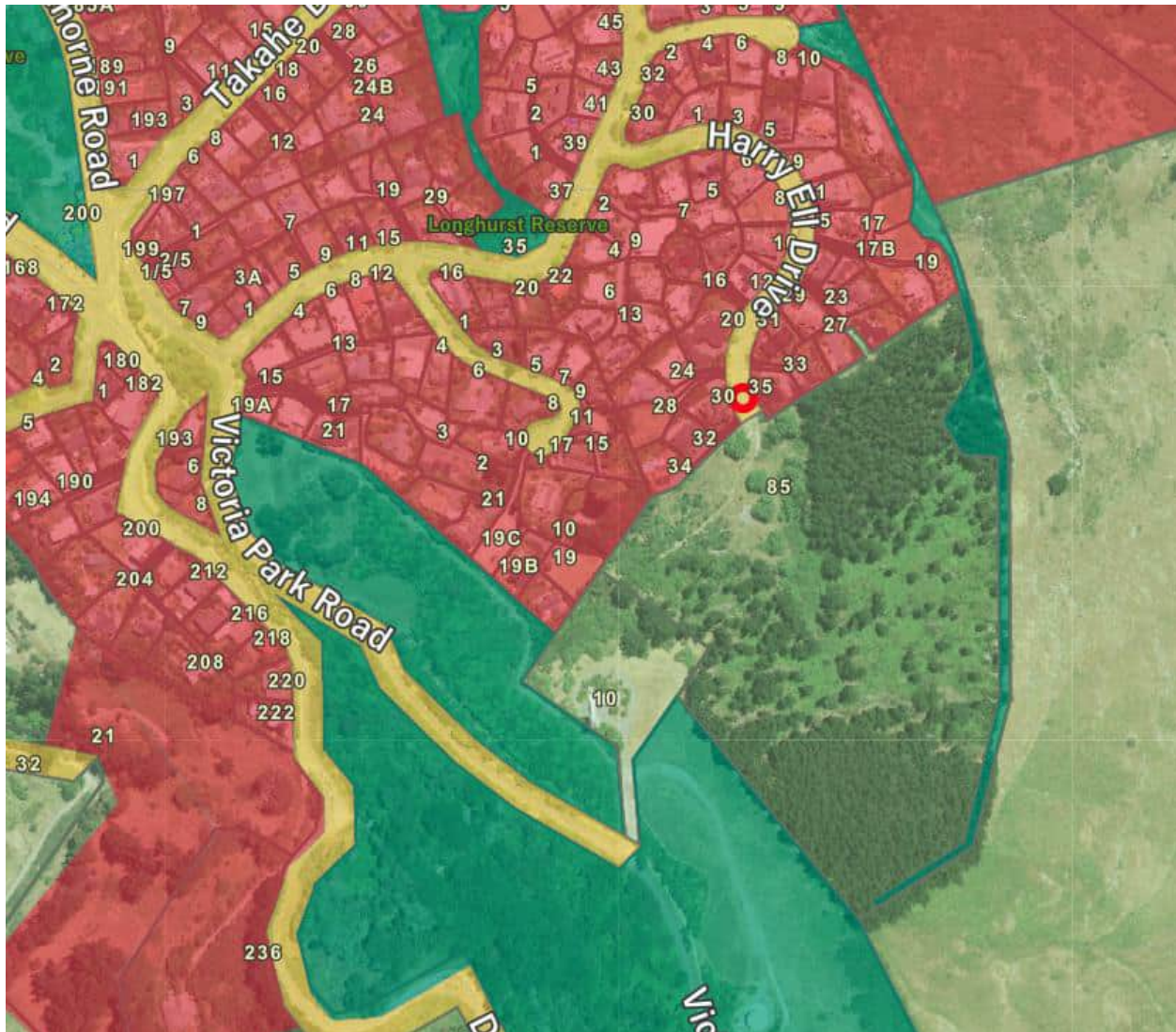


Figure 1: Land at 85 Harry Ell Drive proposed to be rezoned (land coloured red currently zoned for urban residential purposes)

- 3) All consequential, further or alternative amendments to PPC14 to be consistent with and give effect to the intent of this submission and the interests of the Submitter, including but not limited to amendments to Chapter 6.1A Qualifying Matters, Chapter 8 Subdivision, Development and Earthworks, Chapter 14 Residential, and addition of an Outline Development Plan for the area sought to be rezoned by this submission.

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.....  
(Signature of applicant or person authorized to sign on behalf of the applicant)

Date: May 12, 2023

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Fiona **Last name:** Aston

**Organisation:** Red Spur Ltd

**On behalf of:**

**Preferred method of contact** Email

**Postal address:** PO Box 1435

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:** 8140

**Email:** fiona@astonconsultants.co.nz

**Daytime Phone:** 027 5332213

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

final notified PPC14 Red Spur submission





# Submission on Proposed Plan Change 14 - Housing and Business Choice

Red Spur Ltd

Christchurch City Council

**RESOURCE MANAGEMENT ACT 1991****CHRISTCHURCH CITY COUNCIL****SUBMISSION ON PLAN CHANGE 14  
HOUSING AND BUSINESS CHOICE****Submitter Details**

Name: Red Spur Ltd

Postal address: C/- Aston Consultants Ltd  
Resource Management and Planning  
PO Box 1435  
Christchurch 8140

Email address: fiona@astonconsultants.co.nz

Phone Number: 03 3322618

Mobile Number: 027 5332213

Contact Person Fiona Aston

**Specific Proposals to Which this Submission Applies:**

Proposed Plan Change 14 (PC14) in its entirety, including but not limited to zoning, subdivision, activity and built form standards, qualifying matters and tree canopy provisions, in particular as they affect Redmund Spur. For background and context see Attachment 1 to this submission.

**Submission:****Opposes the following proposed provisions**

PC14 in its entirety, including but not limited to zoning, activity, subdivision, built standards and qualifying matters, in particular as they affect Redmund Spur, and in particular the proposed 'downzoning' of Redmund Spur to LLR.

**We do wish to be heard in support of our submission****The decision the Submitter seeks from the Council is:**

## Relief Sought

- A** If the proposed Low Public Transport Accessibility Qualifying Matter (LPTA QM) is retained in the P14 decision, zone Redmund Spur (except for the Neighbourhood Centre), Residential Hills (the current zoning of the Site) subject to the operative RH zone provisions, except that the RH (Redmund Spur) Precinct provisions as described below shall apply.
- B** If the LPTA QM is **not** retained in the PC14 decision, rezone Redmund Spur MDR and subject to the RH (Redmund Spur) Precinct provisions below.
- C** PC14 rules and other provisions are consistent with the requirements of the Resource Management Enabling Housing (and other matters) Amendment Act, including but not limited to Clauses 3-8 relating to subdivision, including the requirement for subdivision provisions to be consistent with the level of development permitted under the other clauses of Schedule 3A, and provide for subdivision applications as a controlled activity.

In both cases, subject to C above, add the RH (Redmund Spur) Precinct Provisions:

- a minimum vacant lot size for a maximum of 15% of lots for the entire Redmund Spur of 400m<sup>2</sup>; and
- for the balance lots, a minimum vacant lot size of 650m<sup>2</sup>
- for lots under 650m<sup>2</sup> net area, a maximum site coverage of 50%

For clarity, there shall be no other additional rules (I.e. in addition to the RH/MDRZ rules) in the RH (Redmund Spur) Precinct.

Give effect to the above by amending PPC14 as below. Amendments sought by submitter highlighted yellow.

### Chapter 8 Subdivision

#### Rule 8.6.1 Minimum net site area and dimension

	<u>Zone</u>	<u>Minimum net site area</u>	<u>Additional standards</u>
b.	<u>Residential Hills/Medium Density Residential Zone –</u>	<u>650m<sup>2</sup> for a vacant allotment except that in the Residential Hills (Redmund Spur) Precinct, a</u>	a. An identified building area must be shown on the scheme plan of subdivision on every

	<b>Residential Hills Precinct</b>	<b>maximum of 15% of vacant lots for the entire Precinct shall have a minimum lot size of 400m<sup>2</sup>.</b>	allotment on which a residential unit is anticipated
<u>h.</u>	<del>Residential—Large Lot Residential</del>	1500m <sup>2</sup>	<del>e. In the Residential Mixed Density Precinct—Redmund Spur;</del> <del>i. the minimum allotment size shall be 650m<sup>2</sup>;</del> <del>however a minimum of 30% of sites shall have a minimum of 1,500m<sup>2</sup>;</del> <del>and</del> <del>ii. the maximum number of allotments shall be 400.</del>

#### Rule 8.6.2 Allotments with existing or proposed buildings

	<u>Zone</u>	<u>Minimum net site area</u>
<u>j.</u>	<b>Residential Hills/ Medium Density Residential Zone - Residential Hills (Redmund Spur) Precinct</b>	<b>No minimum</b>

#### Chapter 14 Residential

Delete the reference to Redmund Spur in the Large Lot Zone Description (14.2.1.1 Policy – Housing distribution and density, Table 14.2.1.1a) as below

Covers a number of areas on the Port Hills where there is an existing residential settlement that has a predominantly low density or semi-rural character as well as the Akaroa Hillslopes and rural residential areas of Samarang Bay and Allandale on Banks Peninsula, **and a low density hamlet centred on the northern part of Gardiners Road, Redmund Spur, and 86 Bridle Path Road.**

Correct Table 14.2.1.1a Residential Hills zone description to include the current operative RH zones west of Westmorland as below

Covers all the living environments that are located on the slopes of the Port Hills from **Westmorland Quarry Hill** in the west to Scarborough in the east.

Consequential amendments to Table 14.2.1.1a if the LPTA QM is not retained or is amended including to the zone description for the RHZ (which for the most part will be zoned MDR).

Delete 14.2.5.11 Policy – managing site specific Residential Large Lot development a. ii (which refers to the Redmund Spur area) as below

14.2.5.11 Policy – Managing site-specific Residential Large Lot development

a. Enable development within mixed density precincts in a way that:...

~~ii. Within the Redmund Spur area, provides for a mixture of low-density residential and rural residential living opportunities; and~~

Residential Hills Zone Rules:

14.7.2.1 Site Density

	Activity/Area	Standard
<b>iii</b>	<b>Residential Hills/MDRZ (Redmund Spur Precinct)</b>	<b>No minimum</b>

14.7.2.3 Site coverage

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

	Activity/Area	Standard
<b>iv.</b>	<b>Within the Residential Hills (Redmund Spur Precinct)</b>	<b>Sites under 650m<sup>2</sup> net site area – 50%</b>

14.7.1.3 Restricted discretionary activities

	Activity	The Council's discretion shall be limited to the following matters
<b>RD20</b>	<del>a. Within the Residential Hills Mixed Density Overlay, any activity that does not meet Rule 14.7.2.1 Site density. b. Any application arising from this rule shall not be limited or publicly notified.</del>	<del>a. Scale and nature of activity – Rule 14.15.5 b. Traffic generation and access safety – Rule 14.15.6 12 c. Residential design principles – Rule 14.15.1.g – Hillside and small settlement areas (Plan Change 5D Council Decision)</del>
<b>RD21</b>	<del>a. Within the Residential Hills Mixed Density Overlay, the creation of any attached residential units where the total floor area is greater than 500m<sup>2</sup> b. Any application arising from this rule shall not be limited or publicly notified</del>	<del>a. Residential design principles – Rule 14.15.1</del>

Residential Large Lot Zone Rules:

14.9.2.1 Site **and precinct** density

a. Each residential unit shall be contained within its own separate site. The site shall have a minimum net site area as follows:

	Area	Standard
viii.	<del>Residential Mixed Density Precinct</del> Redmund Spur	1. 650m <sup>2</sup> per residential unit. 2. The maximum number of lots shall be 400. 3. A minimum of 30% of sites shall have a minimum net site area of 1500m <sup>2</sup> .

14.9.2.3 Site coverage

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

	Zone/activity	Standard
viii.	<del>Residential Mixed Density Precinct</del> Redmund Spur	1. For sites greater than 1000m <sup>2</sup> – 25% or 250m <sup>2</sup> of ground floor area to a maximum of 350m <sup>2</sup> in total floor area. 2. For sites less than 450m <sup>2</sup> the maximum site coverage shall be 45%

14.9.2.5 Minimum building setbacks from internal boundaries

a. The minimum building setback from internal boundaries shall be as follows:	Activity/area
viii	Within the Residential Mixed Density Precinct – 86 Bridle Path Road, <del>Residential Mixed Density Precinct – Redmund Spur</del> , and Rural Hamlet Precinct, the following standards apply:

14.9.2.6 Road boundary building setback

a. The minimum road boundary building setback shall be:

	Area	Standard
vii.	Within the Residential Mixed Density Precinct – 86 Bridle Path Road, Residential Mixed Density Precinct – Redmund Spur	4 metres

**b. The following exemptions apply for the Residential Mixed Density Precinct – 86 Bridle Path Road, Residential Mixed Density Precinct – Redmund Spur, and Rural Hamlet Precinct:**

**14.9.2.10 Minimum setback for living area windows and balconies facing internal boundaries**

**a. Within the Residential Mixed Density Precinct – 86 Bridle Path Road, Residential Mixed Density Precinct – Redmund Spur, and Rural Hamlet Precinct, the following standards apply:**

- i. The minimum setback for living area windows and balconies at first floor from an internal boundary shall be 4 metres.**
- ii. Where the window is adjacent to an access way, the setback shall be measured from the far side of the access way.**

**14.9.2.11 Service, storage and waste management spaces**

**a. Within the Residential Mixed Density Precinct – 86 Bridle Path Road, Residential Mixed Density Precinct – Redmund Spur, and Rural Hamlet Precinct, for multi-unit residential complexes and social housing complexes:**

- i. each residential unit shall be provided with at least 2.25m<sup>2</sup> with a minimum dimension of 1.5 metres of outdoor or indoor space at ground floor level for the dedicated storage of waste and recycling bins;**
- ii. each residential unit shall be provided with at least 3m<sup>2</sup> with a minimum dimension of 1.5 metres of outdoor space at ground floor level for washing lines; and**
- iii. the required spaces in i. and/or ii. for each residential unit shall be provided either individually, or within a dedicated shared communal space.**

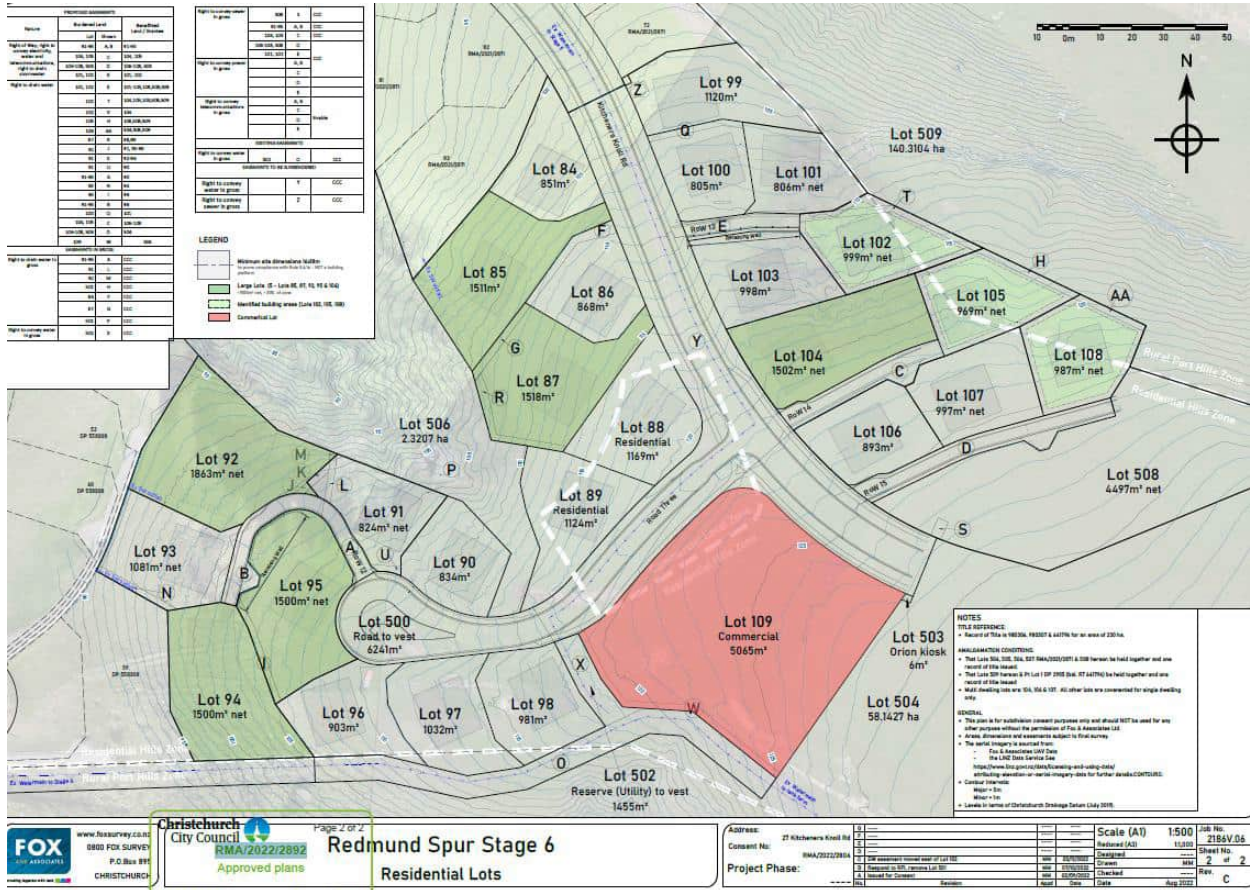
**14.9.2.12 Street scene amenity and safety – fences**

**a. Within the Residential Mixed Density Precinct – 86 Bridle Path Road, Residential Mixed Density Precinct – Redmund Spur, and Rural Hamlet Precinct, for multi-unit residential complexes and social housing complexes:**

- i. The maximum height of any fence in the required building setback from a road boundary shall be 1.8 metres.**







Amend 15.2.2.1 Policy – Role of centres Table 15.1 – Centre’s role as below:

	Role	Centre and size (where relevant)
E		All other commercial centres zoned Commercial Local Neighbourhood Centre Zone. Size: Up to 3,000m <sup>2</sup> <b>excluding Redmund Spur</b> <b>Redmund Spur – 5100m<sup>2</sup></b>

Any consequential, further or alternative amendments to PPC14 to be consistent with and give effect to the intent of this submission and the interests of the Submitter.

## Reasons for Relief Sought

- 1) The relief sought is consistent with and gives effect to the Resource Management Act 1991 (RMA), including the Enabling Housing (and other matters) amendments, and in terms of s32 of the RMA is the most appropriate way for achieving the purpose of the objectives of the proposal (including any consequential amendments to the same to give effect to the purpose and intent of this submission).
- 2) Redmund Spur is zoned RH in the current operative Christchurch District Plan. The Enabling Act requires all existing zones except LLR and SSZ to incorporate the MDRS. The proposal to 'downzone' Redmund Spur to LLR is contrary to the Enabling Act and not legally possible. There is simply no scope under the Act for the proposed downzoning.
- 3) The existing District Plan density provisions applying to the Redmund Spur Overlay enable an overall residential density 'closer' to the RH zoning applying elsewhere (minimum lot size 650m<sup>2</sup>) than the LLR zone (minimum lot size 1500m<sup>2</sup>). The average lot size based on a maximum of 400 lots, and minimum 30% 1500m<sup>2</sup> is appx 900m<sup>2</sup>.
- 4) RH zoning for Redmund Spur (in the event that the LPTA QM is retained) is consistent with the proposed RH zoning for the neighbouring Quarry Hill subdivision to the west, which also has an overall lower average density (1500m<sup>2</sup>) than Redmund Spur (appx 900m<sup>2</sup>).
- 5) The topography of Redmund Spur includes large areas of gently sloping land which are suitable for some smaller lots. The existing operative RS Mixed Density Overlay rules package recognizes this and anticipates some smaller sites. A higher (45%) site coverage applies for smaller sites (under 450m<sup>2</sup>) - Rule 14.7.2.3 Site Coverage. Provision for smaller lots will enable this emerging hill suburb to deliver a wider range housing types and price points than other hills suburbs (where the minimum vacant lot size is 650m<sup>2</sup>), consistent with the NPS-UD 2020 requirement for well functioning urban environments to meet the needs, in terms of type, price, and location, of different households (Policy 1), including smaller, more affordable housing.
- 6) The amendments to the residential zone boundaries are minor in nature and ensure that

the zoning better fits the site topography than the existing zone boundaries which relate to existing fencelines and/or other non-topographical features. Land currently zoned Residential Hills but which is topographically unsuited for residential development will be rezoned Rural Port Hills (2960m<sup>2</sup>) and land currently zoned RPH but which is suitable for residential development will be rezoned RH (Redmund Spur Precinct) or MDR (Redmund Spur Precinct) (2100m<sup>2</sup>) slightly reducing the amount of land zoned for residential purposes.

- 7) The amendments to the NCZ boundary and Table 15.1 is consistent with the approved Stage 6 subdivision scheme plan, and the location of the NCZ approved under RMA/2022/2892.
- 8) There is no need to continue with the current RHMDO rules package, which in some parts is inconsistent with the Enabling Act. These include the requirement for a proportion of larger lots and site coverage requirements including as below
  - For sites greater than 1000m<sup>2</sup> – the lesser of 25% or 250m<sup>2</sup> of ground floor area to a maximum of 350m<sup>2</sup> in total floor area (Rule 14.7.2.3)
  - Restricted discretionary activity consent required for attached residential units where the total floor area is greater than 500m<sup>2</sup> (RD21)

The site coverage requirements for larger sites have proven problematic in practice, with variable interpretation and application by consenting officers concerning matters of visual appropriateness of site coverage on the larger lots. The maximum site coverage under the MDRS is 50% as stipulated in the Enabling Act, and 35% in the current operative RHZ. It is not appropriate that a different standard apply to development at Redmund Spur compared with other RH zoned areas (with respect to sites 650m<sup>2</sup> and larger). Further, the Enabling Act (Policy 6) anticipates changes to character of the urban environment with the proposed intensification, which applies to virtually all residential zones including RH. Such changes are not to be considered of themselves an adverse effect, which needs mitigation.

Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:

(b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:

- (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and
- (ii) are not, of themselves, an adverse effect

9) Market feedback is that lot sizes of 1500m<sup>2</sup>+ are larger than desired.

10) The current District Plan RH zoning of Redmund Spur (to apply in the event that the LPTA QM is not retained) is consistent with the purpose and intent of the RHZ as described in the District Plan under Policy 14.2.2.1 Housing distribution and density Table 14.2.1.1a, and conversely inconsistent with the purpose of LLR as described in the Table.

#### Residential Hills Zone

Covers all the living environments that are located on the slopes of the Port Hills from Westmorland in the west to Scarborough in the east. (an amendment is sought to correct this to reference Quarry Hill as the westernmost RHZ). It provides principally for low density residential development that recognises the landscape values of the Port Hills, including opportunities for planting and landscaping, and control of reflectivity of roof finishes in order to blend buildings into the landscape. Provision is made for a range of housing options that will enable a typical family home to be retained, but also provide greater housing stock for dependent relatives, rental accommodation, and homes more suitable for smaller households (including older persons). Provision is also made for a range of appropriate non-residential activities.

#### Residential Large Lot Zone

Covers a number of areas on the Port Hills where there is an existing residential settlement that has a predominantly low density or semi-rural character as well as the Akaroa Hills slopes and rural residential areas of Samarang Bay and Allandale on Banks Peninsula , **and a low density hamlet centred on the northern part of Gardiners Road, Redmund Spur, and 86 Bridle Path Road.**

The RLLZs are discrete outlying residential areas on Banks Peninsula or in the rural area north of the city (Gardiners Road). Bridle Path Road has subdivision approval and is being developed as a mixed density area (10 lots). Redmund Spur is not an outlying area – it is a Port Hills hill suburb sandwiched between two existing RH hill suburbs (Westmorland to the east and Quarry Hill to the west). RH/RMD (Redmund Spur Precinct) zoning is

consistent with this setting and context.

- 11) LLR zoning of Redmund Spur is inconsistent with the purpose and intent of LLR zoning as specified in the national planning standards:

LLRZ

Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.

The current development with average lot sizes of around 900m<sup>2</sup> is not low density. There are few physical limitations or constraints to development of RHZ areas on the balance of the site.

Significant parts of Redmund Spur are well suited to more intensive development, as reflected in the current MDO rules which anticipate higher density development.

- 12) MDR zoning of Redmund Spur is consistent with the Intensification objectives and policies that the Enabling Act required to be included in the District Plan in particular

Objective 1

(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:

Objective 2

(b) a relevant residential zone provides for a variety of housing types and sizes that respond to—

(i) housing needs and demand; and

(ii) the neighbourhood's planned urban built character, including 3-storey buildings.

(2)

A territorial authority must include the following policies in its district plan:

Policy 1

(a) enable a variety of housing types with a mix of densities within the zone, including 3-storey attached and detached dwellings, and low-rise apartments:

Policy 2

(b) apply the MDRS across all relevant residential zones in the district plan except in circumstances where a qualifying matter is relevant (including matters of significance such as historic heritage and the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi

tapu, and other taonga):

- 13) Amended Rule 5.6.1.1 P21 will retain the status quo with respect to the approved zoning of the proposed Redmund Spur neighbourhood centre. The next development stage (Stage 6) will include the neighbourhood centre, which is currently being designed.

### **Relief Sought – Tree Canopy Cover**

The submitter supports the exclusion of Redmund Spur from the Operative Christchurch District Plan and PC14 definitions of greenfield and brownfield areas, which by definition exclude Redmund Spur and are referenced in 6.10A.2.1.1 Policy – Contribution to tree canopy cover and 6.10A.4.1.1 Permitted activities P2.

In all other respects, the Submitter opposes the tree canopy cover provisions in their entirety.

If the tree canopy provisions are retained in the PC14 decision, an element of an alternative, more workable approach should include the option of providing tree canopy off site, but within the wider subdivision area or elsewhere e.g. for a hill subdivision, protection of existing trees in gully areas which are not appropriate to develop, are suited to tree growth (wetter conditions) and where tree growth helps stabilize soils and reduce risk of erosion.

### **Reasons for Submission – Tree Canopy Cover**

1. The relief sought is consistent with and gives effect to the Resource Management Act 1991 (RMA), and in terms of s32 of the RMA is the most appropriate way for achieving the purpose of the objectives of the proposal (including any consequential amendments to the same to give effect to the purpose and intent of this submission).
2. The Submitter supports existing urban areas, including Redmund Spur in its entirety, as being excluded from the tree canopy requirements with respect to greenfield and brownfield development road reserve areas.
3. In all other respects the PC14 tree canopy cover provisions are impractical and unworkable and will adversely affect the feasibility and take up of housing development opportunities including intensification enabled by PPC14 and the current District Plan. The outcomes will be contrary to the intent of the RMA including the RM Enabling Housing Amendment Act in enabling increased housing choice and affordability which contributes to a well functioning urban environment.

A handwritten signature in black ink, appearing to read "T. D. A.", enclosed in a thin rectangular border.

.....  
(Signature of applicant or person authorized to sign on behalf of the applicant)

Date: May 12, 2023

## ATTACHMENT 1: BACKGROUND AND CONTEXT

### Background – Submitter and Zoning

The Submitter, Red Spur Ltd (Red Spur), owns land at Redmund Spur, Halswell. An associated company has also developed Quarry Hill which is a neighbouring Upper Kennedys Bush subdivision, comprising 100 sections, with lot sizes in the 850m<sup>2</sup> to 2400m<sup>2</sup> size range, approved under the previous City Plan LHA zone provisions (minimum net site area 850m<sup>2</sup>, minimum average 1500m<sup>2</sup>).

The two subdivisions are separated by a band of Rural H zoned land also owned by associated interests and part of a larger balance Rural H zoned area (totaling appx 250 ha). The Halswell Quarry Park is on the west boundary of the properties.

Red Spur is now developing Redmund Spur - see <https://www.redmundspur.co.nz/>. Stages 1-6 (116 lots) are now complete or consented with lot sizes in the appx 450m<sup>2</sup> to 5000m<sup>2</sup> range. Later stages are anticipated, including some lots in the 280m<sup>2</sup> – 450m<sup>2</sup> size range.

Both Upper Kennedys Bush and Redmund Spur are zoned Residential Hills in the Christchurch District Plan.



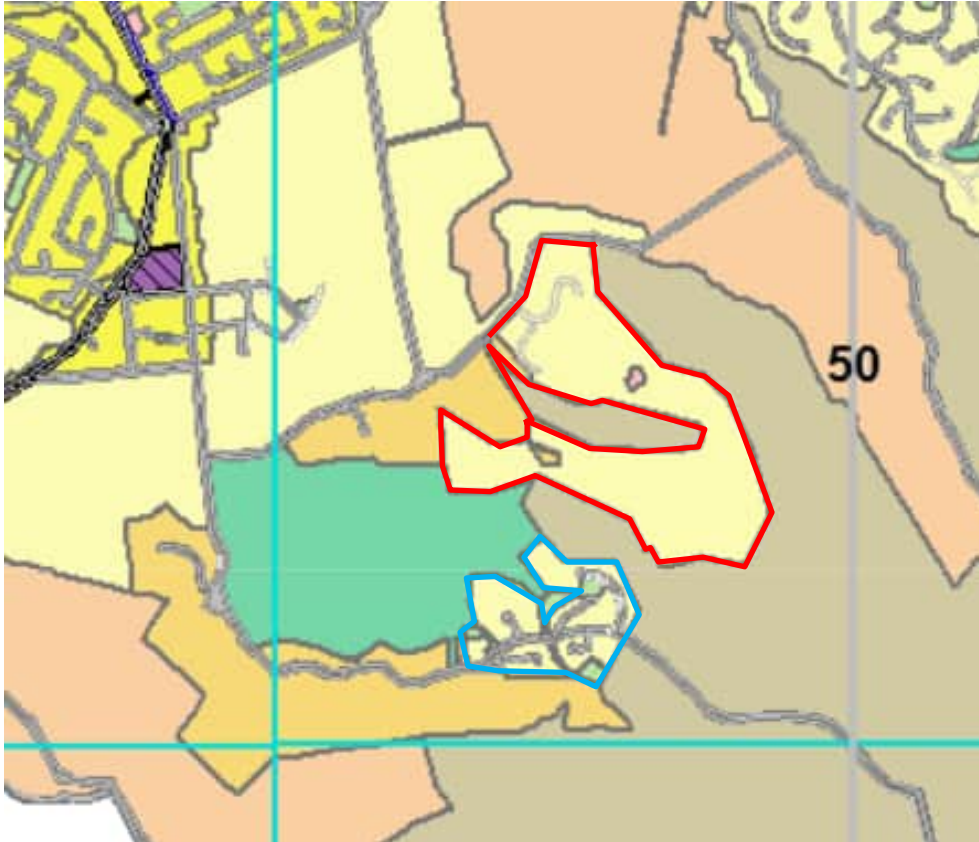


Figure 1: Zoning Map – Christchurch District Plan

Redmund Spur outlined in red; Upper Kennedys Bush outlined in blue.

Light yellow – Residential Hills; Mustard yellow – Residential Large Lot

Under the current provisions Redmund Spur is subject to a 'Mixed Density Overlay' (MDO) which specifies

- The maximum number of allotments shall be 400.
- A minimum of 30% of sites shall have a minimum net site area of 1500m<sup>2</sup>

There is no minimum lot size.

The MDO was introduced in the Christchurch District Plan. The anticipated section mix based on the MDO is

- 15% 200-650m<sup>2</sup>
- 55% 650-1500m<sup>2</sup>
- 30% 1500m<sup>2</sup>+

The MDO takes its 'cue' from the existing Cashmere Hills suburb which is a very attractive high

amenity suburb. It provides for a wide range of section sizes and housing types, ranging from townhouses and apartments to substantial homes on larger sites and an overall 'leafy' feel. A local neighbourhood centre is zoned at Redmund Spur positioned in a similar position at a local roads intersection with north facing views to plains and Alps to the café/bar cluster, gift shop and florist at the Dyers Pass/Hackthorne Road intersection on Cashmere Hill.

There is only one other equivalent MDO in the Residential Hills, at 86 Bridle Path Road, Heathcote. This provides for up to 9 lots. Development is underway there. Consent has been obtained for a 10 lot subdivision.

Redmund Spur is particularly suited to a some medium density development because it includes substantial areas of flatter north facing land suitable for higher density development. This provides added housing choice, including smaller more affordable housing, in accordance with the intent of PPC14, and is currently one of only two locations on the Residential Hills where higher density development can occur. There is no minimum lot size under the residential density standard (14.7.2.1 iii) and no minimum lot size applies where an allotment is to be created around an existing building (that has been constructed to the extent that its exterior is fully closed in), or a proposed building where the subdivision consent is to be issued at the same time as, or after, the building consent for that building is issued (8.6.2). The operative site coverage rules for Redmund Spur anticipate some higher density development, with a maximum site coverage of 45% applying to sites under 450m<sup>2</sup>.

The above operative rules have been utilized to enable some smaller lot development at Redmund Spur (appx 11 approved to date).

### **PPC 14 – Zoning**

PPC14 essentially proposes 'upzoning' all of the existing residential zones in the Christchurch District Plan except for the Large Lot Residential and Small Settlement Zones and where qualifying matters apply. The proposed Residential Medium Density Zone enables 3 houses per site, up to 3 storeys high, subject to development standards as specified in the Resource Management Enabling Housing Amendment Act 2021 (the Enabling Act), but with an amendment to the Height in Relation to Boundary rule (for which a proposed qualifying matter applies).

One Qualifying Matter applies to areas with low public transport accessibility where the

Residential Suburban Zone, Residential Banks Peninsula and Residential Hills Zone (part) and their current standards in the District Plan continue to apply. This limits the application of the Medium Density Residential Zone (and the MDRS standards) to residential areas with the following spatial characteristics:

- Residential areas within 800m walk from five High Frequency (Core) Routes
- Residential areas within 800m walk from additional bus routes with significant potential to connect employment centres together
- Residential areas more than 200m from High Density Residential Zones and the application of Policy 3 in relation to centres, snapping to the nearest city block
- Areas zoned Residential Suburban Density Transition Zone, Residential New Neighbourhoods (RNNZ) and Residential Medium Density<sup>1</sup>

However, based on the PPC14 planning maps, parts of the operative RNNZ have been rezoned Future Urban Zone. The MDRS does not apply to the FUZ which retains the operative RNNZ standards.

The justification for the Low Public Transport Accessibility Qualifying Matter (LPTA QM) is summarized as below:

This qualifying matter will provide for a level of intensification within the qualifying matter area consistent with the level of existing and likely future accessibility to employment, education and community services in these areas and promote an integrated and more efficient and effective approach to the provision of public transport and three waters network infrastructure focussed on areas most suited to enable intensification close to centres and areas with relatively strong demand. It will support well-functioning urban environments reductions in greenhouse gas emissions and support resilience to climate change effects without significantly impacting on housing affordability and competitive land and development markets.<sup>2</sup>

It aligns the location of medium density development with existing and committed structural investments and cross organisational planning for the provision of public transport in Greater Christchurch, including as set out in the Greater Christchurch Public Transport Combined Business Case 2020 (the PT Combined Business Case).<sup>3</sup>

---

<sup>1</sup> Qualifying Matters Section 32 Assessment paragraph 6.32.1

<sup>2</sup> Qualifying Matters Section 32 Assessment paragraph 6.32.49

<sup>3</sup> Qualifying Matters Section 32 Assessment paragraph 6.32.11

The PPC14 proposed zoning of Redmund Spur and surrounding areas is as below:

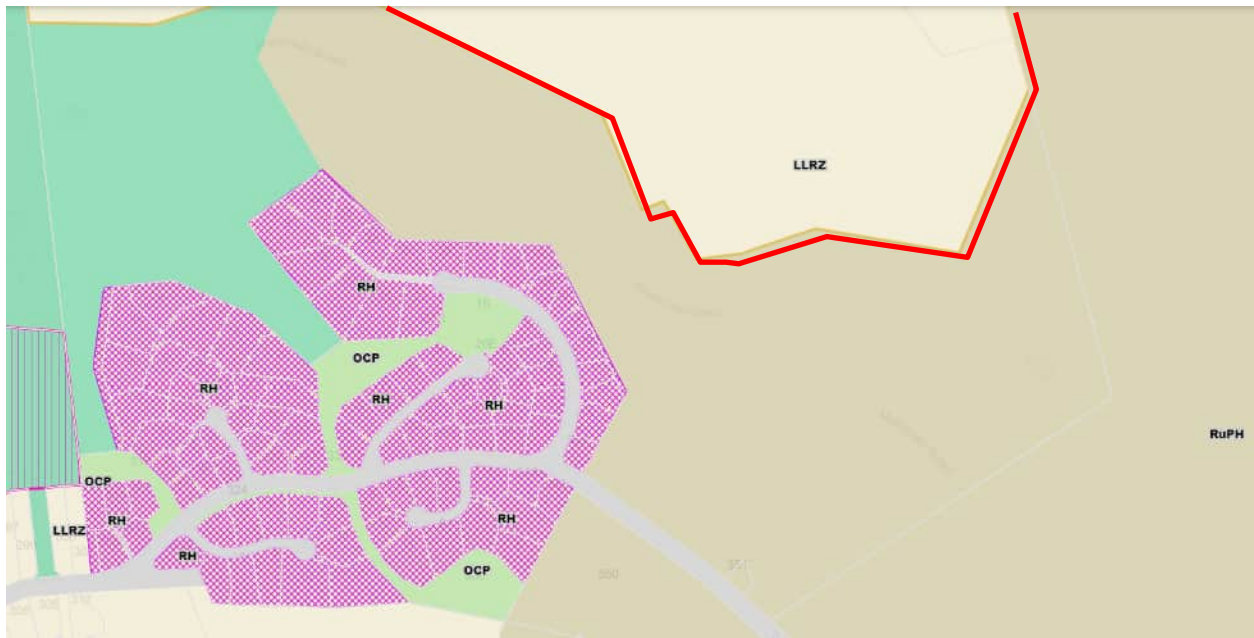
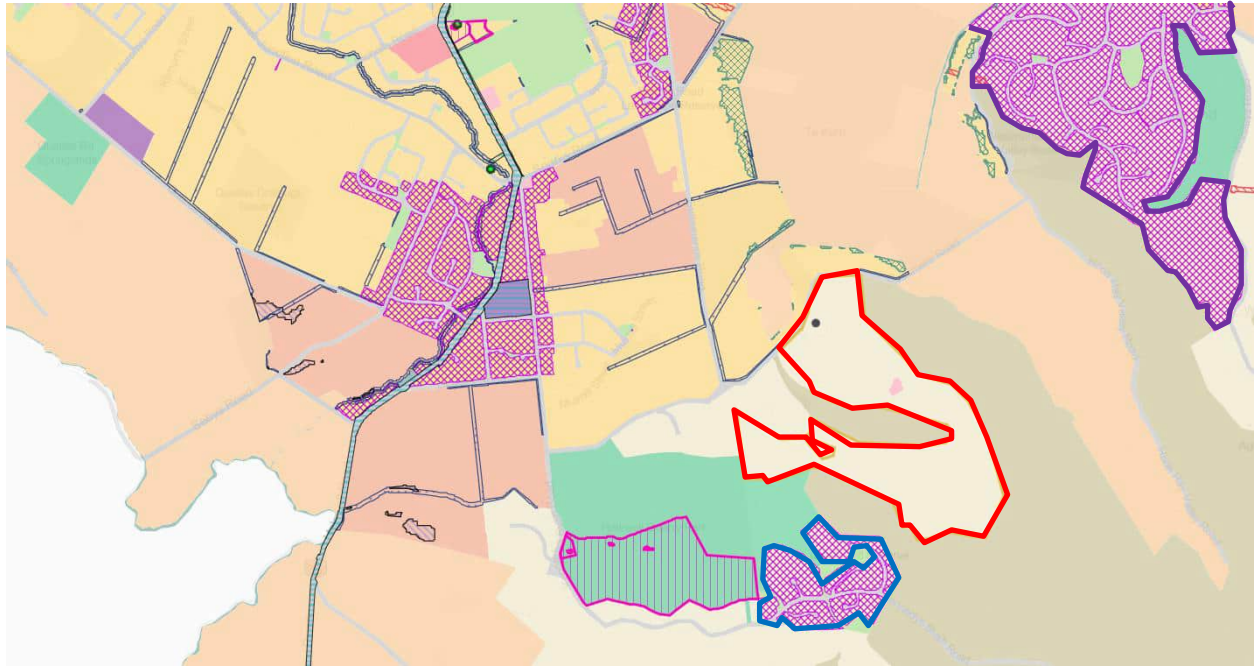


Figure 1: PPC14 planning maps – Redmund Spur and vicinity (Redmund Spur outlined in red, Quarry Hill outline in blue, Westmorland outlined in purple) including close up of Quarry Hill and southern Redmund Spur

- LLRZ** Large Lot Residential Zone
- RH** Residential Hills Zone

<b>RNN</b>	Residential New Neighbourhood Zone
<b>FUZ</b>	Future Urban Zone
<b>RuUF</b>	Rural Urban Fringe Zone
<b>NCZ</b>	Neighbourhood Centre Zone
	Low Public Transport Accessibility Area

PPC14 proposes to 'downzone' Redmund Spur to Large Lot Residential, but retain the existing MDO development standards. The 'downzoning' of Redmund Spur to LLR is opposed.

PPC14 retains the Redmund Spur Commercial Local Centre, but rezones it Neighbourhood Centre to align with the National Planning Standards. Rule 5.6.1.1 P21 as below is retained with some amendments.

With regard to neighbouring land, the land on the north side of Cashmere Road opposite Redmund Spur is zoned MDR, and land within the current RNNZ at south Halswell is zoned FUZ. It is understood that parts of the RNNZ fully or partially developed are zoned MDR. Upper Kennedys Bush and Westmorland are LPTA areas, and retain the current Residential Hills zoning. Further east, Cashmere Estates is zoned FUZ, and lower Cashmere is zoned MDR but middle and upper areas are LPTA areas and retain the current RH zoning.

### **Tree Canopy Cover**

PPC 14 requires a tree canopy cover financial contribution to be paid at the time of subdivision or building consent where a proposed development does not include:

- 20% tree canopy cover within a development site; and
- For residential greenfield and brownfields subdivision, in addition, an additional 15% of the future road area to be vested in Council.

The additional 15% requirement for greenfield and brownfields residential subdivision does not apply to Redmund Spur and it is not a greenfield or brownfield area, as defined in the Operative Christchurch District Plan and PC14.

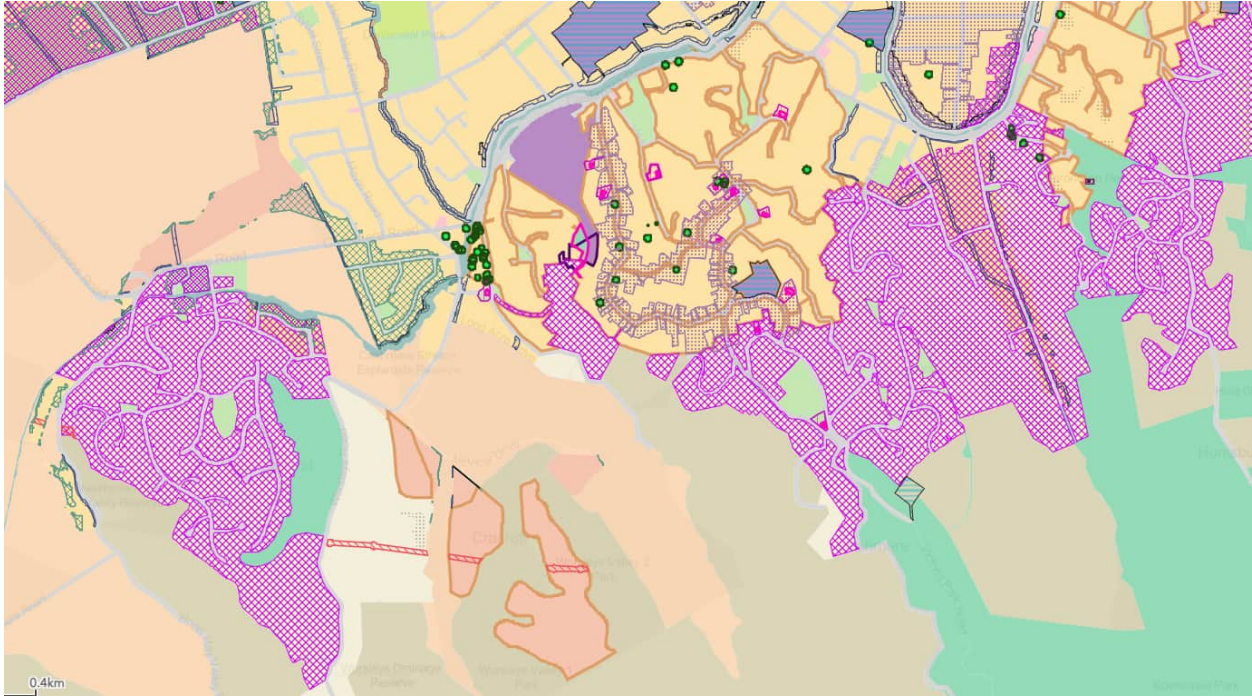


Figure 2: PPC14 planning map – Westmorland, Cashmere Estates, Cashmere and Bowenvale

# Our proposed Housing and Business Choice Plan Change (14)

## Submitter Details

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

**First name:** Daniela **Last name:** Bagozzi

**Organisation:** Latimer Community Housing

Trust

**On behalf of:**

**Preferred method of contact** Email

**Postal address:**

**Suburb:** Lincoln

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8011

**Email:** d.bagozzi@ext.canterbury.ac.nz

**Daytime Phone:** 033810829

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

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

Note to person making submission:

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

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

Additional requirements for hearing:

## Attached Documents

File
Daniela Bagozzi - Email 1 of 2

File

Daniela Bagozzi - Email 2 of 2



**Jackson, Andrew**

---

**From:** Daniela Bagozzi <d.bagozzi@ext.canterbury.ac.nz>  
**Sent:** Monday, 15 May 2023 10:02 am  
**To:** Engagement  
**Subject:** Re: Feedback on Our proposed Housing and Business Choice Plan Change (PC14) / 531

Thank you so much!

I had copied & pasted it into my email, but I'll copy it and paste it here below:

""Submitter details:

Daniela Bagozzi  
on behalf of Latimer Community Housing Trust  
Suburb: Linwood  
City: Christchurch, NZ  
Postcode: 8011  
Email: [d.bagozzi@ext.canterbury.ac.nz](mailto:d.bagozzi@ext.canterbury.ac.nz)  
Daytime phone: 03 3810829

I hereby declare that I will not derive any gain nor trade advantage from any of the matters dealt with in this submission.

The Latimer Community Housing Trust would like to present our submission at a hearing.

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

- Financial contributions
- Inclusionary Zoning

2) Our submission is:

The Latimer Community Housing Trust operates in the Inner City East/Linwood area  
The Trust's purpose is to house the most financially stressed renters - single people, couples, single parent families and the working poor, to secure affordable housing and ensure local residents displaced as a consequence of housing intensification can be rehoused in this neighbourhood.

We support the submission of Te Whare Roimata Trust and its recommendations.

3) What we want is to see is an inclusionary Housing Plan which lists within the District Plan along the lines of the Queenstown Lakes Council, which requires developers of new residential housing in the area to make a financial contribution to a fund to be used to provide affordable housing. Such a fund is similar to the contribution developers pay towards protecting our environment."

Regards,

D. Bagozzi

On 15/05/2023, at 9:18 AM, Engagement <engagement@ccc.govt.nz> wrote:

Kia ora Daniela,

Thanks for your email and we appreciate your feedback.

The closing date was 12 May, but please send your submission through email and I can submit for you.

Ngā mihi,

## Aviva Cui

### Engagement Assistant

Communications and Engagement

Pronouns: she/her

<image001.jpg>

<image002.png> 03 941-6844 | 027 367 1828

<image003.png> [Aviva.cui@ccc.govt.nz](mailto:Aviva.cui@ccc.govt.nz)

<image004.png> Te Hononga Civic Offices, 53 Hereford Street, Christchurch

<image005.png> PO Box 73016, Christchurch 8154

<image006.png> [ccc.govt.nz](http://ccc.govt.nz)

<image007.png>

<image008.jpg>

---

**From:** Daniela Bagozzi <[d.bagozzi@ext.canterbury.ac.nz](mailto:d.bagozzi@ext.canterbury.ac.nz)>

**Sent:** Sunday, 14 May 2023 5:41 pm

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

**Subject:** Feedback on Our proposed Housing and Business Choice Plan Change (PC14) / 531

We appeared to have had a problem with filing our submission online, and the email addressed we used was apparently either not working or incorrect.

Can we still add our submission by email? (Closing date postponed to 18th May - is that right?)

I'm copying and pasting it down below.

Thank you for your time,

Daniela Bagozzi, on behalf of Latimer Community Housing Trust

"Submitter details:

on behalf of Latimer Community Housing Trust

Suburb: Linwood

City: Christchurch, NZ

Postcode: 8011

Email: [d.bagozzi@ext.canterbury.ac.nz](mailto:d.bagozzi@ext.canterbury.ac.nz)

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Regards,

D. Bagozzi

This email may be confidential and subject to legal privilege, it may not reflect the views of the University of Canterbury, and it is not guaranteed to be virus free. If you are not an intended recipient, please notify the sender immediately and erase all copies of the message and any attachments.

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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.

**Jackson, Andrew**

---

**From:** Daniela Bagozzi <d.bagozzi@ext.canterbury.ac.nz>  
**Sent:** Sunday, 14 May 2023 5:41 pm  
**To:** Engagement  
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Regards,  
D. Bagozzi

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## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Fiona **Last name:** Aston

**Organisation:** Miles Premises Ltd

**On behalf of:**

**Preferred method of contact** Email

**Postal address:** PO Box 1435

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:** 8140

**Email:** fiona@astonconsultants.co.nz

**Daytime Phone:** 0275 332213

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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.

Additional requirements for hearing:

### Attached Documents

File

MILES PC14 submission



# Submission on Proposed Plan Change 14 - Housing and Business Choice

Miles Premises Ltd

Christchurch City Council

**RESOURCE MANAGEMENT ACT 1991****CHRISTCHURCH CITY COUNCIL****SUBMISSION ON PLAN CHANGE 14  
HOUSING AND BUSINESS CHOICE****Submitter Details**

Name: Miles Premises Ltd

Postal address: C/- Aston Consultants Ltd  
Resource Management and Planning  
PO Box 1435  
Christchurch 8140

Email address: fiona@astonconsultants.co.nz

Phone Number: 03 3322618

Mobile Number: 0275 332213

Contact Person Fiona Aston

**Specific Proposals to Which this Submission Applies:**

Proposed Plan Change 14 (PC14) in its entirety, including but not limited to zoning, qualifying matters, and activity and built form standards, in particular as they affect and other properties located between the current 50 and 57 dBA Ldn Christchurch International Airport (CIAL) Noise Contour.

**PPC 14 – Zoning & Qualifying Matters***Zoning*

PPC14 essentially proposes 'upzoning' all of the existing residential zones in the Christchurch District Plan except for the Large Lot Residential and Small Settlement Zones and where qualifying matters apply. The proposed Residential Medium Density Zone enables 3 houses per site, up to 3 storeys high, subject to development standards as specified in the Resource Management Enabling Housing Amendment Act 2021 (the Enabling Act), but with an amendment to the Height in Relation to Boundary rule (for which a proposed qualifying matter applies).



### *Airport Noise Qualifying Matter (QM)*

A Qualifying Matter (QM) applies to areas located with the current operative CIAL 50 dBA Ldn noise contour. Intensification of these areas is excluded on the basis that this could result in greater incidence of complaints about airport noise related operations due to the potential for more residents to live in these areas. Applying this QM based on the 50 rather than the 57 dBA Ldn airport noise contour is unnecessarily conservative and out of step with the relevant NZ noise standards (NZS 6802) and international best practice. It results in development restrictions which are not justified on reverse sensitivity grounds.

Other than for 'historical' existing urban zoning, the land between the 50 and 57 dBA Ldn noise contours remains zoned Rural Urban Fringe with a minimum lot size of 4 ha for subdivision and a dwelling; or is subject to a form of business zoning which is limited to activities considered not to be sensitive to airport noise. This includes land on the Memorial Avenue/Russley Road corner (400, 475 Memorial Avenue and 500, 520 and 540 Avonhead Road) which is zoned Industrial Park Zone (Memorial Avenue). The land between the current 50-57 dBA Ldn airport noise contours is highly fragmented with existing lots generally 4 ha or smaller (due to historic planning regimes which enabled residential development on smaller lots where supported by, at that time, an economic horticultural use). The rural zoned land is now almost exclusively used for rural lifestyle purposes, and is exempted from the National Policy Statement – Highly Productive Land (NPS-HPL) under Clause 3.5.7 ai) because the nearest equivalent zone is the Rural Lifestyle Zone.

The inappropriateness of retaining the land between the current urban boundary and CIAL 50 and 57 dBA Ldn noise contour in rural zoning/airport noise restricted business zoning was recognized by the Commissioners for Change 1 to the Canterbury Regional Policy (CRPS). In their 2009 recommendation on submissions and further submissions, they identified Special Treatment Areas in their recommended Policy 12 below<sup>1</sup>:

#### Policy 12: Special Treatment Areas

Specific analysis and planning shall be undertaken to achieve the sustainable management of the natural

---

<sup>1</sup> The extent of the Special Treatment Areas was constrained by the nature of submissions on Change 1 to CRPS, but the principle of considering and reassessing the most appropriate and sustainable management areas currently constrained by airport noise related rules applies to the of the entire constrained NW Christchurch area

and physical resources of the following areas and to meet the stated expectations:

- (a) In Northwest Christchurch (STA1) to determine the medium and long-term sustainable future of the area affected by airport noise.

#### Methods

12.1 Christchurch City Council shall undertake specific planning investigations in relation to the three Special Treatment Areas by 2012 in conjunction with landowners within the areas and other stakeholders...

12.3 Christchurch City Council shall include appropriate zoning and/or other provisions with the district plan as a result of Method 12.1.

Subsequent planning processes were 'overtaken' by legislative changes and earthquake related processes which followed after the 2010/11 Canterbury earthquakes. The expedited Land Use Recovery Plan (LURP) processes replaced the Commissioners decision on Change 1 to the CRPS, and all appeals, including those in relation to the location of the airport noise constrained land, and the basis for the same, were extinguished. The CRPS has not been reviewed since, so that 'untested' approach to airport noise constraints (which is out of step with national and international standards) remains.

Enabling urban development between the 50 and 57 dBA Ldn contour is consistent with and gives effect to the National Policy Statement – Urban Development (NPS-UD). It will free up land for urban development in a location ideally suited to meeting the Council's obligations to provide at least sufficient development capacity to meet expected demand for land for housing and business and will contribute to a well functioning urban environment.

#### *Low Public Transport Accessibility*

A further QM relates to areas with low public transport accessibility where the Residential Suburban Zone, Residential Banks Peninsula and Residential Hills Zone and their current standards in the District Plan continue to apply. This limits the application of the Medium Density Residential Zone (and the MDRS standards) to residential areas with the following spatial characteristics:

- Residential areas within 800m walk from five High Frequency (Core) Routes
- Residential areas within 800m walk from additional bus routes with significant potential to connect employment centres together
- Residential areas more than 200m from High Density Residential Zones and the application of Policy 3 in relation to centres, snapping to the nearest city block

- Areas zoned Residential Suburban Density Transition Zone, Residential New Neighbourhoods (RNNZ) and Residential Medium Density<sup>2</sup>

Based on the PPC14 planning maps, parts of the operative NNZ have been rezoned Future Urban Zone. The MDRS do not apply to the FUZ which retains the operative NNZ standards. These require a minimum net residential density of 15 hh/ha, and minimum lot size 300m<sup>2</sup>, except that up to 20% can be between 180-299m<sup>2</sup> in area.

The justification for the Low Public Transport Accessibility Qualifying Matter (LPTA QM) is summarized as below:

This qualifying matter will provide for a level of intensification within the qualifying matter area consistent with the level of existing and likely future accessibility to employment, education and community services in these areas and promote an integrated and more efficient and effective approach to the provision of public transport and three waters network infrastructure focussed on areas most suited to enable intensification close to centres and areas with relatively strong demand. It will support well-functioning urban environments reductions in greenhouse gas emissions and support resilience to climate change effects without significantly impacting on housing affordability and competitive land and development markets.<sup>3</sup>

It aligns the location of medium density development with existing and committed structural investments and cross organisational planning for the provision of public transport in Greater Christchurch, including as set out in the Greater Christchurch Public Transport Combined Business Case 2020 (the PT Combined Business Case).<sup>4</sup>

Enabling urban including residential and/or non airport noise restricted business development of land within the 50-57 dBA Ldn airport noise contour will provide increased opportunity (additional local population and potential patronage) for improved PT between the central city and the CIAL, a major economic hub.

### **Relief Sought**

Rezone land between the 50 and 57 Ldn CIAL airport noise contour for urban development, with no restrictions relating to airport noise, including the land identified on the aerial photograph below

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<sup>2</sup> Qualifying Matters Section 32 Assessment paragraph 6.32.1

<sup>3</sup> Qualifying Matters Section 32 Assessment paragraph 6.32.49

<sup>4</sup> Qualifying Matters Section 32 Assessment paragraph 6.32.11

ie 400, 475 Memorial Avenue and 500, 520 and 540 Avonhead Road. Rezone/amend the current urban zoning of 400, 475 Memorial Avenue and 500, 520 and 540 Avonhead Road to allow the full range of business and related activities (industrial, office, accommodation, health, community, entertainment, recreation etc) and/or rezone in full or part Future Urban Zone or Medium Density Residential, in all cases with no restrictions in activity type or standards due to airport noise effects.

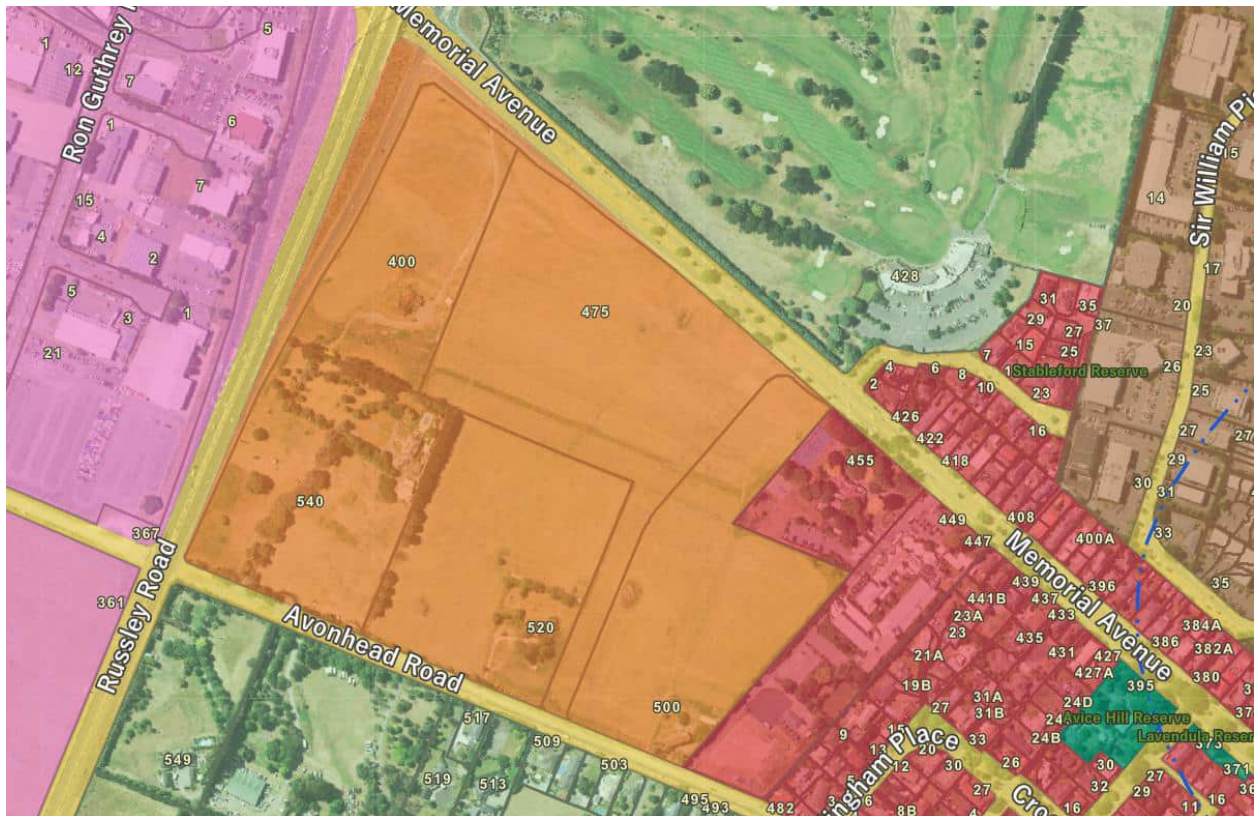


Figure 1: location of specific listed properties in Memorial Avenue and Avonhead Road. Source: Canterbury Maps. Red – existing urban zonings shown in red (residential), orange (Industrial Park – Memorial Avenue) and purple (Special Purpose Zone – Airport); Operative District Plan 50 dBA Ldn airport noise contour shown with blue hatched line.

Amend the Airport Noise Qualifying Matter to only apply to areas within the 57 dBA Ldn airport noise contour, such a contour to be based on a maximum 30 year assessment period having regard to matters such as future growth projections, predicted flight paths and expected flight paths.

Delete the LPTA QM, in particular as it applies to areas in north west Christchurch.

All consequential, further or alternative amendments to PPC14 to be consistent with and give effect to the intent of this submission and the interests of the Submitter, including but not limited to amendments to Chapter 6.1A Qualifying Matters, Chapter 8 Subdivision, Development and Earthworks, Chapter 14 Residential, Chapter 15 Commercial and Chapter 16 Industrial.

**Reasons for Relief Sought**

- 1) For the reasons outlined above under 'Zoning and Qualifying Matters'.
- 2) The relief sought is consistent with and gives effect to the Resource Management Act 1991 (RMA). In terms of s32, the objectives (including consequential amendments to be consistent and give effect to the intent of this submission) are the most appropriate way to give effect to the RMA.



.....  
 (Signature of applicant or person authorized to sign on behalf of the applicant)

Date: May 12, 2023

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Fiona **Last name:** Aston

**Organisation:** Troy Lange

**On behalf of:**

**Preferred method of contact**

**Postal address:** PO Box 1435

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:** 8140

**Daytime Phone:** 0275 332213

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

Additional requirements for hearing:

### Attached Documents

File

TLange PC14 submission



# Submission on Proposed Plan Change 14 - Housing and Business Choice

Troy Lange

Christchurch City Council

**RESOURCE MANAGEMENT ACT 1991****CHRISTCHURCH CITY COUNCIL****SUBMISSION ON PLAN CHANGE 14  
HOUSING AND BUSINESS CHOICE****Submitter Details**

Name: Troy Lange

Postal address: C/- Aston Consultants Ltd  
Resource Management and Planning  
PO Box 1435  
Christchurch 8140

Email address: fiona@astonconsultants.co.nz

Phone Number: 03 3322618

Mobile Number: 0275 332213

Contact Person Fiona Aston

**Specific Proposals to Which this Submission Applies:**

Proposed Plan Change 14 (PC14) in its entirety, including but not limited to zoning, qualifying matters, and activity and built form standards, in particular as they affect 120, 100, 88, 76, 68, 66, 60, 46, 44, 42, 40 and 38 Hawthornden Road and other properties located between the current 50 and 55 dBA Ldn Christchurch International Airport (CIAL) Noise Contour.

**PPC 14 – Zoning & Qualifying Matters***Zoning*

PPC14 essentially proposes ‘upzoning’ all of the existing residential zones in the Christchurch District Plan except for the Large Lot Residential and Small Settlement Zones and where qualifying matters apply. The proposed Residential Medium Density Zone enables 3 houses per site, up to 3 storeys high, subject to development standards as specified in the Resource Management Enabling Housing Amendment Act 2021 (the Enabling Act), but with an amendment to the Height in Relation to Boundary rule (for which a proposed qualifying matter applies).



### *Airport Noise Qualifying Matter (QM)*

A Qualifying Matter (QM) applies to areas located with the current operative CIAL 50 dBA Ldn noise contour. Intensification of these areas is excluded on the basis that this could result in greater incidence of complaints about airport noise related operations due to the potential for more residents to live in these areas. Applying this QM based on the 50 rather than the 55 dBA Ldn airport noise contour is unnecessarily conservative and out of step with the relevant NZ noise standards (NZS 6802) and international best practice which applies the 55 dBA Ldn noise contour. It results in development restrictions which are not justified on reverse sensitivity grounds.

The land between the 50 and 55 dBA Ldn noise contours remains zoned Rural Urban Fringe with a minimum lot size of 4 ha for subdivision and a dwelling. The land is highly fragmented with existing lots generally 4 ha or smaller (due to historic planning regimes which enabled residential development on smaller lots where supported by, at that time, an economic horticultural use). The land is now almost exclusively used for rural lifestyle purposes, and is exempted from the National Policy Statement – Highly Productive Land (NPS-HPL) under Clause 3.5.7 ai) because the nearest equivalent zone is the Rural Lifestyle Zone.

The inappropriateness of retaining the land between the current urban boundary and CIAL 50 dBA Ldn noise contour in rural zoning was recognized by the Commissioners for Change 1 to the Canterbury Regional Policy (CRPS). In their 2009 recommendation on submissions and further submissions, they identified Special Treatment Areas in their recommended Policy 12 below<sup>1</sup>:

#### Policy 12: Special Treatment Areas

Specific analysis and planning shall be undertaken to achieve the sustainable management of the natural and physical resources of the following areas and to meet the stated expectations:

- (a) In Northwest Christchurch (STA1) to determine the medium and long-term sustainable future of the area affected by airport noise.

#### Methods

12.1 Christchurch City Council shall undertake specific planning investigations in relation to the three Special Treatment Areas by 2012 in conjunction with landowners within the areas and other stakeholders...

---

<sup>1</sup> The extent of the Special Treatment Areas was constrained by the nature of submissions on Change 1 to CRPS, but the principle of considering and reassessing the most appropriate and sustainable management areas currently constrained by airport noise related rules applies to the of the entire constrained NW Christchurch area

12.3 Christchurch City Council shall include appropriate zoning and/or other provisions with the district plan as a result of Method 12.1.

Subsequent planning processes were 'overtaken' by legislative changes and earthquake related processes which followed after the 2010/11 Canterbury earthquakes. The expedited Land Use Recovery Plan (LURP) processes replaced the Commissioners decision on Change 1 to the CRPS, and all appeals, including those in relation to the location of the airport noise constrained land, and the basis for the same, were extinguished. The CRPS has not been reviewed since, so that 'untested' approach to airport noise constraints (which is out of step with national and international standards) remains.

Enabling urban development between the 50 and 55 dBA Ldn contour is consistent with and gives effect to the National Policy Statement – Urban Development (NPS-UD). It will free up land for urban development in a location ideally suited to meeting the Council's obligations to provide at least sufficient development capacity to meet expected demand for land for housing and business and will contribute to a well functioning urban environment.

#### *Low Public Transport Accessibility*

A further QM relates to areas with low public transport accessibility where the Residential Suburban Zone, Residential Banks Peninsula and Residential Hills Zone and their current standards in the District Plan continue to apply. This limits the application of the Medium Density Residential Zone (and the MDRS standards) to residential areas with the following spatial characteristics:

- Residential areas within 800m walk from five High Frequency (Core) Routes
- Residential areas within 800m walk from additional bus routes with significant potential to connect employment centres together
- Residential areas more than 200m from High Density Residential Zones and the application of Policy 3 in relation to centres, snapping to the nearest city block
- Areas zoned Residential Suburban Density Transition Zone, Residential New Neighbourhoods (RNNZ) and Residential Medium Density<sup>2</sup>

Based on the PPC14 planning maps, parts of the operative NNZ have been rezoned Future Urban Zone. The MDRS do not apply to the FUZ which retains the operative NNZ standards. These

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<sup>2</sup> Qualifying Matters Section 32 Assessment paragraph 6.32.1

require a minimum net residential density of 15 hh/ha, and minimum lot size 300m<sup>2</sup>, except that up to 20% can be between 180-299m<sup>2</sup> in area.

The justification for the Low Public Transport Accessibility Qualifying Matter (LPTA QM) is summarized as below:

This qualifying matter will provide for a level of intensification within the qualifying matter area consistent with the level of existing and likely future accessibility to employment, education and community services in these areas and promote an integrated and more efficient and effective approach to the provision of public transport and three waters network infrastructure focussed on areas most suited to enable intensification close to centres and areas with relatively strong demand. It will support well-functioning urban environments reductions in greenhouse gas emissions and support resilience to climate change effects without significantly impacting on housing affordability and competitive land and development markets.<sup>3</sup>

It aligns the location of medium density development with existing and committed structural investments and cross organisational planning for the provision of public transport in Greater Christchurch, including as set out in the Greater Christchurch Public Transport Combined Business Case 2020 (the PT Combined Business Case).<sup>4</sup>

Enabling urban including residential development of land within the 50-55 dBA Ldn airport noise contour will provide increased opportunity (additional local population and potential patronage) for improved PT between the central city and the CIAL, a major economic hub.

### **Relief Sought**

Rezone land between the 50 and 55 Ldn CIAL airport noise contour for urban development, with no restrictions relating to airport noise, including 120, 100, 88, 76, 68, 66, 60, 46, 44, 42, 40 and 38 Hawthornden Road as identified on the aerial photograph (Figure 1) below. Rezone 120, 100, 88, 76, 68, 66, 60, 46, 44, 42, 40 and 38 Hawthornden Road Future Urban Zone or Medium Density Residential.

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<sup>3</sup> Qualifying Matters Section 32 Assessment paragraph 6.32.49

<sup>4</sup> Qualifying Matters Section 32 Assessment paragraph 6.32.11

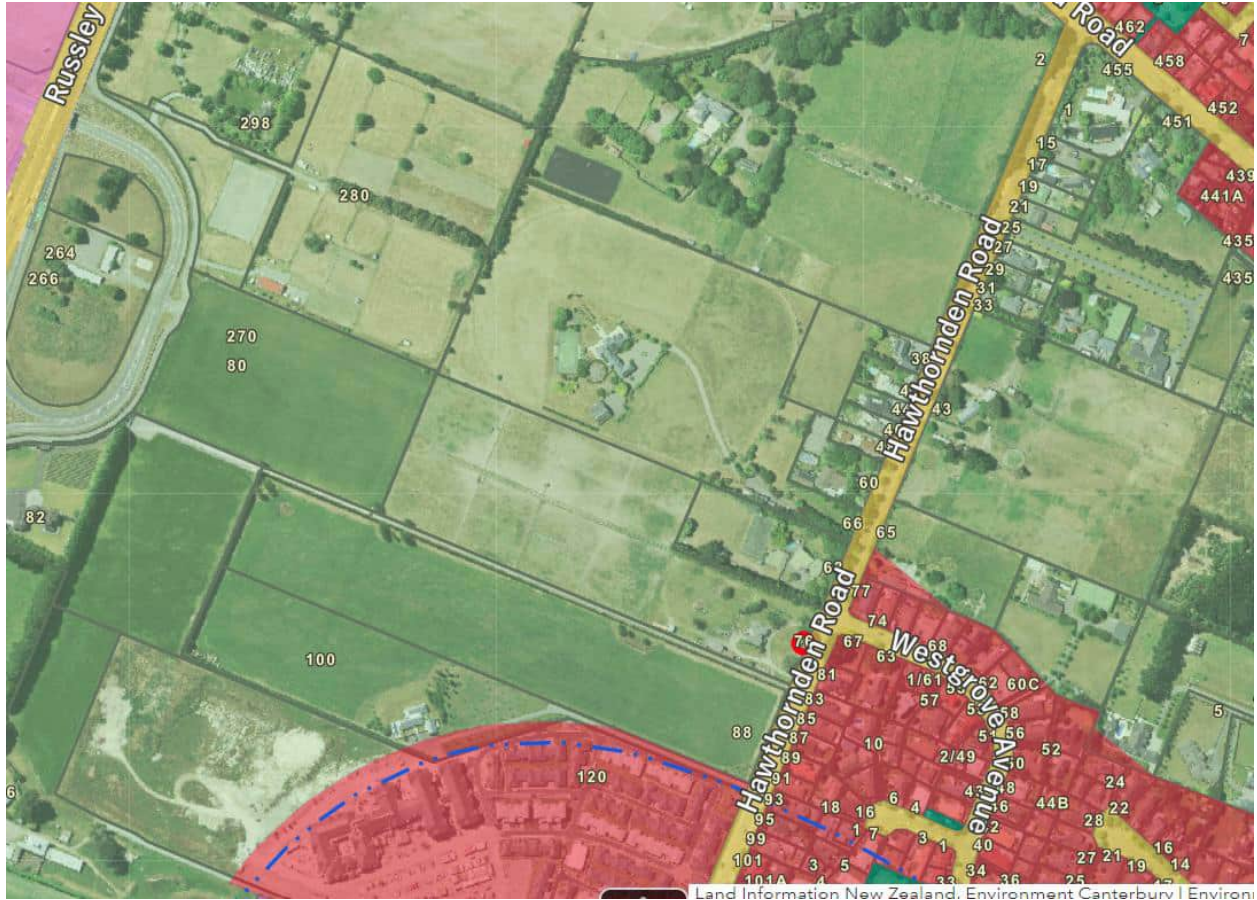


Figure 1: Land at Hawthornden Road proposed to be rezoned (and in addition other land located between the 50-55 dBA Ldn noise contour)

Amend the Airport Noise Qualifying Matter to only apply to areas within the 55 dBA Ldn CIAL airport noise contour, such a contour to be based on a maximum 30 year assessment period having regard to matters such as future growth projections, predicted flight paths and expected fleet mix. The contour should be based on an assessment of the annual average noise, as opposed to the current contour which is based on the 3 busiest months of commercial aircraft movements.

Delete the LPTA QM, in particular as it applies to areas in north west Christchurch.

All consequential, further or alternative amendments to PPC14 to be consistent with and give effect to the intent of this submission and the interests of the Submitter, including but not limited to amendments to Chapter 6.1A Qualifying Matters, Chapter 8 Subdivision, Development and

Earthworks, Chapter 14 Residential, Chapter 15 Commercial and Chapter 16 Industrial, and addition of Outline Development Plans for the areas sought to be rezoned by this submission.

**Reasons for Relief Sought**

- 1) For the reasons outlined above under 'Zoning and Qualifying Matters'.
- 2) The relief sought is consistent with and gives effect to the Resource Management Act 1991 (RMA). In terms of s32, the objectives (including consequential amendments to be consistent and give effect to the intent of this submission) are the most appropriate way to give effect to the RMA.



.....  
(Signature of applicant or person authorized to sign on behalf of the applicant)

Date: May 12, 2023

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Peter **Last name:** Dyhrberg

**On behalf of:**

**Preferred method of contact**

**Postal address:** 118 Chester Street

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:** 8011

**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
Peter

**Robson, Gina**

---

**From:** Peter Dyhrberg <peter.dyhrberg@lawbridge.co.nz>  
**Sent:** Saturday, 13 May 2023 3:07 pm  
**To:** Engagement  
**Subject:** Proposed Plan Changes 13 and 14.

To whom it may concern,

1. I confirm this email is from Peter Dyhrberg a resident at 118 Chester Street Christchurch.
2. I endeavoured to transmit a submission on the above-noted proposed Plan Changes last night, well before the 11:59 pm deadline but was unable to effect transmission for lack of a "passcode" or password despite entering my email address and then invoking the "Resume" your submission option and requesting a passcode be sent to me.
3. In the circumstances I therefore request acceptance of my brief submission via this email, now transmitted. (Another point I could not help noticing about the CCC web site for this subject was that ,in a number of locations where there was relevant information, the indication was still being given that the deadline was on the 3rd May 2023.)
4. SUBMISSION.
  - (a) I support the proposed Residential Heritage Areas. In particular I support the proposed Chester Street / Dawson Street Residential Heritage Area including the proposed Interface rules for the adjacent sites which share a boundary with that proposed Residential Heritage Area.
  - (b) I oppose the proposed extent of the High Density Residential Area to the areas of the city north of Armagh Street and between Fitzgerald Avenue to the East and Madras Street to the West. I submit that area should be zoned as a Medium Density Residential Area with building heights limited to the same heights as are proposed for the other such MDR areas (understood to be 14 metres), preferably with a requirement for a greater

setback from any shared boundary with sites in the Residential Heritage Area than is proposed for setbacks from internal boundaries, generally, for the MDR zone(s).

Yours, Peter Dyhrberg.



## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Helen **Last name:** Broughton

**On behalf of:**

**Preferred method of contact** Email

**Postal address:** 25 Rata Street

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:** 8041

**Email:** helen@broughton.co.nz

**Daytime Phone:** 0276404935

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

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

### Attached Documents

File

Helen

**Robson, Gina**

---

**From:** Helen Broughton <helen@broughton.co.nz>  
**Sent:** Friday, 12 May 2023 11:25 pm  
**To:** Engagement; Helen Broughton  
**Subject:** Re Submission On Plan Change 14

helen@broughton.co.nz appears similar to someone who previously sent you email, but may not be that person. [Learn why this could be a risk](#)

**My name is Helen Broughton of 25 Rata Street. Christchurch.** I am currently Chair of the Waipuna-Halswell, Hornby, Riccarton Community Board, and was a City Councillor from 2001- 2013..I am a RMA Commissioner. As a Councillor for 12 years, I was on all the planning committees, including the committee that handled appeals to the Environment Court. I was involved as Deputy Chair with a range of issues before the Independent Hearings Panel in 2015.

**I wish to be heard in support of my submission on Plan Change 14  
 I could not gain an advantage in trade competition.  
 My phone number is 0276404935.**

The Waipuna Halswell, Hornby Riccarton Community Board has made a detailed submission, and the following is a personal submission, which relates to the area where I live.

It is disappointing to go through a process which residents went through in 2015. The area represented by the Riccarton Bush/Kilmarnock Residents' Association was successful in keeping the area residential suburban and residential suburban transitional density.

This is a far more difficult process in terms of the degree of change and the demands from the central government under the National Policy Statement Urban Development 2020 and the Resource Management {Enabling Housing Supply and Other Matters} Amendment Act 2021.

It is unprecedented for central government to be so directive and particularly concerning that Christchurch was included as a Tier One City, when there was no land scarcity - supposedly the basis for determining which cities were to be Tier One.

I did phone the public servant responsible for progressing this legislation through the House at the time and asked why Christchurch was included. I was advised they believed the largest city in the South Island needed to be included.

However there was no land scarcity that was the criteria at the time. Mayor Lianne Dalziel in a long letter to the Minister of the Environment in October 2019 clearly establishes Christchurch's position.. I was on Council after the earthquakes of 2010 and 2011 and involved in rezoning large areas for residential. I understand from Council staff there is no land scarcity and in my opinion the detailed population projections need to be carefully examined.

**I will address the concerns in my immediate area. I will also send through separately a technical framework.**

**a I support Riccarton House and Bush being a qualifying matter, but consider a greater area needs to be included** for the following reasons:.

1 The WSP report commissioned by the Council mapped out a larger area. The south side of Rata street between Rata and Rimu Street was included as was Kahu Road opposite the entrance to Riccarton House. It was a council planning decision to make this area medium density with a height limit of two storeys.

This is a compromise, but I advocate strongly that this area remain suburban density. There is no clear reason to set aside the WSP mapping.

2 Recognition needs to be given to the **Kauri Cluster which could be included within the qualifying matter of Riccarton House and Bush.** In 2007/2008 the area was turned into a precinct by narrowing of carriageway, grass berms widened, street thresholds introduced or upgraded, native trees planted in accordance with the street names- Rata trees for Rata Street, Rimu trees for Rimu street etc.

3 Medium density will mean that there will only be a 1.5 metre separation between the fenceline and a house - taking away the current front gardens and the likely removal of roadside reserve trees as the developer has the ability to determine where a driveway is placed. If roadside reserve trees need to come down, Council cannot stop their removal but can insist on replacement trees- usually young saplings.

**4 Riccarton House and Bush/ Putaringamotu is a unique NZ heritage site** that we have probably taken for granted. Riccarton Bush is of national significance and Riccarton House and Cottage are defined as Highly Significant..Maori were in the area before the arrival of the Deans family.The appropriate surrounding environment for such a significant heritage site is suburban density.. WSP have provided drawings of medium density and high density zoning which demonstrate how the environs and this significant heritage site could be undermined. The significance of this site will only increase in future years and it is imperative Council does not impose higher buildings around this site.

5 There is a larger area around Riccarton House and Bush that the Riccarton Bush /Kilmarnock Residents' Association requests retain suburban density. I fully support this submission

**Riccarton - The Foundation Borough For Christchurch** - Riccarton was the foundation borough for Christchurch and has a number of significant heritage items which are outlined in the Waipuna- Halswell, Hornby, Riccarton Community Board's submission. There is also the Matai Street cycleway which requires protection from the proposed intensification and eleven notable trees. Christchurch Boys High School commenced in 1881 and the residential properties opposite on Straven Road should retain current zoning. Should this wide area not retain current densities? High density development is completely inappropriate and I have reservations regarding medium density for this area.

I also question the walkable distance of Matai Street and further technical evidence will be provided..

**Airport Noise Controls;** I support but question if they should go further. I am awaiting the updated report. The contour places the northern side of Rata Street within the noise contours, the southern side outside the noise contours.

**Commercial ;** i oppose changing the maximum height of a commercial building from 20 to 22 metres for a current low level commercial building adjoining a residential zone.

I would argue for a lower height level, but would need more technical evidence.

**Setback- 15.4.2,4** I support proposed setback but would advocate for more distance,. Should the commercial height alongside a proposed over level residential area be adjusted.?

I thank you for the opportunity to submit

Helen Broughton.

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Fiona **Last name:** Aston

**Organisation:** Jane Harrow

**On behalf of:**

**Preferred method of contact** Email

**Postal address:** PO Box 1435

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:** 8140

**Email:** fiona@astonconsultants.co.nz

**Daytime Phone:** 0275 332213

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

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

Note to person making submission:

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

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

Additional requirements for hearing:

### Attached Documents

File

2260 revised final JHarrow PC14 submission



# Submission on Proposed Plan Change 14 - Housing and Business Choice

Jane Harrow

Christchurch City Council

**RESOURCE MANAGEMENT ACT 1991****CHRISTCHURCH CITY COUNCIL****SUBMISSION ON PLAN CHANGE 14  
HOUSING AND BUSINESS CHOICE****Submitter Details**

Name: Jane Harrow

Postal address: C/- Aston Consultants Ltd  
Resource Management and Planning  
PO Box 1435  
Christchurch 8140

Email address: fiona@astonconsultants.co.nz

Phone Number: 03 3322618

Mobile Number: 0275 332213

Contact Person Fiona Aston

**Specific Proposals to Which this Submission Applies:**

Proposed Plan Change 14 (PC14) in its entirety, including but not limited to zoning, qualifying matters, and activity and built form standards, in particular as they affect 384, 388, 420, 422, 424, 426, 434 Sawyers Arms Road and 123 and 141 Gardiners Road and other properties located between the current 50 and 55 dBA Ldn Christchurch International Airport (CIAL) Noise Contour.

**PPC 14 – Zoning & Qualifying Matters***Zoning*

PPC14 essentially proposes ‘upzoning’ all of the existing residential zones in the Christchurch District Plan except for the Large Lot Residential and Small Settlement Zones and where qualifying matters apply. The proposed Residential Medium Density Zone enables 3 houses per site, up to 3 storeys high, subject to development standards as specified in the Resource Management Enabling Housing Amendment Act 2021 (the Enabling Act), but with an amendment to the Height in Relation to Boundary rule (for which a proposed qualifying matter applies).

### *Airport Noise Qualifying Matter (QM)*

A Qualifying Matter (QM) applies to areas located with the current operative CIAL 50 dBA Ldn noise contour. Intensification of these areas is excluded on the basis that this could result in greater incidence of complaints about airport noise related operations due to the potential for more residents to live in these areas. Applying this QM based on the 50 rather than the 55 dBA Ldn airport noise contour is unnecessarily conservative and out of step with the relevant NZ noise standards (NZS 6802) and international best practice which applies the 55 dBA Ldn noise contour. It results in development restrictions which are not justified on reverse sensitivity grounds.

The land between the 50 and 55 dBA Ldn noise contours remains zoned Rural Urban Fringe with a minimum lot size of 4 ha for subdivision and a dwelling. The land is highly fragmented with existing lots generally 4 ha or smaller (due to historic planning regimes which enabled residential development on smaller lots where supported by, at that time, an economic horticultural use). The land is now almost exclusively used for rural lifestyle purposes, and is exempted from the National Policy Statement – Highly Productive Land (NPS-HPL) under Clause 3.5.7 ai) because the nearest equivalent zone is the Rural Lifestyle Zone.

The inappropriateness of retaining the land between the current urban boundary and CIAL 50 dBA Ldn noise contour in rural zoning was recognized by the Commissioners for Change 1 to the Canterbury Regional Policy (CRPS). In their 2009 recommendation on submissions and further submissions, they identified Special Treatment Areas in their recommended Policy 12 below<sup>1</sup>:

#### Policy 12: Special Treatment Areas

Specific analysis and planning shall be undertaken to achieve the sustainable management of the natural and physical resources of the following areas and to meet the stated expectations:

- (a) In Northwest Christchurch (STA1) to determine the medium and long-term sustainable future of the area affected by airport noise.

#### Methods

12.1 Christchurch City Council shall undertake specific planning investigations in relation to the three Special Treatment Areas by 2012 in conjunction with landowners within the areas and other stakeholders...

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<sup>1</sup> The extent of the Special Treatment Areas was constrained by the nature of submissions on Change 1 to CRPS, but the principle of considering and reassessing the most appropriate and sustainable management areas currently constrained by airport noise related rules applies to the of the entire constrained NW Christchurch area

12.3 Christchurch City Council shall include appropriate zoning and/or other provisions with the district plan as a result of Method 12.1.

Subsequent planning processes were 'overtaken' by legislative changes and earthquake related processes which followed after the 2010/11 Canterbury earthquakes. The expedited Land Use Recovery Plan (LURP) processes replaced the Commissioners decision on Change 1 to the CRPS, and all appeals, including those in relation to the location of the airport noise constrained land, and the basis for the same, were extinguished. The CRPS has not been reviewed since, so that 'untested' approach to airport noise constraints (which is out of step with national and international standards) remains.

Enabling urban development between the 50 and 55 dBA Ldn contour is consistent with and gives effect to the National Policy Statement – Urban Development (NPS-UD). It will free up land for urban development in a location ideally suited to meeting the Council's obligations to provide at least sufficient development capacity to meet expected demand for land for housing and business and will contribute to a well functioning urban environment.

#### *Low Public Transport Accessibility*

A further QM relates to areas with low public transport accessibility where the Residential Suburban Zone, Residential Banks Peninsula and Residential Hills Zone and their current standards in the District Plan continue to apply. This limits the application of the Medium Density Residential Zone (and the MDRS standards) to residential areas with the following spatial characteristics:

- Residential areas within 800m walk from five High Frequency (Core) Routes
- Residential areas within 800m walk from additional bus routes with significant potential to connect employment centres together
- Residential areas more than 200m from High Density Residential Zones and the application of Policy 3 in relation to centres, snapping to the nearest city block
- Areas zoned Residential Suburban Density Transition Zone, Residential New Neighbourhoods (RNNZ) and Residential Medium Density<sup>2</sup>

Based on the PPC14 planning maps, parts of the operative NNZ have been rezoned Future Urban Zone. The MDRS do not apply to the FUZ which retains the operative NNZ standards. These

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<sup>2</sup> Qualifying Matters Section 32 Assessment paragraph 6.32.1



require a minimum net residential density of 15 hh/ha, and minimum lot size 300m<sup>2</sup>, except that up to 20% can be between 180-299m<sup>2</sup> in area.

The justification for the Low Public Transport Accessibility Qualifying Matter (LPTA QM) is summarized as below:

This qualifying matter will provide for a level of intensification within the qualifying matter area consistent with the level of existing and likely future accessibility to employment, education and community services in these areas and promote an integrated and more efficient and effective approach to the provision of public transport and three waters network infrastructure focussed on areas most suited to enable intensification close to centres and areas with relatively strong demand. It will support well-functioning urban environments reductions in greenhouse gas emissions and support resilience to climate change effects without significantly impacting on housing affordability and competitive land and development markets.<sup>3</sup>

It aligns the location of medium density development with existing and committed structural investments and cross organisational planning for the provision of public transport in Greater Christchurch, including as set out in the Greater Christchurch Public Transport Combined Business Case 2020 (the PT Combined Business Case).<sup>4</sup>

Enabling urban including residential development of land within the 50-55 dBA Ldn airport noise contour will provide increased opportunity (additional local population and potential patronage) for improved PT between the central city and the CIAL, a major economic hub.

### **Relief Sought**

Rezone land between the 50 and 55 Ldn CIAL airport noise contour for urban development, with no restrictions relating to airport noise, including 384, 388, 420, 422, 424, 426, 434 Sawyers Arms Road and 123 and 141 Gardiners Road as identified on the aerial photograph below. Rezone 384, 388, 420, 422, 424, 426, 434 Sawyers Arms Road and 123 and 141 Gardiners Road Future Urban Zone or Medium Density Residential.

Amend the Airport Noise Qualifying Matter to only apply to areas within the 55 dBA Ldn airport noise contour , such a contour to be based on a maximum 30 year assessment period having

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<sup>3</sup> Qualifying Matters Section 32 Assessment paragraph 6.32.49

<sup>4</sup> Qualifying Matters Section 32 Assessment paragraph 6.32.11

regard to matters such as future growth projections, predicted flight paths and expected fleet mix. The contour should be based on an assessment of the annual average noise, as opposed to the current contour which is based on the 3 busiest months of commercial aircraft movements.

Delete the LPTA QM, in particular as it applies to areas in north west Christchurch.

All consequential, further or alternative amendments to PPC14 to be consistent with and give effect to the intent of this submission and the interests of the Submitter, including but not limited to amendments to Chapter 6.1A Qualifying Matters, Chapter 8 Subdivision, Development and Earthworks, Chapter 14 Residential, Chapter 15 Commercial and Chapter 16 Industrial.

**Reasons for Relief Sought**

- 1) For the reasons outlined above under 'Zoning and Qualifying Matters'.
- 2) The relief sought is consistent with and gives effect to the Resource Management Act 1991 (RMA). In terms of s32, the objectives (including consequential amendments to be consistent and give effect to the intent of this submission) are the most appropriate way to give effect to the RMA.


 A handwritten signature in black ink, appearing to read 'T. D. A.', is enclosed in a thin black rectangular border.

.....  
 (Signature of applicant or person authorized to sign on behalf of the applicant)

Date: May 12, 2023

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** David **Last name:** Smithson

**On behalf of:**

**Preferred method of contact:** Postal

**Postal address:** 87 Normans Road

**Suburb:** Strowan

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8052

**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:

I do not wish to speak but if others make a similar submission, I will consider presenting a joint case with them at the hearing.

### Attached Documents

File

David Smith submission final

Have your say

Save time and do it online  
ccc.govt.nz/haveyoursay

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

RECEIVED  
12 MAY 2023  
*EW*

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\* David Smithson

Address\* 27 Normans Rd Postcode\* 8052

Email strowan@stra.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 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 *David Smithson* Date 9/5/23

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.)

In particular Infrastructure

|| Section 14.2.8.5  
" 14.2.8.6

### 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.)

- Traffic is a nightmare no parking spaces + inconsiderate people parking across + in our driveways
- Dangerous = for pedestrians + residents
- Stormwater + wastewater system are over loaded now conditions are unsafe - traffic problems endless.

### 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 strongly ask that Council CHANGE the (HRZ) which is proposed for the eastern blocks of Strowan from Normans Rd to Blinks Rd. to (MRZ) to halt the increase of current unsafe traffic issues + unhealthy wastewater problems.

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Susanne **Last name:** Elizabeth Hill

**On behalf of:**

**Preferred method of contact:** Postal

**Postal address:** 85 Normans Road

**Suburb:** Strowan

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8052

**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:

I do not wish to speak, but if others make a similar submission, I will consider presenting a joint case with them at the hearing

### Attached Documents

File

Susanne Elizabeth Hill final

Have your say

Save time and do it online

ccc.govt.nz/haveyoursay

# 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\* Suzanne Elizabeth Hill  
Address\* 85 Normans Road Struan Christchurch Postcode\* 8052  
Email sue@ghrooving.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 submission.

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

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

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

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

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

Joint submissions (Please tick this box if you agree)

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

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

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

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

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

Signature [Handwritten Signature] Date 2/5/23

# 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.)

### 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 strongly disagree to 4-5 storeys without a resource consent  
6 storeys is ~~not~~ unacceptable.

The parking is a problem at the moment with St. Andrews being over the road imagine what it would be like with 4-5 storeys let alone 6 storeys.

We would also lose our sun & privacy from our homes.  
We have just moved into this area and to read the infrastructure is not good doesn't make me very happy as a rate payer.

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

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

- ① I would like to see Townhouses put on these big sections when the older houses are passed their liveable stage. Mainly two townhouses at the most 3 if section is big enough.
- ② Look at carparking if this proposable is to go ahead.
- ③ Make the High-Density Residential Zone closer too centre of the City not out in the suburbs.



## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Graham **Last name:** William Hill

**On behalf of:**

**Preferred method of contact:** Postal

**Postal address:** 85 Normans Road

**Suburb:** Strowan

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8052

**Daytime Phone:** 8052

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

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

Note to person making submission:

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

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

Yes

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

### Attached Documents

File
Graham William Hill final

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

RECEIVED  
12 MAY 2023  
Chris

\* Required information

Name\* Graham William Hill

Address\* 85 Normans Rd Strouan Postcode\* 8052

Email graham@ghroofing.co.nz Phone no. 0274354214

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 G.W. Hill

Date 2.5.2023

Save time and do it online 890

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.)

### 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 Building of 4-5 storeys  
we have just purchased a new house on  
Normans Road, to see High Units going up  
would be devastating.

There is a big problem now with parking along  
Normans Road.

To have a 4-5 storey built beside us  
would impact on our Sun.

### 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.)

2

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Alan **Last name:** John David Gillies

**On behalf of:**

**Preferred method of contact:** Postal

**Postal address:** 95 Normans Road

**Suburb:** Strowan

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8052

**Daytime Phone:** 0274337504

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

I do NOT wish to speak but if others make a similar submission, I will consider presenting a joint case with them at the hearing.

### Attached Documents

File

Alan John David Gilliesfinal

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

RECEIVED

12 MAY 2023

am,

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\* ALAN JOHN DAVID GILLIES

Address\* 95 NORMANS ROAD Postcode\* 8052

Email john.gillies@xtra.co.nz Phone no. 0274337504

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

Organisation's name N/A

Your role N/A

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

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

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

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

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

Joint submissions (Please tick this box if you agree)

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

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

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

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

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

Signature [Handwritten Signature] Date 1/5/23

# 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.)

SECTION 14.2.8.5. POLICY - INFRASTRUCTURE SERVICING FOR DEVELOPMENTS

- a) ENSURE THAT DEVELOPMENTS ARE SERVICED WITH ALL REQUIRED INFRASTRUCTURE IN AN EFFECTIVE AND EFFICIENT MANNER

SECTION 14.2.8.6. POLICY - INTEGRATION AND CONNECTIVITY

- c) AVOID SIGNIFICANT ADVERSE EFFECTS AND REMEDY OR MITIGATE OTHER ADVERSE EFFECTS ON EXISTING BUSINESSES, RURAL ACTIVITIES OR INFRASTRUCTURE.

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.)

THE STROWAN AREA AND IN PARTICULAR, THE ST. ANDREWS COLLEGE REGION, ARE ALREADY STRESSED TO BREAKING POINT WITH REGARDS TO CAR PARKING, TRAFFIC CONGESTION, PROVISION OF ESSENTIAL SERVICES AS WELL AS STORMWATER AND WASTEWATER MANAGEMENT.

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.)

THE HIGH DENSITY RESIDENTIAL ZONE (HRZ) PROPOSED FOR THE STROWAN RESIDENTIAL BLOCKS FROM NORMANS TO BLIGHTS ROAD RUNS THE RISK OF CONVERTING THIS ECOLOGICALLY ATTRACTIVE REGION INTO AN OVERCROWDED GHETTO! I WOULD ADVISE STRONGLY THAT THE COUNCIL REVISES ITS PLAN TO A MEDIUM DENSITY RESIDENTIAL DEVELOPMENT (MRZ)

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Wayne **Last name:** Robertson

**On behalf of:**

**Preferred method of contact:** Email

**Postal address:** Unit 2, 14 Bishop Street

**Suburb:** St Albans

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8014

**Email:** robertsonsteel@yahoo.co.nz

**Daytime Phone:** 0211157371

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:** 92.1

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**

High residential zones and Medium residential zones. See the full submission attached.

### Attached Documents

File

Wayne Roberston final



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\* WAYME ROBERTSONAddress\* 2/14 BISHOP STREET, CHRISTCHURCH Postcode\* 8014Email robertsonsteel@yahoo.co.nz Phone no. 021 1157371

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

Organisation's name N/AYour role N/A

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

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

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

(a) adversely affects the environment, and

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

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

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

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

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

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

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

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

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

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

Signature W RobertsonDate 10 MAY 2023

Have your say

# Housing and Business Choice Plan Change 14

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

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

1. Designated areas for High and Medium Density Residential zones.
2. Rules relating to greater sunlight access for homes.

My submission is that:\*

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

see attached submission

I seek the following decision from the Council:\*

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

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

1. High Density zones be restricted to within the four avenues and where whole areas/land is to be developed outside of the four avenues
2. Medium Density zones should be limited to two storey developments (with an exemption for commercial buildings provided they do not impair sun or light for existing residential dwellings.

### **Submission on Housing and Business Choice Plan Change (Plan Change 14)**

Building intensity of residential dwellings in excess of two storeys should be limited to within the four avenues, thus protecting existing home owners' rights to light and sunshine. The exception to this should be where new subdivisions / whole areas are developed outside of the four avenues so purchasers know what they are buying and the possibilities of having reduced light and / or no sun for several months of the year are already known. This could have happened when the Pegasus township was built and other possibilities could be where a large area of land could be developed, e.g. the large empty site on Madras Street just north of Purchas Street could be built to three or four storeys (maximum).

Internationally, many cities have intense housing within the city zone and this should be the case for Christchurch. The area within the four avenues is large enough to accommodate increased and extensive development, and there are still many sites that could be intensively developed. In addition, it is well known and accepted that the intensity within the four avenues is already greater than in other parts of the city so when purchasers currently buy within the four avenues they know the intensity may be greater than beyond the four avenues, i.e. they know what they are buying into and willingly move into the area.

Existing home owners outside of the four avenues have bought their properties in good faith, expecting they will have light and sun as per the current arrangements, or that there will be minimal impact as currently it is well known that two storey buildings can be built. It is unfair and wrong to have that taken away by the Council by them amending the parameters. In addition, having a three or four storey building, or maybe even higher, built next door to an existing property impacts on the resale value of the affected property(ies) and the home owners will have no right of re-dress to claim any shortfall. This is grossly unfair as some home owners will be affected, i.e. those that have three or more storey buildings built next door to them, and some won't, i.e. those that will have no developments built next door to them. Inequitable situations will arise and it should never be the Council's intention to create these.

A great example of more intensive development within the four avenues is the One Central development in the East frame built by Fletchers. Developments, such as the Worcester Terraces development could have been many more than the three stor which have been built, thus providing even more accommodation, and any prospective purchasers know exactly what they are purchasing in terms of the effects of light and sun.

In summary:

- High-Density Zones should be restricted to within the four avenues or beyond where new subdivisions / whole areas are to be developed. High-Density zoning should not apply to any existing residential situations outside of the four avenues (with new subdivisions / whole areas to be developed being the exception). There should be no height restrictions regarding residential dwellings in High-Density Zones.
- Medium Density Zones should apply to all areas not classified as High-Density Zones and building heights for residential dwellings should be limited to two storey buildings. Commercial buildings could be exempt from this restriction provided there is no impact on light and sun to existing residential dwellings.

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Susanne and Janice **Last name:** Antill

**On behalf of:**

**Preferred method of contact:** Email

**Postal address:** 592 Harewood Road

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:** 8051

**Email:** susanneantill@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

submission to council (003)

## **Submission on Christchurch City Council District Proposed Plan (12 May 2023)**

We totally oppose the new planning rules in the Christchurch District Plan.  
These proposals would substantially alter the character of Christchurch for residents of Christchurch and detrimentally affect our quality of life.

It reflects a top down management by a foreigner with globalist allegiances.  
The general wording is non specific platitudes. It could mean anything.

1. We oppose replacing existing residential zones in the city with two new ones – a medium density zone and a high density zone.

What rationale? Are you planning for massive overseas population immigration into Christchurch for a 15 minute smart city when the birth rate of Christchurch residents is low, particularly after the mandated experimental, untested jabs on young New Zealanders which has probably sterilized many of them.

2. We oppose increased height limits of buildings. Christchurch is on an aquifer flood plane and subject to earthquakes. This is totally crazy.

3. What does this sentence mean: “ Special rules for housing and business to better reflect our city’s environment and climate”?

4. What does this sentence mean:” Heritage that should be protected, with a number of new buildings, items and interiors added to the Schedule of Significant Historic Heritage.”?

This does not make sense.

Are you trying to pull a fast one? And are you going to destroy anything that you do not deem to be of historical significance? Will you destroy the character of Christchurch the way you deconstructed and destroyed the Christchurch Library?

There is no mention here of 5G.

We totally oppose denser housing which will actually cut sunlight from residences.

We oppose 15 minute cities which will curtail our freedom

We oppose smart cities which will be detrimental to our health

We oppose 5G towers which pose a significant threat to both our freedom and our health

We oppose mass overseas immigration into Christchurch which is a globalist agenda not a Christchurch citizens agenda.

This council does not listen to what residents want and runs rough shod over the opinions and wishes of Christchurch residents. For example the Harewood Road Cycleway which was opposed by the majority of Harewood residents.

Susanne Antill

Janice Antill

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Jacq **Last name:** Woods

**On behalf of:**

**Preferred method of contact:** Email

**Postal address:** 6 Watford Street

**Suburb:** Strowan

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8052

**Email:** jacq.woods@xtra.co.nz

**Daytime Phone:** 0273636448

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

I do not wish to speak but if others make a similar submission, I will consider presenting a joint case with them at the hearing.

### Attached Documents

File

Jaca Woods submission

Have your say

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

RECEIVED

12 MAY 2023

Enr. 4.40pm

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\*

Jacq Woods

Address\*

6 Watford St, Strowan, ChCh Postcode\* 8052

Email

jacq.woods@xtra.co.nz Phone no. 0273636448

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

J Woods

Date

8-5-2023

Have your say

## Housing and Business Choice Plan Change 14

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

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

Infrastructure Servicing for Developments  
Section 14.2.8.5

"ensure that developments are serviced with all required infrastructure in an effective & efficient manner"

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 support the proposed provisions for all required infrastructure to service & support development in an effective & efficient manner.

I also support the intention to avoid significant adverse effects of development on existing infrastructures,

BUT - there are significant existing pressures in the Strowan area, especially in the vicinity of St Andrews College. There is ALREADY a very significant health & safety issue with traffic congestion, carparking congestion, "rat running" up Watford Street, parking on

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.)

(cont  
Pg ③)

That the High Density Residential Zone for the Strowan blocks west of Papanui Road - from Normans Road to Blighs, along Watford Street be revised to Medium Density Residential Zone to avoid unacceptable & unsafe escalation of the existing issues with infrastructure overload in our community



yellow lines, congestion & delays at intersections, especially Normans/Papanui Rd  
 • Normans/Strowan Rd.

The existing stormwater and waste water networks are already not coping with the demand. Several areas in the Watford St neighbourhood flood and roads have been closed recently during high rainfall events.

Intensification of substantial areas of Strowan, especially Watford Street as proposed in the Plan Change 14, will make these issues much worse and lead to unsafe transport infrastructure and unhealthy/poorly functioning stormwater & waste water networks.

St Andrews College is the only co-educational private school in the South Island with it's Special Character (Presbyterian), educating 1700+ students from pre-school - prep school - secondary school

It has a large wait list and will continue to attract students from across the South Island.

Also, it's facilities are used all year around (not just during school days) and the congestion is

This is a special area and needs special consideration so the school

and neighbourhood surrounding it, can live in harmony. 894

\* If High Density Developments were built with no carparking on site (as allowed) there would be no safe parking for them on the already congested streets (e.g. 2 hour parking on one side of the roads) This is unsafe & dangerous for elderly people, disabled people and for families for young children.

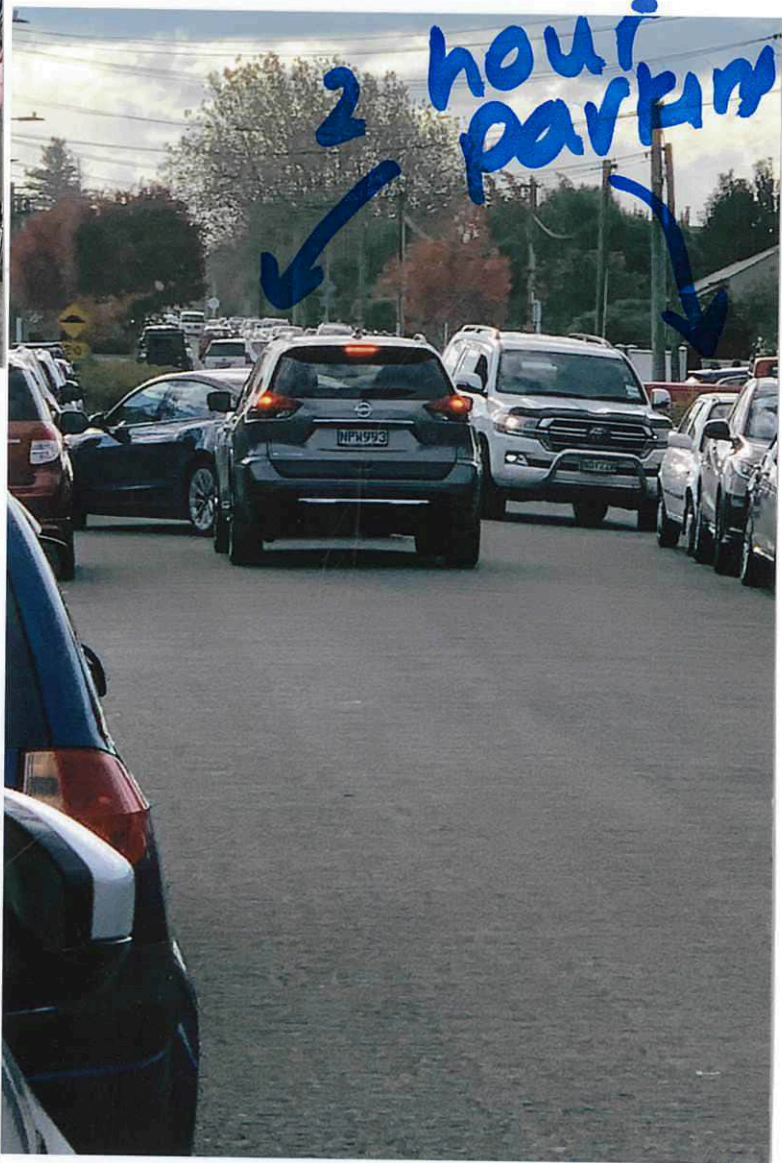


Norman's /  
Watford  
corner.



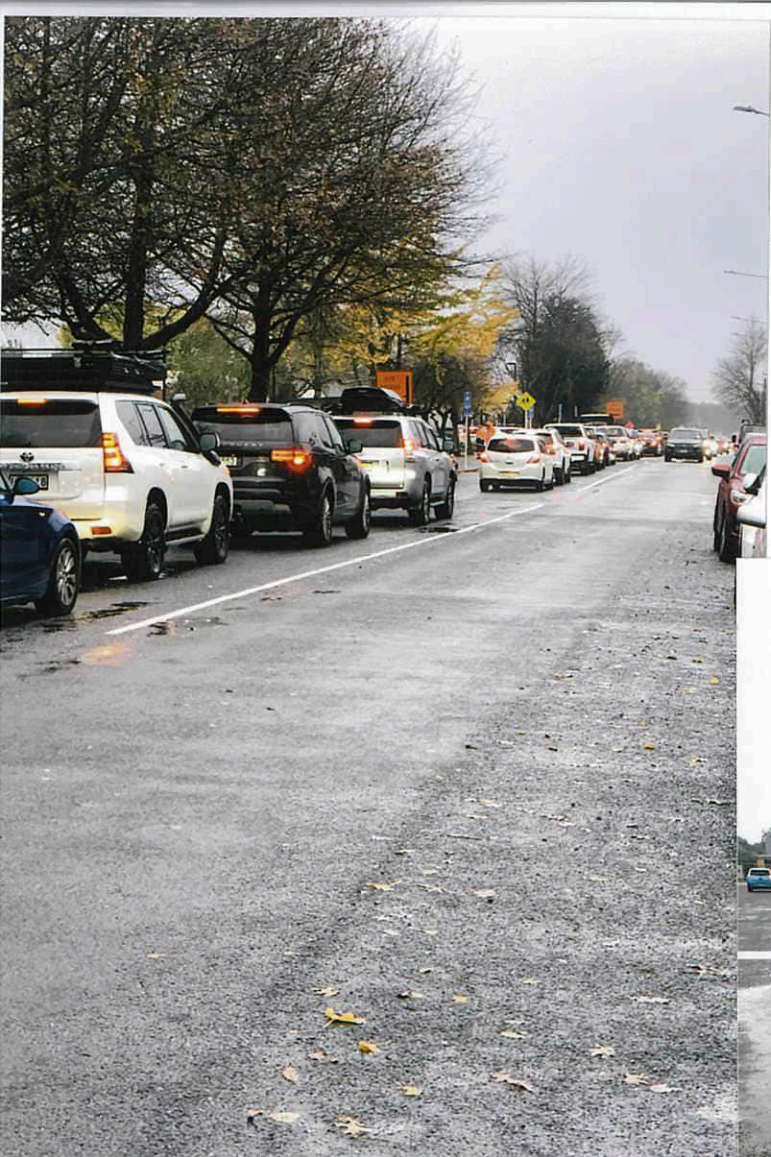
Normans Road

894  
4



Watford Street

Normans/Watford corner



→ a typical scene on Normans Road every morning and afternoon congestion everywhere!



Brenchley Ave!

*[Faint, illegible handwritten notes in the bottom left corner]*

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.)

Section 14.2.4.2 Policy - High quality, medium density residential development.

to encourage innovative approaches to comprehensively designed, high quality, medium density residential development which is attractive to residents, responsive to housing demands & reflects the planned urban character of an area.

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 suggest the proposed High Density Residential zone which is almost continuous down Papanui Road - one block either side is NOT consistent with the stated intent of this Section/Policy. It certainly does not support medium density residential development which is attractive to residents, responsive to housing demands & reflects the planned urban built character of an area. PTO

I seek the following decision from the Council:\*

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

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

That the High Density Residential Zone proposed for the Strowan blocks west of Papanui Road - from Normans Rd to Blighs Road along Watford Street be revised to Medium Density Residential zone. to avoid an unacceptable impact of the amenity/character of the Strowan community making it far less attractive to residents and which Certainly does not reflect the planned urban character of our neighbourhood

My concerns are -

The Strowan neighbourhood has an amenity character & fabric, a sense of community which is very attractive to residents - which is highly valued and worthy of retention

- there are a number of prominent trees & landscaping on properties which reinforces both the perception & reality of quality open space 'around' buildings, which clearly supports the Council's Urban Forest Plan 2023 initiative
- the majority of the homes are older, character homes
- most homes are on larger than average sections & a sense of open space is still present.
- 2 older homes adjacent to ours have recently been demolished and have been very well developed with 2 homes on each / 2 storey / ~~be~~ all with off street garaging and blend well with the existing character homes.
- ↳ the thought of a 4 → 10 storey development amongst these family homes is a very scary prospect!

6

- character homes on Watford St.



- Normans Rd new build existing character home

1



- new development on Watford St blends well with existing character homes



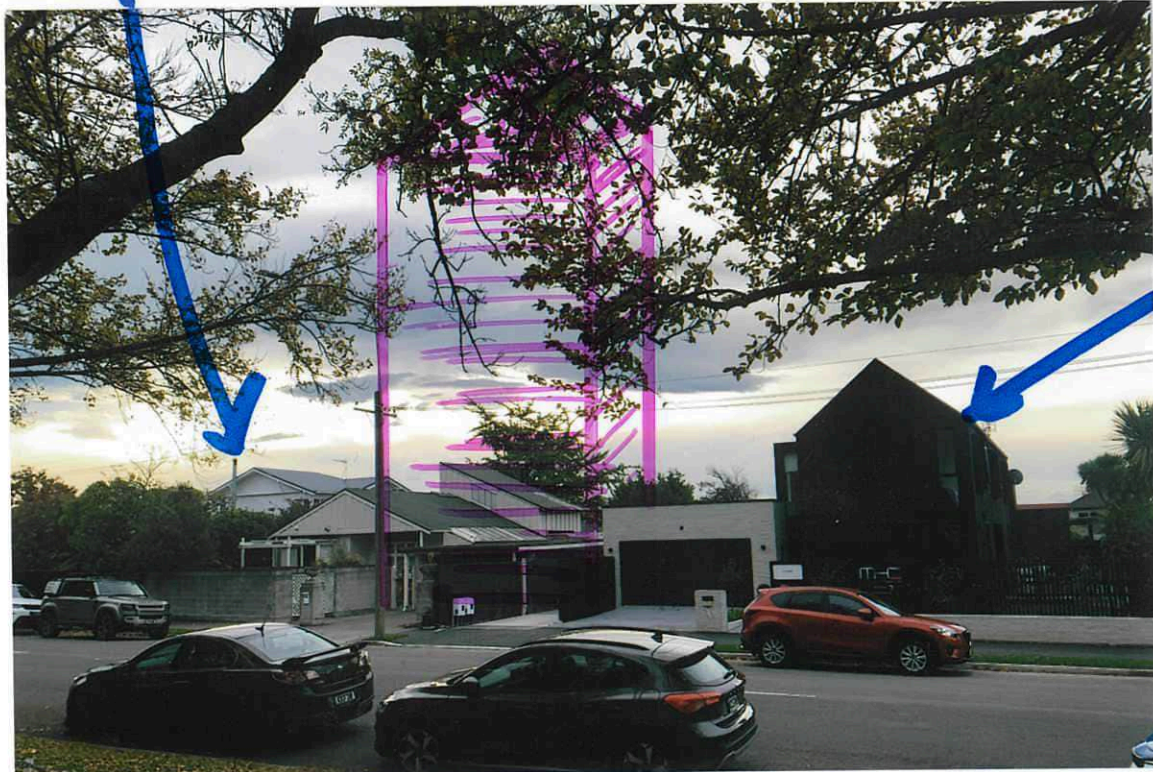


Attractive development on Wofford St —  
2 family homes (4 bedroom) with double  
garages.

100 year old  
character  
5 bedroom  
home

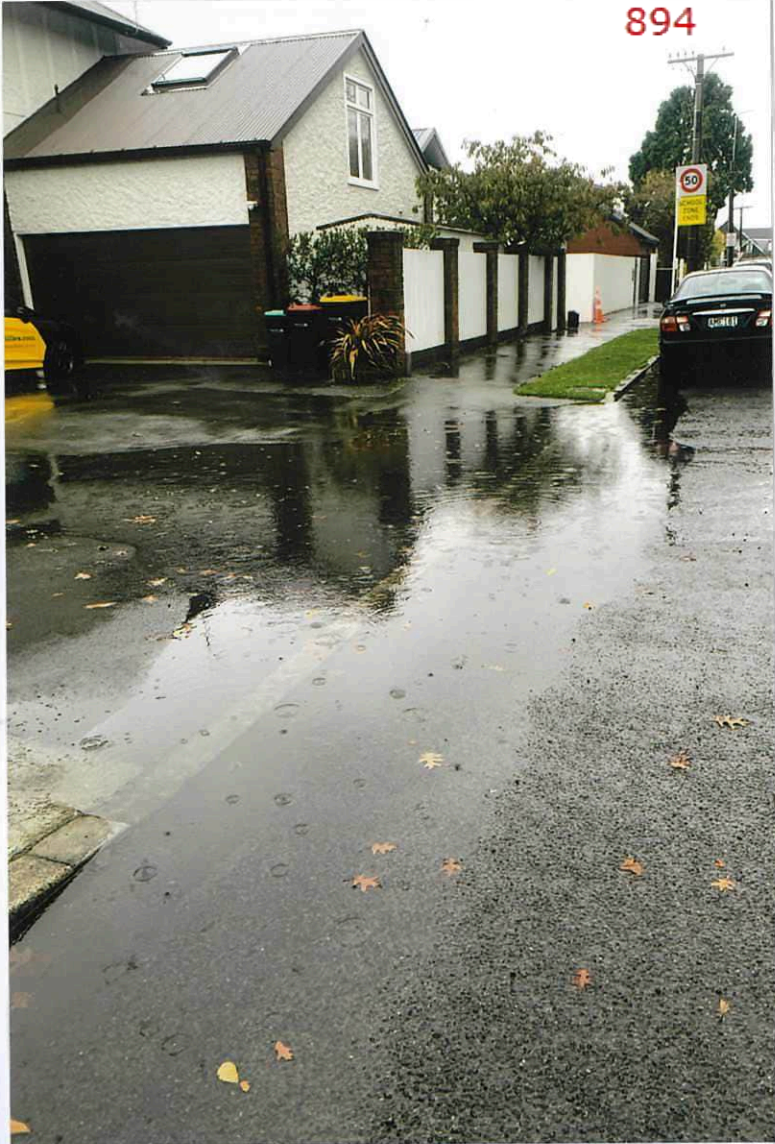
**PLEASE  
NO !!!**

(= this  
is only  
equivalent  
to a 4 storey !!)



2 new  
brand new  
homes on  
Normans  
Road





These photos are taken outside 93 Normans Rd which is proposed to be High Density Residential. As you can see, the existing storm water cannot cope with the runoff from 2 driveways.

In conclusion

PLEASE CHANGE OUR ZONE IN WATFORD STREET TO MEDIUM DENSITY ... as it is on the other side of Watford Street.

As I have stated in this submission, our street is already stretched to capacity with regards to car parking, traffic safety & congestion, infrastructure of waste water.

High Density developments along Watford Street would exacerbate all of these existing issues.

... and ... Watford Street is NOT adjacent to a commercial hub. ... where high density housing would be more suited.

... and due to the close proximity to St Andrews College (which is NOT a zoned school) ... health and safety should be of HIGH PRIORITY.

Thank you for considering my submission!  
GJM

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Tim **Last name:** Priddy

**On behalf of:**

**Preferred method of contact:** Email

**Postal address:** 6 Watford Street

**Suburb:** Strowan

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8052

**Email:** timdpriddy@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.

Additional requirements for hearing:

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

### Attached Documents

File

Tim Priddy submission

RECEIVED

2 MAY 2023

Tim 4:40pm

# 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\* TIM PRIDDY

Address\* 6 WATFORD STREET, STROWAN, CHRISTCHURCH Postcode\* 8052

Email timdpriddy@gmail.com Phone no. \_\_\_\_\_

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

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

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

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

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

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

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

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

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

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

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 Tim Priddy Date 10 May 2023

Have your say

## Housing and Business Choice Plan Change 14

### Infrastructure Provision

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

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

Section 14.2.8.5 Policy - Infrastructure servicing for developments  
(a) Ensure that developments are serviced with all required infrastructure in an effective and efficient manner

Section 14.2.8.6 Policy - Integration and connectivity  
(c) Avoid significant adverse effects and remedy or mitigate other adverse effects on existing businesses, rural activities or infrastructure

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 support the proposed provisions for all required infrastructure to service and support development in an effective and efficient manner. I also support the intention to avoid significant adverse effects of development on existing infrastructure.

But there are significant existing pressures in the Showan community, especially in the vicinity of St Andrew's College. This includes

- the supply of on-street car parking spaces cannot match the demand for car parking - illustrated by further recent extension of time-based parking restrictions on many surrounding streets.

Continued on page 3

I seek the following decision from the Council:\*

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

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

That the proposed High Density Residential Zone (HRZ) for the blocks in the Showan area, west of Papanui Road, from Normans Road to Blighs Road, be revised to Medium Density Residential Zone (MRZ) to ~~avoid~~ avoid unsafe and unacceptable escalation of the existing issues with transport infrastructure overload in the community.

- the continuing popularity and growth of St Andrews' College, with very little on-site carparking for staff and zero on-site carparking for students, inexorably increases the carparking issues. Any increase in housing intensification in the Strouan community (whether it be Medium Density Residential Zone (MRZ) or High Density Residential Zone (HRZ) will magnify this problem as new housing developments are no longer required to provide on-site carparking.
- the current traffic management issues associated with St Andrews' College pose a significant health and safety risk -
  - from congestion in Normans Road and surrounding streets at school drop-off and pick-up times in particular;
  - from irresponsible drivers double parking, parking over yellow 'No Stopping' lines, parking over driveways;
  - from drivers seeking alternate routes, (short-cuts, rat runs etc) on the local road network; and
  - from congestion at intersections on Papanui Road and Strouan Road/Waiwaka Road (higher classification roads),
 all ~~to~~ related to congestion.

These issues will be exacerbated by the proposed intensification of residential development in the Strouan community, but especially by the proposed HRZ over the several blocks to the west of Papanui Road, from Normans Road to Blighs Road.

Have your say

## Housing and Business Choice Plan Change 14

### Infrastructure Provision

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

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

Section 14.6.2 Built form standards

Note I am referencing this Section of the proposed Plan Change 14 but I recognise that this may not be the most appropriate section.

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 support the proposed provisions for required infrastructure to service and support development effectively and efficiently.

But in our immediate community of Stowman there are already pockets of flooding in rainfall events (in Brechtley Avenue for example) where both the stormwater and wastewater networks are overloaded and do not cope in these events. Infiltration of floodwater into the wastewater system gives rise to overflows of both systems with unsafe and unhealthy sewage contamination of surface water and consequential contamination of waterways, streams etc downstream.

Urban intensification is a significant contributor to this problem as the increase in 'hard' surfaces (roof, paved areas) and linked decrease in soft areas (grass, landscape areas) increases the quantity and speed of stormwater into side channels - often causing flooding (a major contributor to Auckland region flooding)

I seek the following decision from the Council:\*

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

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

That the proposed HRZ for the blocks in the Stowman area, west of Papanui Road, from Normans Road to Blighs Road, be revised to MRZ to avoid unsafe, insanitary, unhealthy and unacceptable escalation of the existing issues with stormwater and wastewater infrastructure overload in the community.

~~see~~ (continued on page 5)

over the Anniversary weekend 27 January - 2 February 2023).

These issues will be significantly exacerbated by the proposed intensification of residential development in the Stoway community; especially by or through the proposed HRZ area over many blocks west of Papenui Road (from Normans Road to Blighs Road) which is immediately adjacent to the existing problem area.



# Have your say Housing and Business Choice Plan Change 14

## CHARACTER/AMENITY

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

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

### 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 support the intention of this section in the proposed Plan Change 14. However, it belies belief that the proposed HRZ in the Strouan area, west of Papanui Road from Normans Road to Blighs Road could in any way be seen to be consistent with an in support of this Section and the wording of this section. In particular

- the Strouan neighbourhood/community has an amenity, character and fabric accompanied by a real sense of community, which is:
  - very attractive to families as residents,
  - highly valued and
  - worthy of retention

(continued on page 7)

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

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

That the proposed HRZ for the blocks in the Strouan area, west of Papanui Road, from Normans Road to Blighs Road, be revised to MRZ to avoid the degradation of the character and amenity of the neighbourhood which will impact negatively on the planned urban built character of the area.

- this community is characterised by a number of elements, including
  - still a significant proportion of older, quality, 'family' homes;
  - the homes are typically on good sized sections so a sense of open space is still present;
  - there are a number of prominent trees and landscaping on properties which reinforces the perception and reality of quality open space around buildings (which clearly supports Council's Urban Forest Plan 2023 initiative);
  - the number of new homes which have been developed are typically two storey, with a scale, density and quality generally in-keeping with the existing character and built form found in the surrounding Strawan Community.

Have your say

## Housing and Business Choice Plan Change 14

~~HRZ NOT CONSISTENT WITH~~

~~STATED INTENTION~~

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

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

Section 14.2.7 Objective - High Density Residential Zone

a High density residential development near larger commercial centres...

Section 14.2.7.2 Policy - high density location

- i Enable high density residential development with walking catchments of the 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

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 support the specific description of HRZ areas as proposed

But clearly the part of the Strawan Community proposed as HRZ does not meet the stated criteria

In studying the supporting information related to Plan Change 14, I suggest that there is an anomaly. The proposed zones on page 9 of the Consultation document, which has been confirmed through discussion with nominated, relevant Council staff, that the specific intention is to have

- a proposed 'larger Town Centre' zone in the vicinity of the Merivale commercial centre with an associated HRZ stretching along the spine of Papanui Road as far north as Heaton Street / Innes Road

(continued on page 9)

I seek the following decision from the Council:\*

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

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

That the significant infrastructure overload issues in the Strawan Community currently, especially in the vicinity of St Andrews' College, be mitigated by Council through following the approach which Council has outlined in the Consultation document.

That is, by limiting the HRZ area as detailed (north from the Merivale commercial centre to Heaton Street / Innes Road and south from the Papanui commercial centre to Blighs Road) and not extending the HRZ area between these two areas, along the stretch of Papanui Road through the Strawan Community.

- in a similar way, it is clear that a proposed 'larger Town Centre' zone is created in the vicinity of the Papanui commercial centre with an associated HRZ stretching along the spine of Papanui Road as far south as Blighs Road.

But the planning maps contradict this and show these HRZ areas as joined or continuous along the spine of Papanui Road.

Have your say

# Housing and Business Choice Plan Change 14

## CARPARKING PROVISION FOR VULNERABLE MEMBERS OF OUR COMMUNITY

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

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

Section 7.2.1.2 Policy - High trip generating activities

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

Section 7.2.1.5 Policy - Design of Carparking areas and loading areas

iii be accessible for people whose mobility is restricted.

### 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 fully support the intention of these sections (and others) in the proposed Plan Change 14.

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

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

This impact will be significant on both

- existing residents and
- residents living in new developments.

(continued on page 11)

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

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

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

That the proposed HRZ for the blocks in the Stouan area, west of Ipanui Road, from Normans Road to B lighs Road, be revised to MRZ to mitigate (in a small way) the significant adverse impact on 'vulnerable' communities in the Stouan area.

Unfortunately, under the proposed Plan Change 14,

'vulnerable' includes

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

dt

as increasingly they and their visitors will not be able to have an ability to park their vehicle near to their place of residence.

Whilst this will be an issue across the city, it will be exacerbated in the Strawn area, especially in the vicinity of St Andrews' College, where the current on-street carparking supply does not meet supply.

I have been unable to find any specific references in the proposed Plan Change 14, as to how this negative impact on vulnerable communities will be addressed, no mention of how it will be alleviated or mitigated.

It is clear that people will become less reliant on private vehicles but this will take many years of changed behaviour, a better public transport system, other modes of transport available etc - perhaps over several generations - but I cannot find how the transitional charge will be addressed.

If this is the case, it is of great concern that the proposed Plan Change 14 is so lacking in recognition of the issue and provision to mitigate and/or address.

Thank you for the opportunity to submit on the proposed Plan Change 14.

Tim Pridder

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

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

**On behalf of:**

**Preferred method of contact:** Postal

**Postal address:** 13 Earl Street

**Suburb:** Hillsborough

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8022

**Daytime Phone:** 0274901234

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

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

Note to person making submission:

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

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

Yes

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

### Attached Documents

File
Claire Coveney PC14

Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

Gender:  Male  Female  Non-binary/another gender

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

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

## \* Required information

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

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

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

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

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

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

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

(a) adversely affects the environment, and

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

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

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

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

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

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

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

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

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

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

Signature Claire Coverey Date 9-5-23



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.)

Infrastructure - MDRS

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.)

Medium-high density housing needs to include close to cycleways and rail corridors.

All medium-high density & future housing needs to be built away from close proximity to wetlands and rivers.

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.)

Recognition of rail corridors as a future alternative to reduce carbon emission & make people quickly from a to b.

Reopen passenger rail to Lyttelton (Cruise-ships), Rolleston, Rangiora, Lincoln

Safe cycleway to Lincoln.  
Stop rampant development in areas w/ poor road / no rail bus routes.

## Have your say

### Heritage Plan Change 13

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

Medium density subdivision

#### 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.)

Both low density & medium density need to retain established trees. I am seeing a lot of clear felling of trees in suburbs that have well established trees up to 100 years old. Given our loss of biodiversity and the benefits of trees (health, biodiversity, shade, privacy, noise reduction) clear felling needs to be stopped. Pollution, noise. Plus commitment by council to reduced carbon emissions.

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

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

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

That a moratorium be placed on clear felling of sections in all subdivisions and rebuilding in all Christchurch zones.

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Evelyn **Last name:** Lalahi

**On behalf of:**

**Preferred method of contact**

**Postal address:**

**Suburb:**

**City:**

**Country:** New Zealand

**Postcode:**

**Daytime Phone:**

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

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
Lalahi

**Mulder, Andrea**

---

**From:** Evelyn & Sione Lalahi <selalahi@gmail.com>  
**Sent:** Friday, 5 May 2023 9:06 am  
**To:** Engagement  
**Subject:** Feedback on Our proposed Housing and Business Choice Plan Change (PC14) / 531

Re PC14 : Sunlight Access.

My concern re densification is..

- ANGLES OF SUN ONTO NEIGHBOURING PROPERTIES.

Many developments do take this into account, but many do not.

This is primarily a WINTER issue, though not entirely.

Most new residential buildings have good sunlight access for their own needs.

BUT when a 2-3 story building cuts off, for example, morning sun on the northeast, there is frequently a loss of both light and heating for several hours.

This causes deprivation for existing homes, resulting in..

- increased power bills
- increased dampness in both houses and gardens.
- changes in life habits and loss of wellbeing for some.
- potentially loss of property value for future sale.

Many of those affected are senior citizens and young families.

Yours sincerely  
Evelyn Lalahi.

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Denis **Last name:** McMurtrie

**On behalf of:**

**Preferred method of contact** Email

**Postal address:** 81 Papanui Street

**Suburb:** Papanui

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8053

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

**Daytime Phone:**

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

I will consider presenting a joint cas with - With Colin

### Attached Documents

File

Denis McMurtrie submission

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\* Denis McMurtrie  
Address\* 81 Paparoa St Postcode\* \_\_\_\_\_  
Email mcmurtrie@extra.co.nz Phone no. \_\_\_\_\_

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

Organisation's name \_\_\_\_\_  
Your role Resident

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.

Denis McMurtrie

D. McMurtrie of m

with Colin  
McGarra

## Have your say Heritage Plan Change 13

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

The impact of MDH on the drainage infrastructure on Paparua St. and the removal of Paparua St from being rezoned away from <sup>high</sup> residential

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 on separate sheet submission (1) - (11 Pages)

I also support Colin McQuinn's Submission including + his Final Decision sought. (P3 of his submission)

I seek the following decision from the Council:\*

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

No Rezoning on Paparua St,

✓

G. J. M.

Submission ①

Parts of the infrastructure of Paparoa St are too fragile to accommodate high density residential development.

② \*Steven Bensburg in a report to the CCC in 2015 stated: "I am familiar with the Cranford Basin area and the wider land drainage system and the requirements for the Cranford Basin for storm water purposes" (③ page 1" UDCCD-Upper Dudley Creek Diversion) which intercepts Dudley Creek at the Paparoa St Culvert and diverts 2.5 m<sup>3</sup>/s from a 1350mm pipeline in Paparoa St and discharges water into the main UDCCD channel which runs through Cranford Basin.(p4) Local peaty soil in the Paparoa area has meant ground levels have settled by an average of 20mm per year"

Having lived at No 87 Paparoa Street from 1982 to 2010 and at No 81 ever since, I remember the distinct bands of peat and sand evident in the soil profile when the 1350 mm pipeline was installed in 1985. Over my 41 years in the street, I have personally observed and experienced the aforementioned continual settling and subsequently ground shaking especially when old houses are repaired and re-piled, and pile driving occurs when new buildings are constructed.

It is of considerable concern to the current residents that the foundation construction of up to 6 story dwellings (④ see submission "Land use -Geology") will impact the old culvert buried in the peat and sand and exacerbate the sinking to even more than 20mm per year. In addition, the proximity of larger and heavier buildings and even, the considerable increase in traffic since 1985, could make the situation worse. Even more importantly: if the vital culvert is damaged and drainage system compromised, down-stream flooding will increase.

Decision Sought: No Re Zoning of Paparoa St.

- ① submission report.
- ② Bensberg report.
- ③ " " page 1 UDCCD creek diversion.
- ④ Land use geology Page 2 - Colin McGevin submissions.

*of m.*



\*  
②

**BEFORE CANTERBURY REGIONAL COUNCIL AND  
CHRISTCHURCH CITY COUNCIL  
AT CHRISTCHURCH**

In the matter of                      the Resource Management Act 1991

And

In the matter of                      Notices of Requirement by Christchurch City Council  
and New Zealand Transport Agency for designations  
for Northern Arterial, Northern Arterial Extension and  
Cranford Street Upgrade

And

In the matter of                      Related Resource Consent Applications

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**STATEMENT OF EVIDENCE OF STEPHEN DAVID BENSBERG FOR  
CHRISTCHURCH CITY COUNCIL**

**Dated 8 April 2015**

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**BUDDLE FINDLAY**  
NEW ZEALAND LAWYERS

Barristers and Solicitors  
Christchurch

Solicitor Acting: **Kerry Smith**  
Email: [kerry.smith@buddlefindlay.com](mailto:kerry.smith@buddlefindlay.com)  
Tel 64-3-379 1747 Fax 64-3-379 5659 PO Box 322 DX WX11135 Christchurch 8140

*KS*

#### **Urban Design - Better Alternatives Available**

There are other areas around Papanui that do not have tree-lined streets, have higher elevation and are further from the sea. An arc centred around Northlink Shopping Precinct, starting at Harewood Road and ending on Main North Road would provide a superior alternative option. The land there is farther from the sea, has a higher elevation, and has a lower liquefaction vulnerability. It is also closer to the Christchurch ring road – a major public transport corridor.

#### **Urban Design - Papanui Heritage Designations (Plan Change 13)**

Some streets around Paparoa Street are "Memorial Avenues", which have been designated as heritage streets by the 2015 Independent Hearings Panel. The Council has acknowledged this in Plan Change 13 (16 Papanui War Memorial Avenues).

#### **Urban Design - Intermingling Heritage Houses with Apartment Blocks**

From both a visual and practical perspective, the intermingling of traditional Christchurch housing in tree-lined streets with apartment buildings is, quite simply, bonkers. This is much more than just 'recession planes'. It is the very essence of Christchurch. Regardless of Government Requirements, this will surely lead to the destruction of Christchurch's "Garden City" reputation.

#### **Land Use - Requirement for High Density Housing in Christchurch**

The re-zoning of Paparoa Street and the Papanui area is unnecessary, because there are large tracts of land in Christchurch already zoned high density residential land that are sitting undeveloped. These will take many years to develop and populate, and avoid the requirements to rezone Paparoa Street and its surrounds.

#### **Community - Destruction of Property Values**

The first apartment to go up in the general Papanui area will lead to a downward slide of property value across the area. For many people, whose property is their major financial asset, this will cause widespread dissatisfaction.

#### **Decisions Sought:**

Given the multiplicity of items of concern, we propose that the boundary line for High Density Residential zoning be along Harewood Road and Main North Road to the North and West, and the area to the South and East of this boundary line is zoned Residential Suburban.

the proposed stormwater quality treatment works, the need for the provision of compensatory flood storage and how this can be provided.

8. I will also comment on issues that have been raised by submitters and by Council's planning officer in his/her Section 42A report.

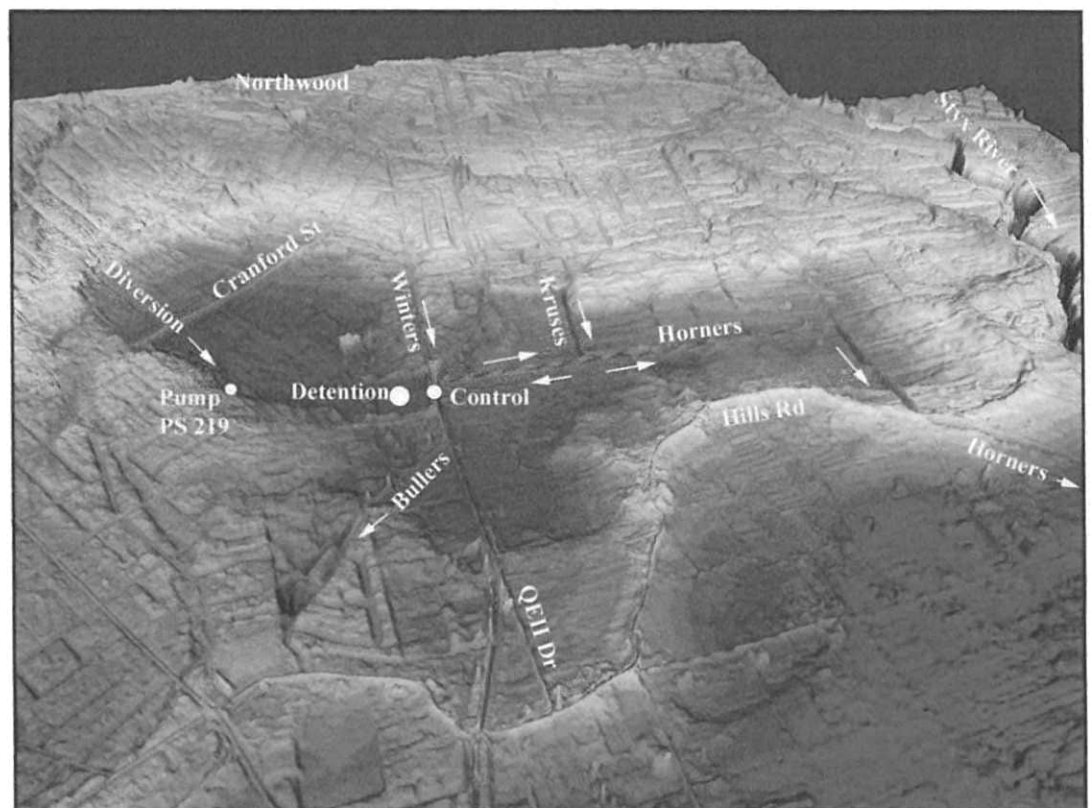
#### DETAILED DESCRIPTION OF PROPOSAL

9. A description of the proposal and its inclusion within the Styx SMP as a natural ponding area is provided by Mr Couling.

#### DESCRIPTION OF SITE,

10. A description of the Cranford Basin is detailed in the evidence of Mr Couling.
11. Figure **SDB1** is a 3D image generated from LiDAR (Light Detection and Ranging) aerial survey data, showing the Cranford 'basin' shape and the outlet at Bullers Drain.

Figure SDB1: 3D image of Cranford basin



\*3

## DESCRIPTION OF STORMWATER NETWORK

12. The Cranford Basin is drained by a combination of council utility drains and local farm drains. Two council drains, Tysons Drain and Winters Road Drain are located on the western and northern sides of the Cranford Basin (Cranford West & East areas). These drains intercept runoff from the west and north and convey the runoff around the Cranford Basin west and east areas to Bullers Drain on the eastern side of Philpotts Road, which then discharges to the lower Dudley Creek Diversion (DCD). The local farm drains within the Cranford West discharge directly to the **Upper Dudley Creek Diversion (UDCD)**. The local farm drains within the Cranford East are connected to the Croziers Drain, a public utility drain, which then discharges to the UDCD via a 375mm Pipe and weir at Pumping Station 219.
13. Figure **SDB2** is a plan of the local drainage network in the Cranford Basin West & East areas and include:

SDB2: Local Drainage Network



- (a) Tysons Drain, flows in a north-easterly direction from Grassmere Street to Winters Road. It serves a mix of rural and urban land uses. A weir at

Cranford Street allows a limited discharge to drain down Cranford Street West Drain to UDCD.

Tyson's Drain, intercepts stormwater runoff from the north-west of Cranford Basin and joins Winters Road Drain before the combined flow discharges into Bullers Drain.

- (b) Winters Road Drain, flows along the southern boundary of Winters Road from Tyson's Drain to Bullers Drain on the east side of Philpotts Road.
  - (c) UDCD intercepts Dudley Creek at the Paparoa St culvert and diverts up to 2.5 m<sup>3</sup>/s into a 1350mm pipeline in Paparoa St. The pipeline picks up the flow from Papanui Drain and discharges into the main UDCD channel which runs through Cranford Basin. The flow from this channel is then pumped by Pump Station (PS) 219 into another pipeline that discharges into the main Dudley Creek Diversion at Philpotts Road.
  - (d) Croziers Drain discharges into UDCD immediately upstream of PS 219. It runs through the lowest part of the basin to drain pastoral land.
  - (e) Cranford Street West Drain flows along the western boundary of Cranford St from Tyson's Drain to UDCD.
  - (f) Cranford Street East Drain flows along the eastern boundary of Cranford St and discharges into UDCD.
14. PS 219 provides the necessary lift to allow the stormwater to discharge via the Philpotts Road pipeline to the main Dudley Creek Diversion. The DCD then discharges to Horseshoe Lake and then the Avon River.
15. Because this area is lower than the surrounding land a pumping station is required to 'lift' the stormwater up out of the basin into the council land drainage network. If the pumping station was not present to maintain ground water levels and provide flood mitigation the Cranford Basin area would experience permanent ponding.

#### **FLOOD HISTORY & OPERATION OF FLOOD STORAGE**

16. Historical pre-urban flooding in the Cranford Basin area was due to a combination of factors including high rainfall and associated runoff flowing into the Cranford Basin area, high flood levels in the receiving environment (Dudley Creek), a lack of capacity in the natural drainage channels and back water effects would have resulted in large open areas of ponded water.

RAM

Colin M<sup>c</sup>Gavin submissions:

Our submission:

1 Transportation - Walkability

Paparoa St is beyond reasonable walking distance from Northlands Mall. It is completely impractical to walk 1.8 km carrying a weekly supermarket shop. We already notice abandoned supermarket trolleys on streets closer to the Northlands Mall than Paparoa Street. It is also far greater than the Council's own requirement of 1.2 km walkability for the City Centre and smaller walking catchments for other centres (page 12 of Council document 'Have your say on the District Plan Changes'). See attached Photo01.WalkingDistance.jpg

2 Transportation - Parking

Paparoa Street is being squeezed at both ends by parking requirements, and Paparoa Street is already hazardous for traffic entering and leaving Papanui Road. In the north, Paparoa Street School is extremely busy with parents dropping off and picking up students. Adding apartments that have no off-street parking requirement will cause significant traffic chaos (and safety risks) during the school terms. In the south, many (unknown) people use Paparoa Street as an all-day park while they catch the bus on Papanui Road, meaning that street parking availability is very limited. Adding apartments that have no off-street parking requirement will cause significant traffic chaos and frustration.

3 Community - School Safety

Paparoa Street is host to Paparoa Street School - a high-quality primary school that saturates the parking in Paparoa St during school days. Adding apartments that have no off-street parking requirement (so they park on the street all day) will cause significant traffic chaos during the school terms and seriously impact on parent and child safety. See attached photos Photo03.Saturday.jpg and Photo04.DuringSchool.jpg

4 Infrastructure - Water, sewage, stormwater

Paparoa Street was conceived for urban residential living, and has an infrastructure to match. This means that water reticulation and sewage, and electricity supply have been designed with capacity for residential dwellings, not high-density apartment living. Converting Paparoa St to high density living will place an unknown strain on existing infrastructure.

5 Demographics -Social Impact

The social impact of apartment-living people is undetermined. Apartment dwellers will likely require a lively café and entertainment environment, and a 1.8 km walk to the Northlands Mall and back is unlikely to appeal to apartment dwellers. This is likely to lead to empty apartments, a prelude to a ghetto. We have been unable to locate any City Council research on this topic.

J.M.

6 ~~6~~ ~~4~~ **Land Use - Geology**

The land quality in Paparoa Street is likely not suitable for high density living. If new two storey houses in this area need four-metre driven piles, what would a six storey apartment block need?

7 **Land Use - Elevation Suitability**

The ground elevation at Paparoa Street is 9-10 metres above mean sea level. The impact of future weather and marine events at this elevation is unknown, but the future impact of climate change and sea level rise must be taken into consideration.

8 **Land Use - Earthquake and Liquefaction Suitability**

The Tonkin + Taylor liquefaction vulnerability map produced for Christchurch City Council defines the Papanui area (from Mays Road through to Bishopdale) as 'Medium Liquefaction Vulnerability'. The 'Liquefaction Damage Scale' Tonkin + Taylor provide has a scale of 1 to 7 (1 = less damage, 7 = more damage). Normans Road through Chapel Street has a rating of 5 out of 7 - higher damage risk from liquefaction.

9 **Urban Design - Street Scene**

Paparoa St and its surrounding streets are visually attractive tree lined streets, typical of those that support the Christchurch image of "The Garden City". They are a pleasant blend of restored 1900s villas and new houses that have been built in a manner that blends new with the old. Removing existing trees and gardens to install high-rise apartment blocks will destroy this image.

See attached photo Photo02.TreeLinedStreet.jpg

10 **Urban Design - Papanui Designation as "Large Town Centre"**

Papanui is no longer a 'Large Town Centre', and should now be designated as a 'Town Centre'. In 2008, the Main North Road in Papanui had seven (7) bank branch offices (all with ATMs), an Insurance company and a Post Office. In 2023 it has one bank, one ATM, no Insurance company and no Post Office.

See attached photos Photo05.MainNorthRoad-2.Jan2008.jpg, Photo06.MainNorthRoad-2.Aug2022.jpg, Photo11.PapanuiRd.Apr2023.jpg and Photo12.MainNorthRoad.Apr2023.jpg.

11 **Urban Design - Focal Point of Papanui Town Centre**

The current focal centre for the High Density Residential zoning is the "Old Papanui Shopping Precinct" in Papanui Road, Main North Road and the Northlands Mall. The retail shopping focus has now moved to the new shopping precinct (Northlink) on Langdons Road. As a result of this shift of retail, there are now several empty shops in Papanui Road and Main North Road.

See attached photos Photo07.MainNorthRoad-1.Jan2008.jpg and Photo08.MainNorthRoad-1.Aug2022.jpg, Photo09.LangdonsRoad.Jan2008.jpg and Photo10.LangdonsRoad.Aug2022.jpg.

12 **Urban Design - Apartment Blocks should be in Clusters**

Apartment blocks have their place in a city, but they should be grouped together so that essential services can be designed and provided in bulk, and water runoff from large wet weather events can be properly predicted and managed.

*of.m*

**Urban Design - Better Alternatives Available**

There are other areas around Papanui that do not have tree-lined streets, have higher elevation and are further from the sea. An arc centred around Northlink Shopping Precinct, starting at Harewood Road and ending on Main North Road would provide a superior alternative option. The land there is farther from the sea, has a higher elevation, and has a lower liquefaction vulnerability. It is also closer to the Christchurch ring road – a major public transport corridor.

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**Decisions Sought:**

Given the multiplicity of items of concern, we propose that the boundary line for High Density Residential zoning be along Harewood Road and Main North Road to the North and West, and the area to the South and East of this boundary line is zoned Residential Suburban.





## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Anton **Last name:** Casutt

**On behalf of:**

**Preferred method of contact** Postal

**Postal address:** 9 Johnson Street

**Suburb:** Sydenham

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8023

**Daytime Phone:**

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

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

Note to person making submission:

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

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

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

Additional requirements for hearing:

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

### Attached Documents

File

Anton Casutt submission PC14 Redaction please

Save time and do it online

ccc.govt.nz/haveyoursay

Have your say

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

Clause 6 of Schedule 1 Resource Management Act 1991

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

Gender:  Male  Female  Non-binary/another gender

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

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

\* Required information

Name\* Anton Casutt  
Address\* 9 Johnson St, Sydenham Postcode\* 8023  
Email \_\_\_\_\_ Phone no. \_\_\_\_\_

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

Organisation's name \_\_\_\_\_  
Your role \_\_\_\_\_

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

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

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

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

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

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

- I wish to speak in support of my submission on Plan Change 13 - *don't want to speak on this*  
 I wish to speak in support of my submission on Plan Change 14  
 I do not wish to speak.

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

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

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

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

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

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

Signature Anton Casutt Date 03/05/2023

Have your say

## Housing and Business Choice Plan Change 14

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

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

Residential building intensification  
in the suburbs

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 residential building intensification in the suburbs. — 1) How can you enjoy your property if you have

- Reasons residential building intensification either side of you
- 2) More noise <sup>prevent to be detrimental to peoples health</sup>
  - 3) Lack of privacy
  - 4) Less sunlight
  - 5) More shading
  - 6) A decrease in health and wellbeing for people and animals because
  - 7) more input from neighbours, not less. More power for neighbours.
  - 8) less demand for your property if you have intensive residential housing either side of you
  - 9) Identikit housing
  - 10) Lack of soundproofing
  - 11) methodology of building and land stabilisation
  - 12) Noise of building and shaking of ground from land stabilisation

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.)

of less space and less sunlight and more noise.

- 13) Lack of enforcement of rules

- 1) more rules for noise control and better enforcement of all rules
- 2) more <sup>power and</sup> input from neighbours not less.
- 3) more consideration for neighbours when there is building work being done or land stabilisation work
- 4) A change in methodology, including garages and accessory buildings.
- 5) Rules for people and animals living in residential intensification builds

- 6) ~~More~~ sound proofing in new builds also in ceilings and garages and accessory buildings

## Our proposed Housing and Business Choice Plan Change (14)

### Submitter Details

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

**First name:** Marie **Last name:** Gray

**Organisation:** Summit Road Society

**On behalf of:**

**Preferred method of contact** Email

**Postal address:**

**Suburb:**

**City:** Christchurch

**Country:** New Zealand

**Postcode:** 8245

**Email:**

summitroadsocietysecretary@gmail.com

**Daytime Phone:** 03 349 3409

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
Summit 1 of 2
Summit 2 of 2

**Mulder, Andrea**

---

**From:** Secretary Summit Road Society <summitroadsocietysecretary@gmail.com>  
**Sent:** Friday, 19 May 2023 10:50 am  
**To:** INPC Business Support  
**Subject:** Re: query please  
**Attachments:** SRS Submission CCC District Plan changes Apr23.docx

Hi Andrew, thank you for getting back to me.  
Here is our submission. Please let me know if you need it in a different format.

Thank you very much for your help,  
Marie

Marie Gray  
Secretary  
Summit Road Society

(03) 3493409  
027 4702020

On Fri, 19 May 2023 at 10:27, INPC Business Support <[INPCBusinessSupport@ccc.govt.nz](mailto:INPCBusinessSupport@ccc.govt.nz)> wrote:

Hi Marie

Sorry to take so long to get back to you on this and the trouble you had with our system

Can you please just email me your submission on behalf of the Summit Road Society and we will backdate it to the 12<sup>th</sup> of May.

Kind regards

**Andrea Mulder**

**Senior Planning Support Officer**  
Development Support Team




03 941 5076 027 707 8227




[Andrea.Mulder@ccc.govt.nz](mailto:Andrea.Mulder@ccc.govt.nz)



Te Hononga Civic Offices, 53 Hereford Street, Christchurch

 PO Box 73013, Christchurch 8154

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

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**From:** Secretary Summit Road Society <[summitroadsocietysecretary@gmail.com](mailto:summitroadsocietysecretary@gmail.com)>  
**Sent:** Sunday, May 14, 2023 3:40 PM  
**To:** Engagement <[engagement@ccc.govt.nz](mailto:engagement@ccc.govt.nz)>  
**Subject:** query please

Kia ora,

Can you please confirm if the Summit Road Society's submission on the district plan changes 13 and 14 went through OK on Friday. I normally get a confirmation email although it's sometimes delayed and/or spammed. I was having technical issues with the submissions portal and I had to try several times but it seemed to go through in the end. I've checked my inbox and spam and no confirmation as yet.

Regards,

Marie

Marie Gray

Secretary

Summit Road Society

(03) 3493409

027 4702020

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.





a passion for the Port Hills

## Our Hills, Our Heritage

The Summit Road Society is a grassroots conservation charity based in Christchurch. The Society was formed in 1948 to further the vision of Harry Ell to preserve and protect the Port Hills and provide for public access. We own and manage four reserves on the Port Hills and also lead the backyard and community trapping project 'Predator Free Port Hills'. Thank you for the opportunity to provide feedback on the changes to the District Plan.

## Feedback on Plan Change 13 and 14

- We are pleased to see no change to the existing residential areas on the Port Hills. The Society has a long history of opposition to development on the open space areas of the Port Hills. We want to ensure that the ecological, landscape and recreational benefits of the hills are maintained for future generations.
- We support the following items as qualifying matters:
  - Matters of national importance including sites of cultural, heritage and ecological importance, areas of high-risk natural hazards and significant trees.
  - Public open space areas
- We cannot comment on the other qualifying matters as they are outside the mandate of the Summit Road Society. However, we support action on climate change to lower emissions and note that intensification done well is a key strategy to achieve this. We also want to ensure that intensification of housing is in line with the special character of the Port Hills including cultural, heritage, ecological and recreational values and considers hazards such as rockfall risk, coastal erosion and inundation, flooding, slips and risk of wildfires.
- We note that while most of the Port Hills is likely to be covered by the public transport accessibility qualifying matter in the short term, this may change over time as public transport routes increase. This is why we need a Port Hills plan. This would enable the recreational, ecological and cultural values of the hills to be recognised and provide for integrated management of issues around sediment, reforestation, biodiversity, recreation, erosion, fire risk, housing and anti-social behaviour.
- We value protecting our existing tree canopy cover. Christchurch has a low tree canopy cover compared to other cities and it is important that existing mature trees are retained. Trees sequester carbon, they provide shade and shelter, they provide habitat for birds and invertebrates and they support recreational and community wellbeing. We therefore support the inclusion of Significant Trees as a qualifying matter and we would like to see the Financial Contribution structured to incentivise keeping existing mature trees.
- That being said there may be valid reasons for removing mature trees for safety or ecological reasons. For example, some exotic tree species are considered weed species in high biodiversity areas of the Port Hills. A tree on a residential property may be a significant seed source and on balance, the environmental risks outweigh the environmental benefits the mature tree brings.





a passion for the Port Hills

We would like to ensure that there is a pathway to allow for removal of mature trees in these situations.

- We support the proposal to use the Financial Contribution process to ensure a tree canopy cover however would like to see it increased from 20% to 25%. Currently Christchurch City only has 13.56% canopy tree cover. Canopy tree cover is 30.6% in Wellington. We also support an increase to 25% tree canopy cover in road reserves.
- We would like to see prioritisation of native plantings wherever possible. Backyard biodiversity helps support ecological restoration across the city and creates food and habitat for native fauna.
- We would like the Financial Contribution expanded to include riparian planting along waterways including small creeks. Riparian planting along waterways helps reduce erosion and sediment runoff and enhances habitat for native fauna. Riparian planting usually includes a mixture of trees, grasses and shrubs.
- It is a vital that housing development on the hills does not lead to increased sedimentation into our waterways and there are appropriate regulatory tools and compliance in place.