

3 February 2020

Christchurch City Council  
Attention: Shona Jowett

By email: [shona.jowett@ccc.govt.nz](mailto:shona.jowett@ccc.govt.nz)

Dear Shona,

## **APPLICATION FOR RESOURCE CONSENT RMA/2019/1330, 25 OXFORD STREET AND 3, 5, 7 AND 9 LONDON STREET**

1. The letter below sets out the proposed changes to the plans for the above application, noting the updated plans that were sent to Council on 14 January 2020. These changes were undertaken following consultation with the Council and are contained within **Attachment 4**.
2. A summary of the design changes made since the resource consent submission on June 14<sup>th</sup>, 2019 are detailed below:
  - Adjusted the roof pitch to minimise height above the 12m height limit. The original building was proposed to have a maximum height of 15.5m above ground level, comprising of a 12m building height at London Street and a further 2m height for rooftop structures (pergola over the rooftop terrace). The updated building height will have a maximum height of approximately 13.2 above ground level, and a further 1.6m for the rooftop structures (pergola over rooftop terrace);
  - Changed the cladding to Kingspan metal, each building will have its own pattern;
  - Introduced texture to the basement and ground floor exterior concrete walls as requested by Council;
  - The building has been moved closer to the western boundary with the two building blocks along the western boundary moved. The blocks have been moved to create a more generous space between buildings;
  - The lift has been rotated to open towards the south and the harbour view;
  - Updated basement and parking layout including vehicle ramp gradients revised ;
  - The glazed area at ground floor has been updated due to fire engineer input. The updated glazing area has resulted in a decrease in glazing from 68% to 67% along the northern elevation and an increase in the amount of glazing along the eastern elevation from 22% to 37%. The development will continue to infringe Rule 15.6.2.3 as the building's eastern elevation is not provided with a minimum of 60% glazing and the building's veranda is not proposed to run along the full length of the Oxford Street road boundary;



- The tree at the entrance on the ground floor has been removed to allow for the development of sculptures and artwork with the building's commercial tenants;
  - Included two concertina mesh gates on the ground floor for security purposes at night to ensure CPTED objectives are met;
  - Reduced the number of apartments from 26 to 20 to allow for the introduction of one and two-bedroom residential units;
  - The first and second floor walkway area has been increased to provide additional outdoor living area opportunities with an area with a table, planters and seating added on each floor;
  - Updated roof top deck layout to include various outdoor activity spaces and increased area;
  - The building's window locations have been moved to line up, so they are more 'symmetrical' and in keeping with the surrounding buildings;
  - Developed window details to show a range of window types and their location and to demonstrate the proposed Juliet balcony windows;
3. The proposed changes will not result in any additional non-compliances, while the existing non-compliances that were proposed under RMA/2019/1330 are detailed above and below in the transport amendments.

### **Transport Amendments**

4. Ms. Williams, Novo Group Transport Engineer and Planner, has provided the following notes on the transport related changes.
5. The key changes from a transport perspective are:
- Reduction in the number of residential units from 26 to 20.
  - An increase in the first floor gross floor area from 248m<sup>2</sup> to 260.34m<sup>2</sup> (but no increase in public floor area).
  - The changes to the District Plan under section 71 of the Greater Christchurch Regeneration Act ('GCRA') has amended the car parking requirements in Lyttelton. Based on the amendments to the rules, the required car parking for the proposed residential option (Table 6) is 17 spaces (after permitted reduction factors are applied) and the short fall in car parking is therefore 11 spaces (noting that 6 spaces are proposed). There is no parking requirement for the guest accommodation option (Table 7).
6. The proposed changes to the development result in a reduction in the District Plan parking requirement in Table 6 of the ITA from 64-70 spaces to 58-63 spaces and in Table 7 from 67-73 to 62-68. Accordingly, the shortfall is therefore between 52-62 spaces. Refer to Attachment 1 for the updated tables.



7. The fully operative changes to the District Plan transport rules that were approved under section 71 of the GCRA are not able to be applied to this application as the application was lodged prior to this plan change, however, now that the plan change is fully operative and beyond challenge the new rules will be given significant weight in the Councils and Applicants evidence.
8. Note that the pool area indicated on the amended plans has decreased (from 87.5m<sup>2</sup> to 40m<sup>2</sup>) however rather than re-calculate the District Plan requirement on the reduced area shown it is proposed that the application will be assessed on 87.5m<sup>2</sup> maximum pool area. This reflects that the final pool area will be subject to tenants' design and some flexibility is needed.
9. Also note that the basement plan showed an error in respect of the ramp gradients, these will be a maximum of 1:4 with a minimum of 2.0m wide grade transitions at 1:8. This complies with the District Plan requirement. An amended plan is being prepared and will be provided to Council separately.
10. In terms of the Parking Demand Assessment, the key changes are (refer to the ITA for further explanation):
  - The District Plan requirement if the additional 15% walking reduction factors are applied (on the basis that the Commercial Banks Peninsula zone in Lyttleton acts in a similar capacity to a Commercial Core zone) would then be 54-58 spaces (From para. 34 of the ITA).
  - Amended Table 3 ("Estimated Demand", refer to Attachment 3) reduces estimated parking demand from 56-65 spaces to 53-61 spaces. Six spaces are provided on site, resulting in an overflow parking demand estimate of 47-55 spaces in total. This is an increase of 11- 19 spaces overflow from the previous development on the site (prior to earthquake damage) (refer to para. 38 of the ITA).
  - After the demand estimates are adjusted for 10-15% walking factor (based on District Plan and supporting Literature): the demand is estimated to be 45-55 spaces (39-48 on-street).
  - Applying the 66% peak adjustment factor (due to different activities having differences in the time of their peak parking demand: 30-36 space (para. 40) and 24-30 on-street (para. 41).
11. Noting that all of the above District Plan and demand estimates have reduced our assessment in respect of effects remains un-altered.
12. It is emphasised that against the amended rules, the estimated demand for the residential units is 17 spaces, and as six parking spaces are provided on-site, the shortfall in demand is estimated to be 11 spaces. Noting the parking space availability in Attachment 3 of the ITA, there is ample space on-street to accommodate this shortfall at all times. Accounting for proximity to the site, the most likely locations are the un-restricted parking on Oxford Street (London – Winchester), and Norwich Quay or Sumner Road. That is this demand can be met with very little displacement of existing parking demand in the area. There are no residential properties taking access from the section of Sumner Road surveyed (due to the gradients). Norwich Quay does not adjoin a residential zone. The majority of residential



properties along this section of Oxford Street have either on-site parking or a residents parking permit space on-street.

13. In respect of traffic generation, the estimates in Table 5 of the ITA have reduced from 70-79 trips in the peak hour to 69-76 (refer to Attachment 3 for the updated table). This does not affect the assessment or conclusions reached in respect of the ITA.

#### **Volunteered consent conditions**

14. It is proposed to volunteer consent conditions regarding acoustic and archaeological assessment to address the Lyttelton Port Company and Heritage New Zealand's submissions.
15. These consent conditions will include requiring that prior to the construction of the building a detailed design assessment, detailing materials used to ensure the proposal complies with the internal noise levels required by the district plan and certification of the building prior to occupation. It is also proposed to volunteer a consent condition requiring an archaeological assessment be completed by an archaeological authority prior to works beginning within the site.
16. These consent conditions are currently being revised through further consultation with Heritage New Zealand and the Lyttelton Port Company.

#### **Summary**

17. In summary, we consider that the changes made to the plans and proposed consent conditions following consultation with the Council adequately address the concerns raised by the Council and the public during the public notification of the application, and will result in a better overall design outcome.
18. We trust that the further information above assists and satisfactorily addresses the updated changes. If you require anything further, please do not hesitate to contact the undersigned.

Yours sincerely,

#### **Novo Group Limited**

Emily McDonald

Planner

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## Attachment 1: Amended District Plan Parking Requirements

Table 6: District Plan Parking Requirements Residential and Office Scenario

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

	CAR PARKS		CYCLE PARKS		LOADING	
	Residents / Visitors	Staff	Visitors	Staff	HGV	99% Car
Other residential activities, if not specified above 26 <u>20</u> units	1 space/ unit, where that unit has less than 150 m <sup>2</sup> GFA, 2 spaces/ unit otherwise	Nil	1/20 units	1 space per unit without a garage	Nil	Nil
	26 <u>20</u>	-	1.3 <u>1.0</u>	20 <u>14</u>	-	-
Food and beverage outlets 128m <sup>2</sup> PFA	9 spaces/ 100 m <sup>2</sup> PFA (2 spaces minimum)	1 space/ 100 m <sup>2</sup> PFA (2 spaces minimum)	1 space/ 300 m <sup>2</sup> PFA	1 space/ 100 m <sup>2</sup> PFA (2 spaces minimum)	1/1000m <sup>2</sup> PFA	Nil
	11.5	1.3 (2 min)	0.4	2	0.1	-
Health care facilities (massage rooms) 125m <sup>2</sup>	1 space/ 25 m <sup>2</sup> GFA	1 space/ 100 m <sup>2</sup> GFA	1 space/ 500 m <sup>2</sup> GFA	1 space/ 300 m <sup>2</sup> GFA	Nil	Nil
	5	1.3	0.3	0.4	-	-
Swimming pools (for public, or private club use) 87.5m <sup>2</sup> Pool area	1 spaces/ 10 m <sup>2</sup> pool area	1 space/ 200 m <sup>2</sup> pool area	1 spaces/ 10 m <sup>2</sup> pool area	1 space/ 500 m <sup>2</sup> pool area	1/2000m <sup>2</sup> Pool area	Nil
	8.8	0.4	8.8	0.2	Nil	-
Offices 90m <sup>2</sup> GFA	5% of staff requirement (1 space minimum)	2.5 spaces/ 100 m <sup>2</sup> GFA	5% staff (2 min)	1/150m <sup>2</sup> GFA	1/8000m <sup>2</sup> GFA	1/8000m <sup>2</sup> GFA
	0.1 (1 min)	2.3	2	0.6	0	0



Gym (Ground floor)	5 space/ 100m <sup>2</sup> GFA	1 space per 200m <sup>2</sup> PFA	1/50m <sup>2</sup> GFA	1/600m <sup>2</sup> GFA	1/8000m <sup>2</sup> GFA	Nil
248m <sup>2</sup> <del>260.34m<sup>2</sup></del> 237m <sup>2</sup> PFA	<del>12.4</del> <u>13</u>	1.2	<del>5.0</del> <u>5.2</u>	0.4	0	-
<b>Total</b>	<del>66</del> <u>58</u>	<b>7</b>	<b>18</b>	<del>24</del> <u>18</u>	<b>0</b>	<b>0</b>
<b>Reduced Total</b> 3%- 11%	<del>58-63</del> <u>52-56</u>	<b>6-7</b>	See following for calculation of Reduction Factors			

**64-70** 58-63

Table 7: District Plan Parking Requirement Accommodation and Retail Scenario

	CAR PARKS		CYCLE PARKS		LOADING	
	Residents / Visitors	Staff	Visitors	Staff	HGV	99% Car
Guest Accommodation 26 <del>20</del> units 26 beds	1 space/unit or 1 space/2.5 bedrooms, whichever is the greater	1 space/ 10 units or 1 space/ 10 bedrooms, whichever is the greater	1/20 beds	1/5 FTE staff	1/100 (beds or units)	1/50 (beds or units)
	<del>26</del> <u>20</u>	2.6	1.3	0.2	0.3	0.5
Food and beverage outlets 128m <sup>2</sup> PFA	9 spaces/ 100 m <sup>2</sup> PFA (2 spaces minimum)	1 space/ 100 m <sup>2</sup> PFA (2 spaces minimum)	1 space/ 300 m <sup>2</sup> PFA	1 space/ 100 m <sup>2</sup> PFA (2 spaces minimum)	1/1000m <sup>2</sup> PFA	Nil
	11.5	1.3 (2 min)	0.4	2	0.1	-



Other retail activities or commercial services, if not specified above 90m <sup>2</sup>	4 spaces/100 m <sup>2</sup> GLFA for the first 20,000 m <sup>2</sup> GLFA	0.5 spaces/ 100 m <sup>2</sup> GLFA	1 space/ 300 m <sup>2</sup> GLFA	1 space/ 750 m <sup>2</sup> GLFA	1/1600m <sup>2</sup> GFA	Nil
	3.6	0.5	0.3	0.1	0.1	-
Health care facilities (massage rooms) 125m <sup>2</sup>	1 space/ 25 m <sup>2</sup> GFA	1 space/ 100 m <sup>2</sup> GFA	1 space/ 500 m <sup>2</sup> GFA	1 space/ 300 m <sup>2</sup> GFA	Nil	Nil
	5	1.3	0.3	0.4	-	-
Swimming pools (for public, or private club use) 87.5m <sup>2</sup> Pool area	1 spaces/ 10 m <sup>2</sup> pool area	1 space/ 200 m <sup>2</sup> pool area	1 spaces/ 10 m <sup>2</sup> pool area	1 space/ 500 m <sup>2</sup> pool area	1/2000m <sup>2</sup> Pool area	Nil
	8.8	0.4	8.8	0.2	0	-
Gym (Ground floor) 248m <sup>2</sup> 260.34m <sup>2</sup> 237m <sup>2</sup> PFA	5 space/ 100m <sup>2</sup> GFA	1 space per 200m <sup>2</sup> PFA	1/50m <sup>2</sup> GFA	1/600m <sup>2</sup> GFA	1/8000m <sup>2</sup> GFA	Nil
	<del>12.4</del> 13	1.2	<del>5.0</del> 5.2	0.4	0	-
<b>Total</b>	<b><u>67</u> 62</b>	<b>8</b>	<b>16</b>	<b>3</b>	<b>1</b>	<b>1</b>
<b>Reduced Total</b> <b>3%- 11%</b>	<b><u>55-60</u> 60-65</b>	<b>7-8</b>	See following for calculation of Reduction Factors			

67-73 62-68



## Attachment 2: Amended Parking Demand Estimates

Table 3: Estimated Parking Demand

Tenancy	Parking Rate / Survey		Estimated Demand
<i>Basement Wellness Centre</i>	DP <sup>1</sup> (in absence of any available survey data)		16
<i>Ground floor gym / recreation 260.34m<sup>2</sup></i>	RTA Guide <sup>2</sup>	4.5 spaces /100m <sup>2</sup> GFA	11- <u>17</u>
<i>Ground floor retail or office (90m<sup>2</sup> GFA)</i>	RTA Guide (office)	1 space / 40m <sup>2</sup> GFA	2-4
	RTA Guide Specialty / Secondary Retail	4.5 spaces / 100m <sup>2</sup> GFA	
<i>Ground floor restaurant (138m<sup>2</sup> GFA, 128m<sup>2</sup> PFA)</i>	RTA Guide (restaurants)	1/3 seats or 15 spaces /100m <sup>2</sup> GFA	10
<i>Of which approx. half will be co-lab offices</i>	RTA Guide (office)	1 space / 40m <sup>2</sup> GFA	2
<i>First and Second Floor 20 Residential / Accommodation units</i>	Christchurch City Council's Motel Traffic Generation Survey 1999"	average car parking demand of 0.7 spaces per occupied unit and applying a typical occupancy rate of 81%	<del>15-22</del> <u>11-17</u>

<sup>1</sup> District Plan requirement before reduction factors applied.

<sup>2</sup> Ranges from 3 spaces per 100m<sup>2</sup> GFA to 7.5 spaces per 100m<sup>2</sup> GFA based on location. Middle rate of 4.5 spaces / 100m<sup>2</sup> GFA adopted.





RTA Guide medium<sup>3</sup> and  
High density residential flats<sup>4</sup>

0.4-1 space per unit (0.7  
adopted<sup>5</sup>) Plus 1/5 - 1/7  
visitor parking (1/6  
adopted)

**Total**

**~~56-65~~ 53-61**

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<sup>3</sup> Usually 2-20 dwellings town houses or flats

<sup>4</sup> Where more than 20 dwellings are proposed but normally 5 + story.

<sup>5</sup> Because the units fall somewhere between the medium density and high density type developments.



## Attachment 3: Amended Traffic Generation Estimates

Table 5: Estimated Peak Hour Traffic Generation

Tenancy	Traffic Generation Rate / Survey		Estimated peak hour trips
<i>Basement Wellness Centre</i>	No survey data available – assumed all anticipated 16 car park demand turn-over once in an hour		32
<i>Ground floor gym / recreation 260.34m<sup>2</sup></i>	RTA Guide	9 trips /100m <sup>2</sup> GFA	<del>22</del> <u>23</u>
<i>Ground floor retail or office (90m<sup>2</sup> GFA)</i>	RTA Guide (office)	2 trips / 100m <sup>2</sup> GFA	2-4
	RTA Guide Specialty / Secondary Retail	4.6 trips / 100m <sup>2</sup> GFA	
<i>Ground floor restaurant (138m<sup>2</sup> GFA, 128m<sup>2</sup> PFA)</i>	RTA Guide (restaurants)	5 trips /100m <sup>2</sup> GFA	3
	RTA Guide (office)	2 trips / 100m <sup>2</sup> GFA	1
<i>Of which 10 approx. half will be co-lab offices</i>			
<i>First and Second Floor 20 Residential / Accommodation units</i>	Christchurch City Council's Motel Traffic Generation Survey 1999"	average of 0.8 Trips per occupied unit and applying a typical occupancy rate of 81%	<del>8-13</del> <u>10-17</u>
	RTA Guide Medium <sup>6</sup> and High density residential flats <sup>7</sup>	0.29-0.5 trips per unit (0.4 adopted <sup>8</sup> )	

<sup>6</sup> Usually 2-20 dwellings town houses or flats

<sup>7</sup> Where more than 20 dwellings are proposed but normally 5 + story.

<sup>8</sup> Because the units fall somewhere between the medium density and high density type developments.



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**Total**

**69-76 70-79**



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## Attachment 4: Updated Plans

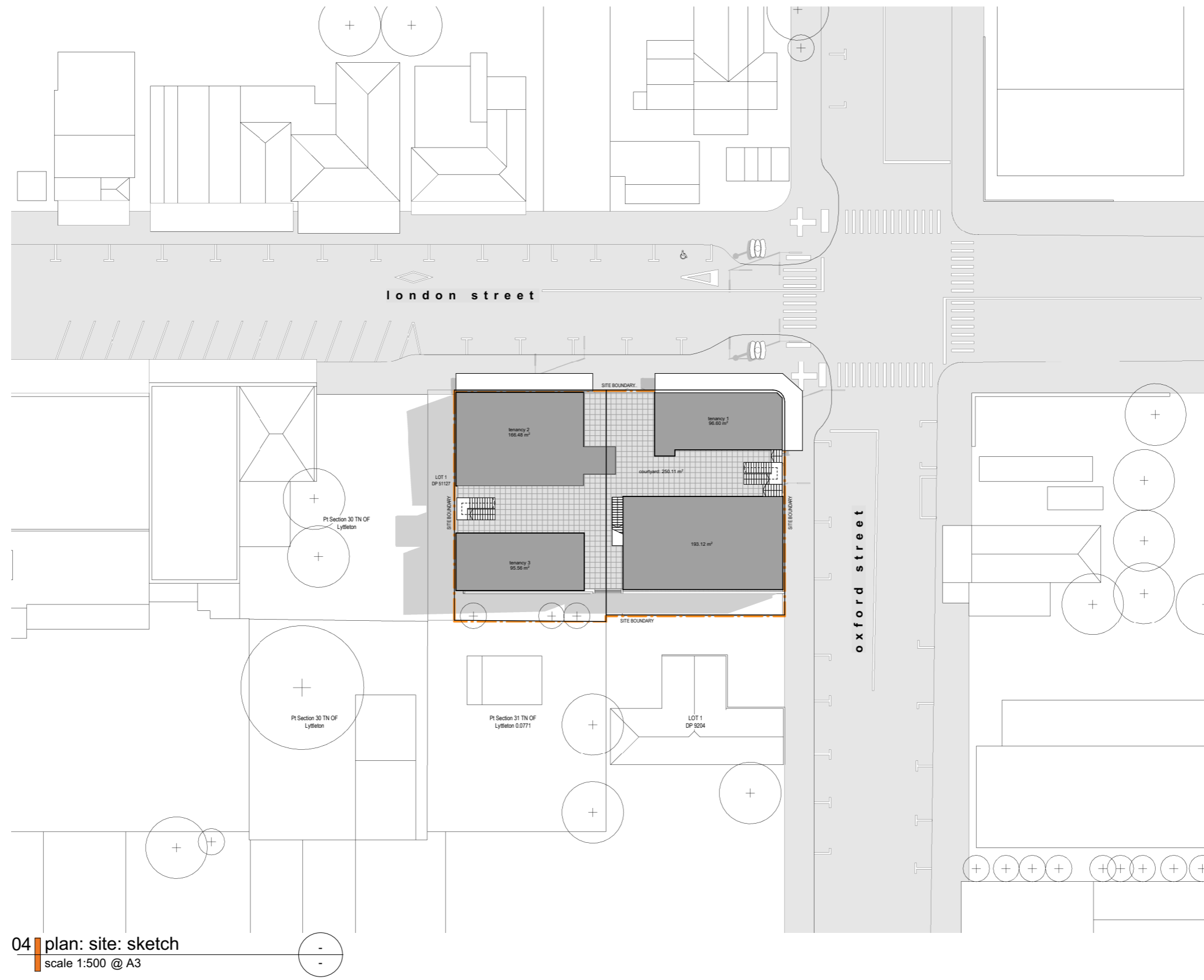
**LEGAL DESCRIPTION**  
 ADDRESS: 3, 5, 7 & 9 LONDON STREET  
 LEGAL DESCRIPTION: LOT 1, DP 13544  
 AREA: 518m<sup>2</sup>  
 & PT SECTION 31 TN OF  
 LYTTLETON  
 AREA: 455m<sup>2</sup>  
 TOTAL SITE AREA: 973m<sup>2</sup>

**SITE COVERAGE**

BASEMENT FLOOR AREA: 944m<sup>2</sup>  
 SITE COVERAGE (922m<sup>2</sup>): 97%

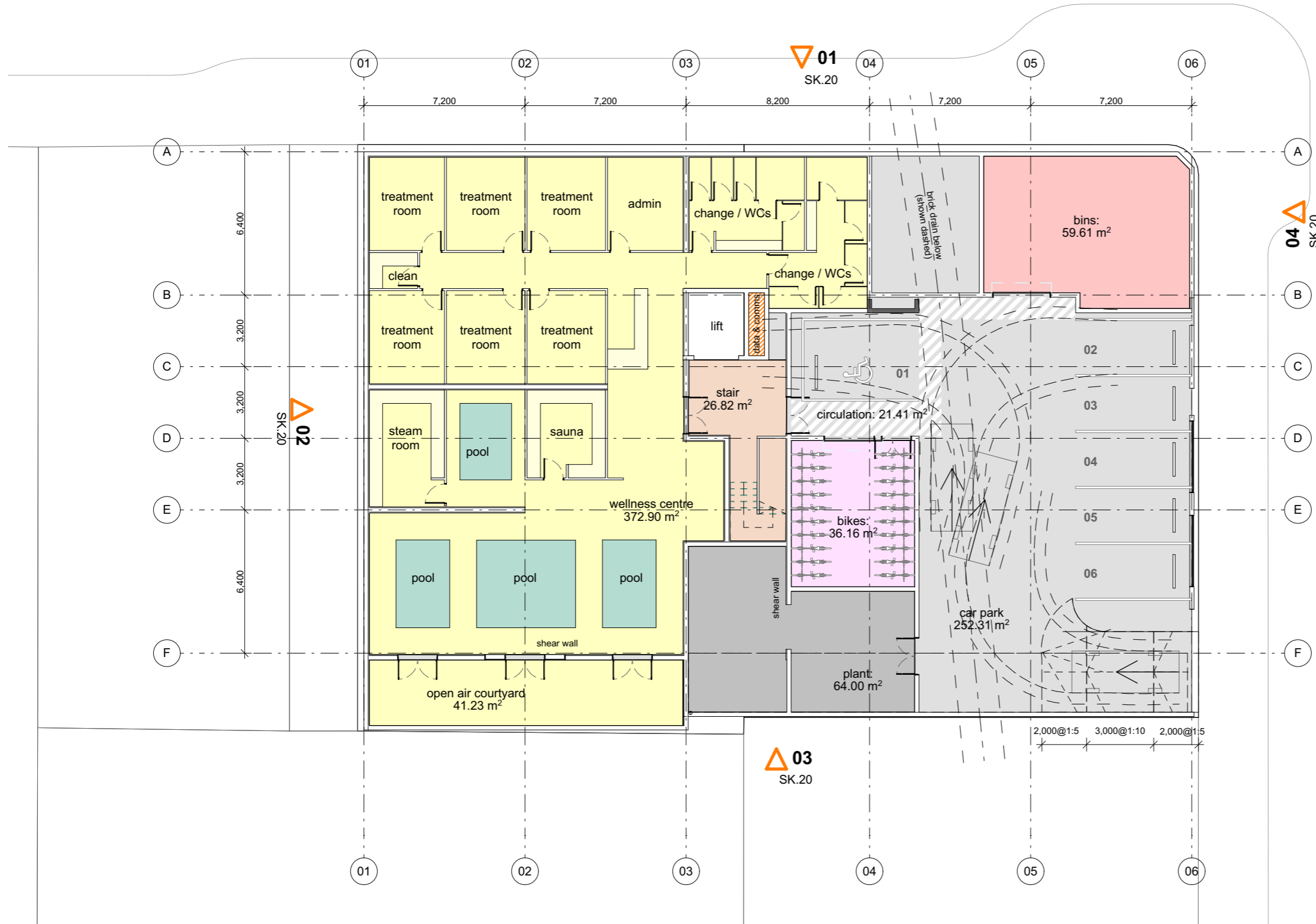
GROUND FLOOR FOOT PRINT: 551m<sup>2</sup>  
 GROUND FLOOR PUBLIC SPACE: 250m<sup>2</sup>  
 SITE COVERAGE AT GROUND FLOOR (57m<sup>2</sup>):

NOTE: GROUND FLOOR AREA DOES NOT INCLUDE STAIRS



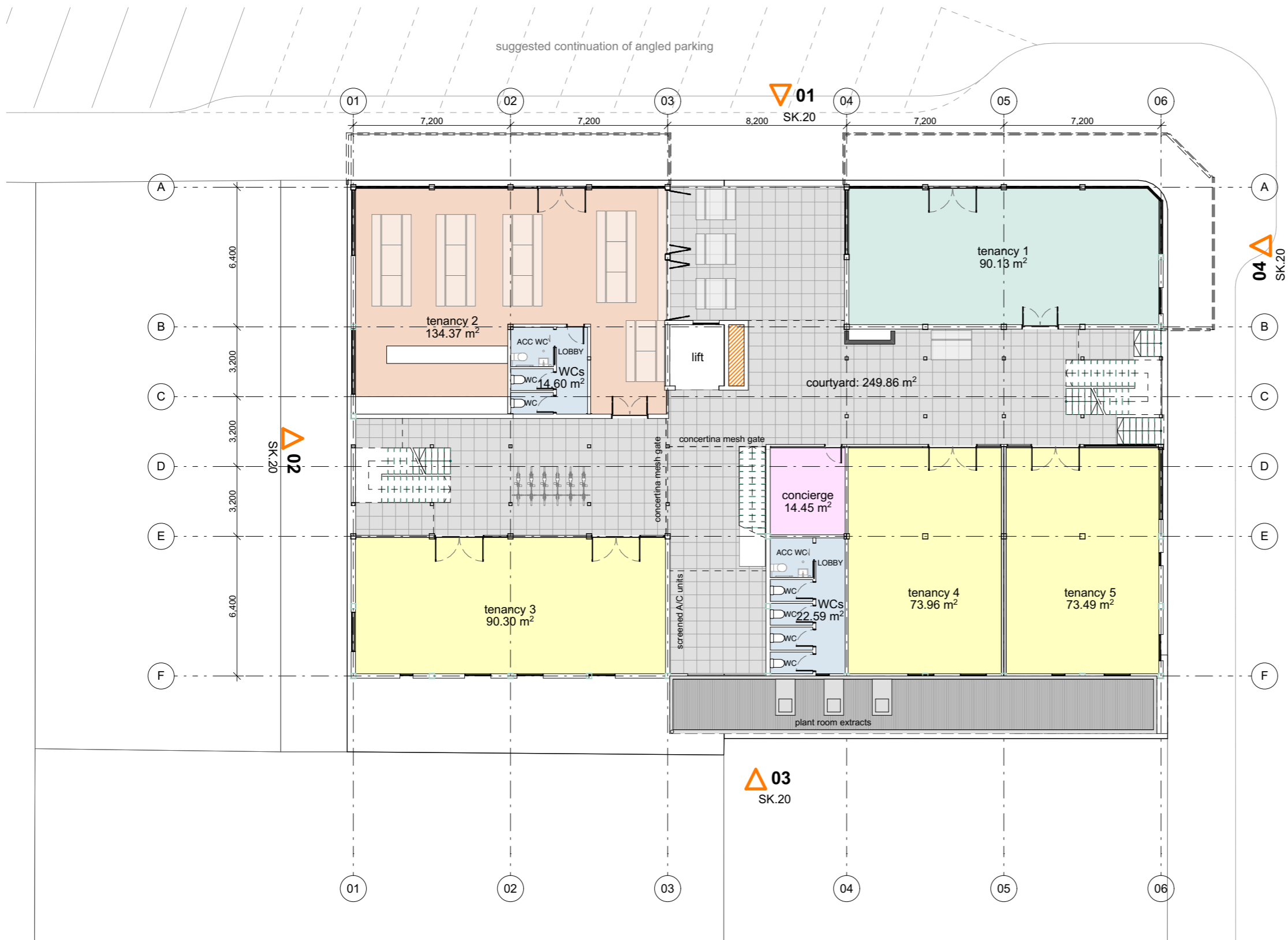
04 | plan: site: sketch  
 scale 1:500 @ A3

# l o n d o n s t r e e t



# o x f o r d s t r e e t

# l o n d o n s t r e e t



o x f o r d s t r e e t











01 north elevation  
scale 1:200 @ A3

North elevation:  
Ground floor glazing = 67% of ground floor facade



02 west elevation  
scale 1:200 @ A3

Note:  
Cladding patterns on all elevations shown indicative only

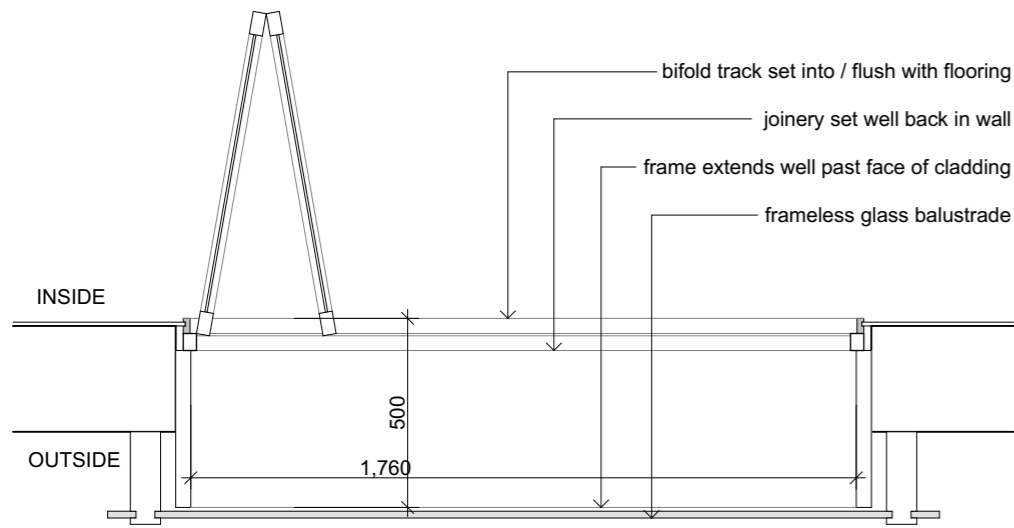


03 south elevation  
scale 1:200 @ A3

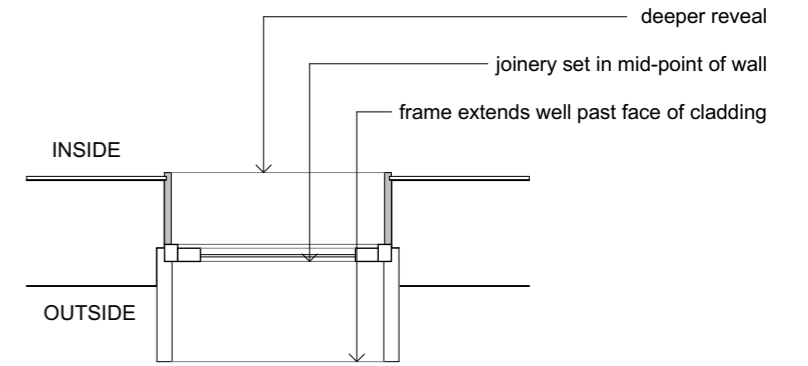
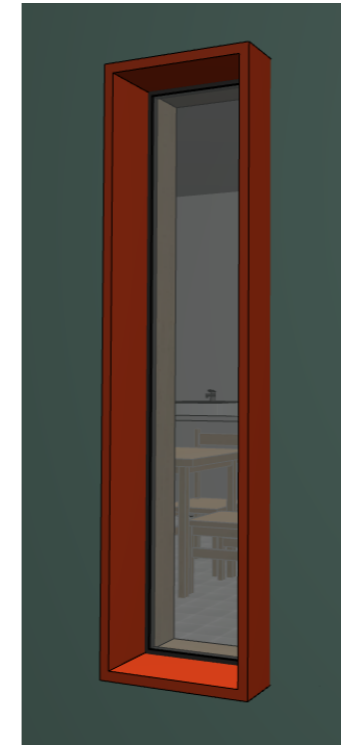


04 east elevation  
scale 1:200 @ A3

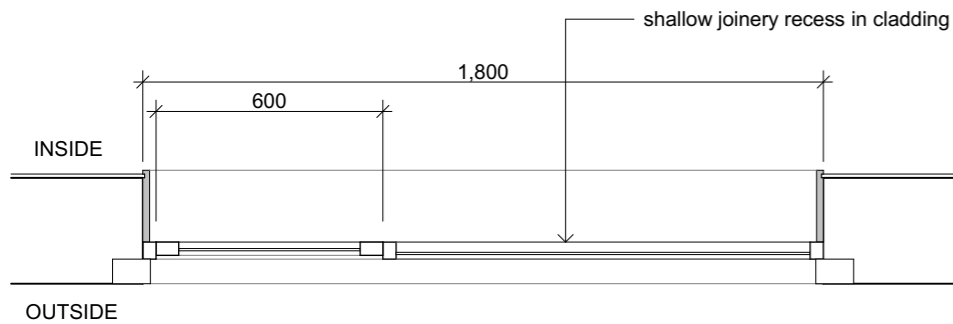
East elevation:  
Ground floor and basement glazing/openings = 37% of facade



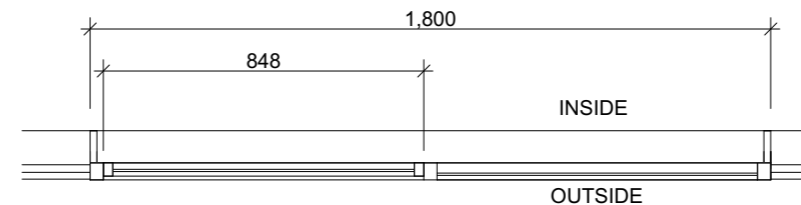
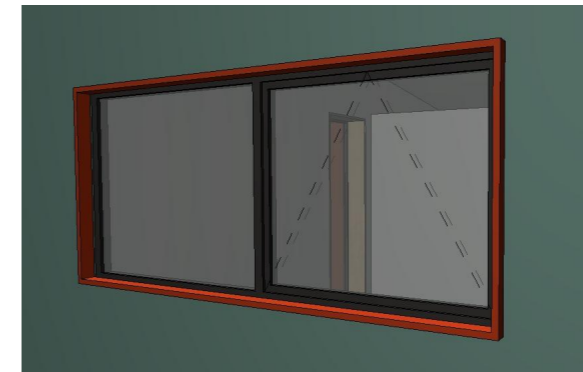
**A** juliet balcony detail  
scale 1:20 @ A3



**C** small window detail  
scale 1:20 @ A3



**B** large window detail  
scale 1:20 @ A3



**D** bedroom window detail  
scale 1:20 @ A3