

## Report on a Publicly Notified Resource Consent Application

(Section 42A)

<b>Application Reference:</b>	<b>RMA/2020/405</b>
<b>Applicant:</b>	The Youth Hub Trust
<b>Site address:</b>	109 Salisbury Street, Central City
<b>Legal Description:</b>	Lot 7 DP 536430
<b>Proposal:</b>	New building for a community facility with café, market garden, sheltered housing and residential units
<b>Zoning:</b>	Residential Central City
<b>Overlays and map notations:</b>	Central City Building Height 14m Overlay; Category 3: Lower Noise Level Area; Central City Outer Zone; and Liquefaction Management Area (LMA)
<b>Activity status:</b>	<b>Non-complying</b>
<b>Submissions:</b>	34 in support (including 1 late submission) 47 in opposition (38 of these submitters seek to be heard)
<b>Date of Hearing:</b>	29-30 September 2020
<b>Recommendation:</b>	Grant subject to conditions

### Preamble

- My full name is Shona MacMillan Jowett. I have been employed as a Planner for Christchurch City Council for approximately four years, which is the extent of my experience working in the planning and resource management field. I hold a Master of Environmental Policy from Lincoln University, and am an intermediate member of the New Zealand Planning Institute.
- This report has been prepared with advice from the Council staff detailed below. A copy of their reports has been attached in the appendices.

Officer	Position	Appendix
Ms Nicola Williams	Senior Urban Designer	Appendix 3
Ms Isobel Stout	Senior Environmental Health Officer	Appendix 4
Mr Andy Milne	Senior Transport Planner	Appendix 5

- This report reviews the application for resource consent and addresses the relevant information and issues raised. It should be emphasised that any conclusions reached or recommendations made in this report are not binding on the Commissioner. It should not be assumed that the Commissioner will reach the same conclusion or decision having considered all the evidence to be brought before them by the applicant and submitters.

### Proposed activity

4. Novo Group Limited has applied for land use consent on behalf of The Youth Hub Trust to erect buildings at 109 Salisbury Street.
  
5. The proposal is outlined in detail on pages 3-4 of the application but in brief, the main features include:
  - A residential component including:
    - supervised accommodation for 22 youth (22 x 1 bedrooms) for persons aged 10 to 25, plus two supervisor's sleeping units within the western wing of the site with shared kitchen, lounge and laundry, and youth workers living on site (in the east wing) to teach living skills and ensure behavioural standards of respect are maintained, for youth to stay for durations of between 3 and 18 months.
    - four three-bedroom residential units and one four-bedroom residential unit, and one on site manager's residential unit within the eastern wing of the site, with no live-in support, but access to daily youth worker support.
    - The Christchurch Methodist Mission will oversee the management of the housing, and rent subsidies will be available. Occupants are required to be in education or training, or looking for employment, and no alcohol or drugs will be permitted on the premises.
    - Private and communal outdoor living space, predominantly in the form of ground floor courtyards but also including roof terraces;
  - Facilities/buildings from which to deliver services including healthcare, employment, education and housing to young people between the ages of 10 – 25, including:
    - Youthline
    - Supporting Families in mental illness
    - Te Kura; 298 Youth Health - Counselling and Youth Services
    - Christchurch Methodist Mission
    - Catapult
    - Cultivate Christchurch
    - Family Works
    - The Collaborative Trust
    - Qtopia
    - Community Law
    - City Mission
    - The Youth Hub Trust
    - Nurse Maude
  - A café
  - A roof top market garden
  - Entrance from Salisbury Street for visitors and staff, and entrance from Gracefield Avenue for staff, residents and visitors
  - Car parking on site:
    - four visitor spaces accessed from Salisbury Street (including one mobility space),
    - six staff and residents spaces accessed from Gracefield Avenue (including one mobility space) between the hours of 7am to 11pm.
  - Cycle parking spaces on site:
    - 42 in the Gracefield Avenue accessed car park
    - 36 covered and 17 uncovered spaces in the Salisbury Street car park

<b>Background</b>
-------------------

6. The applicant requested that the application be publicly notified. Notification was delayed due to the Covid 19 level 4 lockdown from 26/03/2020 to 13/06/2020.

7. Council identified likely affected and concerned persons and served notice on 127 parties, and publicly notified the application on 13/06/2020. The submission period closed on 10/07/2020. A total of 81 submissions were received during this period – 34 in support (including one late submission which was accepted under section 37) and 47 in opposition. Refer to **Appendix 1** for the location of submitters in the immediate area.
8. Extensions of time were granted under section 37 of the Act for the following timeframes:
  - Double the time period between the provision of submitters' evidence and the circulation of evidence by the applicant (from 5 to 10 working days);
  - Double the time period between the circulation of the s42A Council Officer's report and the applicant's submission of evidence (from 5 to 10 working days); and
  - Extend the closing date for the submission received from MF Matheson by 3 working days.

**Description of the site and existing environment**

9. The application site is located at 109 Salisbury Street (as shown on **Figure 1** below). The site and surrounding environment is described at points 4-15 of the application. I consider that this description is accurate and it should be read in conjunction with this report.

**District Plan – Relevant rules and activity status**



Figure 1 Application site (outlined in red) and surrounding area – © 2018 GeoMedia Ltd

**Christchurch District Plan**

10. The site is zoned Residential Central City under the District Plan. This zone has been developed to contribute to Christchurch's liveable city values. Providing for a range of housing types, including attractive, high density living opportunities, the zone utilises the potential for living, working and playing in close proximity to the commercial centre of the city. The character, scale and intensity of non-residential activities is controlled in order to mitigate effects on the character and amenity of the inner city residential areas.

11. The objectives and policies for this zone generally seek a predominantly residential environment with a range of residential opportunities enabling change while contributing positively to amenity values of the area, and that non-residential activities are of a small scale and compatible with residential activities. Key objectives and policies are summarised and discussed in detail in a later section of this report (and included at **Appendix 6** to this report).
12. The proposal requires resource consent under the following rules in the District Plan:

Activity status rule	Standard not met	Reason	Matters of discretion
14.6.1.3 RD1 Any permitted activity that does not meet one or more of the built form standards in Rule 14.6.2.	Rule 14.6.2.11 Minimum site density - The minimum residential site density to be achieved when a site is developed or redeveloped with a residential unit or units shall be not less than one residential unit for every complete 200m <sup>2</sup> of site area.	Less than the 21 residential units required will be established on site (effectively 7 residential units on site)	Minimum site density from development and redevelopment of residential units – Rule 14.15.34.
	Rule 14.6.2.10 Service space - Each residential unit shall be provided with at least 3m <sup>2</sup> of indoor or outdoor service space at ground floor level for the dedicated storage of waste and recycling bins.	Each of the 3 and 4 bedroom residential units will have 2.5m <sup>2</sup> outdoor service space rather than 3m <sup>2</sup>	Service space – Rule 14.15.26.
	Rule 14.6.2.6 Tree and garden planting - A minimum of 20% of the site shall be provided for landscaping (which may include private or communal open space in residential developments), where at least 50% of the landscaping shall be trees and shrubs.	Of the minimum 20% of the site which is to be in landscaping, less than 50% of that area will be in trees and shrubs (the 20% requirement has been met).	Landscaping and tree planting – Rule 14.15.32.
	14.6.2.5 Fencing and screening - b. Other than for screening of the required area of service space or outdoor living space, fences and other screening structures shall not exceed 1 metre in height where they are located within 2 metres of the road boundary	A 2m high internal fence adjacent to a car park will be established within 2m of the Salisbury Street road frontage.	Fencing and screening – Rule 14.15.31.
	14.6.2.9 Outdoor living space - b.ii. Each private outdoor living space dimension shall be a minimum of 4m when provided at ground level and a minimum of 1.5 metres when provided by a balcony.	6 residential units in the east wing have private outdoor living spaces with minimum dimensions of 2m at ground floor level.	Outdoor living space - Rule 14.15.20.
14.6.1.3 RD2 Any activity involving the erection of new buildings that result in three or more residential units	-	The proposal will result in more than three new residential units.	Urban design in the Residential Central City Zone – Rule 14.15.33
14.6.1.5 NC1 Any non-residential activity not otherwise provided for as a permitted, restricted discretionary, discretionary or non-	-	The proposal includes a café (68.32m <sup>2</sup> gross floor area and 69.92m <sup>2</sup> outdoor courtyard), and entertainment / event spaces (741.24m <sup>2</sup> gross floor area),	-

Activity status rule	Standard not met	Reason	Matters of discretion
complying activity with a gross floor area over 40m <sup>2</sup> (including any area of outdoor storage used for that activity).		totalling 879.48m <sup>2</sup> . I note this total does not include the health care/counselling activities, referred to with regard to NC6 below.	
14.6.1.5 NC6 Any education facility or health care facility that exceeds a gross floor area of 200m <sup>2</sup> (including any area of outdoor storage).	-	The proposal includes health care facilities greater than 200m <sup>2</sup> gross floor area (Health care facility – 741.24m <sup>2</sup> )	-
8.9.2.3 RD1 Any activity listed in Rule 8.9.2.1 P1 that does not meet any one or more of the activity standards.	8.9.2.1 P1 Earthworks not for the purpose of the repair of land used for residential purposes and damaged by earthquakes. Activity standard a. Earthworks shall not exceed 20m <sup>3</sup> /site over any 12 month time period.	The proposal involves 284m <sup>3</sup> of excavation.	Rule 8.9.4
6.1.5.1.3 RD1 Any activity listed in Rule 6.1.5.1.1 P1 or P3 that exceeds the noise limits in the activity specific standards by 10 dB or less.	6.1.5.2.2 Noise limits in the Central City a. In the Central City, any activity that generates noise shall meet the Noise standards in Table 2 below at any site receiving noise from that activity, as relevant to the Category of Precinct in which the site receiving the noise is located (as shown on the Central City Entertainment and Hospitality Precinct Overlay planning map).	Vehicles utilising the Salisbury Street car park will exceed the daytime LAeq noise limit at 103 Salisbury Street by 4-8dB.	Matters of discretion - Rule 6.1.8
7.4.2.3 RD1 Any activity that does not meet any one or more of the standards in Rule 7.4.3	7.4.3.2 Minimum number of cycle parking facilities required	The layout of the cycle parks does not comply with the District Plan requirements (the cycle stands will use a wall-mounted system that will require users to lift their cycle onto the back wheel to hang the bike).	Rule 7.4.4.4 - Minimum number of cycle parking facilities.
	7.4.3.4 Manoeuvring for parking & loading Areas a. Any activity with a vehicle access, on-site manoeuvring area shall be provided in accordance with Appendix 7.5.6.	Additional manoeuvring is required to enter and exit parking spaces accessed via Gracefield Avenue.	Rule 7.4.4.6 - Manoeuvring for parking areas and loading areas
	7.4.3.7 Access design	The Gracefield Avenue access does not provide the required pedestrian visibility splay and is narrower than the required width (3.6m compared to 4.0m required).	Rule 7.4.4.10 - Vehicle access design; and Rule 7.4.4.12 - Visibility splay
	7.4.3.10 High trip generators	The proposed activity has been estimated as generating 34 to 83 vehicle movements per hour, so assessment is required against the Basic ITA matters.	Rule 7.4.4.19 - High trip generators

Activity status rule	Standard not met	Reason	Matters of discretion
	7.4.3.11 Vehicle access to sites fronting more than one street within the Central City	Access should only be taken from Salisbury Street, whereas access is also proposed from Gracefield Avenue.	Rule 7.4.4.22 - Vehicle access to sites fronting more than one street - within the Central City.

13. With regard to whether the proposed sheltered residential use can be considered as a ‘residential activity’ or ‘residential units’ under the District Plan, I have referred to the definitions in the District Plan. The eastern units are not sheltered housing and each is self-contained so I consider these to clearly meet the definition of residential activity and that each is a residential unit. The supervised accommodation for 22 youth aged 10 – 25 with two supervisors living on site I consider falls within the definition of sheltered housing, which is included in the definition of residential activity:

***Sheltered housing** means a residential unit or units used solely for the accommodation of persons for whom on-site professional emergency care, assistance or response is available, but not where residents are detained on the site.*

***Residential activity** means the use of land and/or buildings for the purpose of living accommodation and it includes sheltered housing but excludes the use of land and/or buildings for custodial and/or supervised living accommodation where the residents are detained on the site.*

With regard to whether the young people are detained on site, ‘detained’ is not defined in the District Plan but the dictionary definition is to be kept in official custody. The young people living in the supervised accommodation would be supervised but not detained.

With regard to whether the Hub residents are transitory, the applicant has stated in their application that residents may reside in the sheltered living for between 3 and 18 months, which I do not consider to be transient and therefore falling outside of the definition of guest accommodation, which means the use of land and/or buildings for transient residential accommodation offered at a tariff.

With regard to the number of residential units on the site, I consider that the sheltered housing is a residential activity and the rooms in the west wing could form one residential unit, although it accommodates 22 persons:

***Residential unit** is defined as a self-contained building or unit (or group of buildings, including accessory buildings) used for a residential activity by one or more persons who form a single household. For the purposes of this definition a building used for emergency or refuge accommodation shall be deemed to be used by a single household.*

14. Other permitted activities within the application are market gardens, community gardens, and garden allotments, provided for by rule 14.6.1.1 P5.
15. Although the application was requested to be publicly notified, I note that the following rules are subject to a non-notification clause:
- 14.6.1.3 RD1 - Any application arising from the following built form standards shall not be limited or publicly notified:
    - Rule 14.6.2.5 Fencing and screening

- Rule 14.6.2.6 Tree and garden planting
  - Rule 14.6.2.9 Outdoor living space
  - Rule 14.6.2.10 Service space
  - Rule 14.6.2.11 Minimum site density from development and redevelopment of residential units
- 14.6.1.3 RD2 - Any application arising from this rule shall not be limited or publicly notified.
  - 8.9.1 - Any application arising from non-compliance with standards in Rule 8.9.2 may be limited notified, but shall not be publicly notified
  - 7.4.2.3 RD1 for non-compliance with rules 7.4.3.7 Access design and 7.4.3.4 Manoeuvring for parking & loading - Any application arising from this rule shall not be limited or publicly notified

16. Overall the proposal must be considered as a **non-complying activity** under the District Plan.

## Submissions

17. 81 submissions were received on this application (34 in support, and 47 in opposition). One submission in support was submitted three days after the close of submissions but has been accepted by the commissioner. The list of submitters has been attached to this report as **Appendix 2**.
18. Copies of all submissions have been provided to the Commissioner.
19. Reasons for the submissions in support are summarised as follows:

The Hub will provide needed social services to youth which are:

- holistic/whole-person focussed,
- in an integrated setting,
- easily accessed,
- have considered bicultural elements including Māori kaupapa,
- reducing negative outcomes for young people (which is also a public good and asset for the local community),
- providing for people aged 17-21 who frequently fail to meet criteria for child and adult services, and there is limited availability of formal support for under 18s,
- helping youth transition to adulthood in cases where their families did not provide this,
- addressing the need for transitional accommodation for young people who are discriminated against by landlords,
- youth friendly, non-judgemental and safe residential spaces where young people can secure their own health, feel valued and receive guidance into adulthood,
- supporting young people who are forced into crime by circumstance (not career criminals), and who could have been rejected by their families before developing skills required to live alone and with people. People under 25 are adaptable and able to make positive changes when given the right support.

Co-location of youth social services with non-residential and supported residential activities (greater than 40m<sup>2</sup> of non-residential activity)

- Inclusion of other activities and amenities in the Hub makes it a place for socialising and recreation for all young people (healthy and struggling) and reduces stigma
- There are no integrated accommodation and service facilities in Christchurch, and the Hub is an opportunity to provide services, homes and support for young people in a holistic way, and supported housing with services is more beneficial than social services provided in isolation
- There are benefits to co-locating services, as it makes them more accessible and service delivery more effective and efficient. Services and accommodation are also mutually supporting

in terms of their effectiveness. Support for the approach is based on other examples of 'one-stop shops':

- The Loft; and
- The former Youth Hub on Barbadoes Street (reduced the amount of cross-referring and made it easier to get youth into services, one organisation reported youth lingering outside their location since they moved away from the hub and relationships between organisations diminished when they separated. One submission referred to research undertaken (May 2016) on the Barbadoes Youth Hub after it was disbanded, and an evaluation of it from 2012, and participants identified benefits of co-location as: opportunity for services to work together while maintaining independence; improved knowledge and provision of services; hand holding for easier access to services to address all issues; funding benefits, potential for youth to be involved in organising the Hub; addressing barriers to services (cost, embarrassment, confidentiality, appointment times, transport, knowledge of services); and fostering a sense of belonging for young people who do not have a supportive adult.)
- The café will be open to the public
- Regarding the green house, it will provide for health/wellbeing of youth through connecting with the natural environment, a therapeutic/counselling space, a focus for life skills and a training centre leading to produce being sold to locals and producing positive interactions between Hub residents and locals
- Regarding the basketball court, it will enable active lifestyles (as well as bike parking, and co-location limits transport needs)
- Other facilities benefit the local community through drama and music productions and organic produce, and opportunity for locals to support young people

#### Locating the residential component within a residential area in the central city

- The residential component makes location in a residential zone necessary, and youth social services are also best placed in a residential setting
- Positive for young and marginalised people to be part of a residential area/community, for them to be accepted, respected, connected and supported to engage in the community as active citizens, which promotes citizenship and community participation and learning social skills of being a good neighbour
- Location in a residential area normalises the facility, reduces stigma, and diminishes the perception of the Hub as an institutional facility which should not look like a clinic or hospital
- Location close to the Central City ensures easy access to a range of amenities and services within walking, cycling or scootering distance, encourages active transport and active lifestyles, central location makes buses accessible
- Diverse communities are good for the city, there has been a loss of diversity in the Central City
- Fears of large gatherings of young people and corresponding increases in noise levels, crime, graffiti, etc. proved unfounded when the Barbadoes Street Youth Hub was in operation
- Literature indicates that connection to an appropriate mix of activities and services promotes urban liveability and well-being, and what is appropriate to a residential area is an ongoing decision

#### Operation of the residential component of the Hub

- The applicant has made an effort to support community safety by ensuring that the facility has residential staff present at all times to support the safety and wellbeing of residents and visitors of the youth hub

#### Design and layout of the Hub

- The layout is appropriate as the Hub will feel enclosed and secure, yet open
- The 'village within a village' layout is intended to minimise the number of connections between the Hub and boundaries with adjoining residential sites and disturbance of neighbours while



hoping to become integrated into the wider community to benefit from intergenerational interactions

20. The reasons for the submissions in opposition are summarised as follows:

Resilience of youth services (expressed in a submission in support)

- Co-located services is best practice but does also carry elements of risk in times of emergencies were the Hub to be affected

Inappropriate model of youth social services

- Opposing the Hub model based on experience and concerned that the Hub will become a centre for crime and antisocial behaviour

Recovery of the Central City and promotion of residential activity will be compromised

- Concern for effect on vitality and success of the whole central city, affecting commercial zone recovery
- Professionals and businesses will be deterred from returning to the Central City
- The quality of the Central City environment is important to encouraging people to live there, and the Hub will dilute the sense of neighbourhood sought in the inner city. People will not move from the suburbs to the central city if they are to be located next to the Hub, and they expect a community/neighbourhood feel combined with access to amenities
- The Hub is not consistent with the outcome sought for this zone (the Plan emphasises preserving pockets of residential in the central city), and could locate in a mixed use zone instead
- The Hub will preclude residential development to the density sought in this area
- There are no more spaces to add residential use to the area but there are other places for offices and social amenities to locate, and loss of residential land makes the area more vulnerable to more non-residential activities moving in, weakening an already small and vulnerable residential area

Residential Central City as an inappropriate location

- near bars, cafes and the casino (not good for people with addictions), and the Hub should be located out in the suburbs in a more therapeutic environment with more garden space rather than the inner city
- The Hub will not have the same benefits for the local community as the Salvation Army (church) has
- Not enough explanation provided of why the Hub needs to be located in a residential area
- The residential component is not seen as residential:
  - Congregating young people (sheltered housing) next to offices is not a residential use
  - There is no limit on short term residence, and transience does not build neighbourly connections
  - The level of custodial care and their status is questioned (are they compelled to stay at the Hub? What are the supervision/custody arrangements for Hub residents?)
  - The possible age of residents suggests the Hub is not a residential activity but supervised living
- The existing intimate scale and character of the area is not a suitable location for a large scale social service complex which will detract from the appeal of the neighbourhood and are contrary to the Plan's policy framework seeking to limit scale of non-residential activities in the RCC zone, which should be compatible and focused on meeting the needs of residents
- There is more appropriate zoning for this activity
- Concern for a decrease in property values

- The Hub would not bring the usual types of neighbours that existing residents would get from standard residential units which raises concerns for the behaviour of the young people and that supervision will not adequately manage this, difficulties with managing noise and disruption from at risk young people in congregation
- The Hub is more like an institution rather than social housing, and the youths will not be engaged with the local neighbourhood or having positive interactions with existing residents which the existing residents have at present in a quiet, safe, friendly neighbourhood. The applicant/residents/staff will not contribute to this. Purchasers of the apartments at 118 Salisbury Street were attracted to the quiet residential feeling of the area, and not to an area with 10-18 year olds in a facility. Existing neighbours do not have the appropriate skills to interact with the young people (demographic disconnect between the local community) making it unlikely the two groups will connect so there will not be a benefit to the youth of being in the neighbourhood, which will have its cohesion destroyed. There is concern for the youth's problems (e.g. clients of the City Mission on Hereford Street which grew in size and altered the neighbourhood as owner occupiers left the area, there was bad behaviour which made the area feel unsafe) and the Hub changing the neighbourhood. Concern for youth's friends not caring about the neighbourhood, unemployed youths being noisy at night
- Lack of secure separation from youths will affect the security of existing residents
- Benefits to the applicant are outweighed by adverse effects on local residents
- Concern at how freedom from drugs and alcohol on the site will be ensured
- The code of conduct and security guard will change the sense of safety in the area, and submitters would like to see the code of conduct

#### Built form, appearance and overlooking

- The buildings are too large in scale and out of character, and will dominate the setting in combination with the Salvation Army and make Salisbury Street unappealing
- The Hub is a walled off enclave separated from the neighbourhood, and the youths would be within their own complex and not contributing to residential coherence, poorly integrated with the local community
- The application ought to consider signs and outdoor lighting in detail as part of the application
- Light spill across residential sites
- Privacy effects on single storey properties from overlooking from the Hub buildings including the greenhouse, overlooking into outdoor living spaces, neighbours will feel anxious, vulnerable and overlooked by residents of sheltered housing being so close and able to view into their private space. Rooftop and high level activities will make neighbours feel they are being overlooked by transient neighbours and non-residential persons which is a different effect on privacy
- Shading

#### Non-residential activities in a residential zone – residential character and amenity

- The cafe is larger than allowed, not consistent with the RCC zone, not needed and affects the character of the area
- Office and recreation facilities will damage character and residential living in the area
- Commercial activity/café should be kept in commercial zones and not allowed in prime residential areas
- The proposed youth social service facilities are not for the local community
- The majority of the site is not for residential use, non-residential activities are not expected or needed in the area (event centre, gallery, arts centre) and undermine dominance of residential activity in the RCC zone
- The proposal has been misrepresented as a singular activity but it is actually co-located activities
- The context being considered should be the nearby area rather than the wider area which includes commercial activities

- 5 Gracefield Avenue would become a thin strip of housing between two public service centres
- Cumulative effect of non-residential activity, the hub in addition to the salvation army would destroy the sense of living in a residential area
- There is a very high level of amenity and social cohesion in the area, due to lack of non-residential activity. This area is uniquely solid in residential activity (residential coherence) but also close to commercial activity in the Central City, and the Hub would undermine the strength of the community and safety of the neighbourhood. The area is attractive because of its dense residential use in comparison to other areas with non-residential activities and Airbnb's

#### Non-residential activities in a residential zone – effects on neighbours

- Noise:
  - from the number of visitors
  - from the Salvation Army events already occurring
  - from the greenhouse and basketball court (until 10pm)
  - noise effects from non-residential activities in general have not been adequately considered (stating compliance with District Plan standards is inadequate) and amenity will be affected by uncharacteristic and excessive noise for a residential setting
  - desire to live in a residential area without noise from commercial activity
  - daytime noise affecting shift workers trying to sleep during the day
  - acoustic fencing suggests noise will be a problem
  - after-hours (evening/night) activity and people disbanding after major events, making the area into a constantly vibrant commercial area
  - more noise than the Bowling Club generated
- Wide hours of operation (7am-11pm)
- Increased foot traffic

#### Earthworks

- Noise from earthworks
- Damage to property during construction (expressed in a submission in support also seeking a dilapidation report be undertaken at their property prior to and after any earthworks/construction, at the contractors cost. Past experiences left the submitter's property damaged and with repair bills)

#### Transport/traffic effects – Parking, traffic flow, access

- Not enough parking being provided on the site to accommodate parking demand from the proposed services, leading to demand for and reliance on off-site car parking spaces on the street and in nearby temporary carparks which may cease to exist
- Impacts on the road network and Gracefield Avenue
- There is existing difficulty with parking on the street during business hours due to:
  - Parked cars blocking driveways
  - Central city workers park on the street from 7-7.30am
  - Nearby new residential units on Gracefield Avenue are being advertised for potential use as accommodation (Airbnb) units with parking available on the street
- Salvation Army was appropriately denied access to Gracefield Avenue but the Hub will take access from Gracefield Avenue which is narrow and quiet and cannot sustain increased traffic. Residents are better to be monitored at the Salisbury Street entrance
- There is no footpath on the west side of Gracefield Avenue

21. Of the matters summarised above I consider some are not relevant resource management matters:

- Property values being affected, as this does not relate to matters in the relevant objectives and policies; and

- I cannot take into account unlawful activity:
  - o Unlawful car parking;
  - o Unlawful or unconsented Airbnb / guest accommodation activity; and
  - o Noise from other activities breaching District Plan noise standards or operating outside of their resource consent.

### **Actual and Potential Effects on the Environment (S.104 (1)(a))**

22. As a non-complying activity the Council's assessment of this proposal is unrestricted and all actual and potential effects must be considered. Guidance as to the effects that require consideration is contained in the relevant objectives, policies, and matters of discretion which are considered in the assessment of effects that follows.
23. I have considered the relevant issues and it is my view that they fall broadly into the following categories:
- Residential character and amenity – built form, design and visual impact
  - Residential character and amenity – scale of non-residential activity
  - Residential amenity of neighbours – overlooking, noise, glare, traffic movements
  - On-site amenity
  - Transport – parking, vehicle access, transport network
  - Earthworks and construction effects – including noise and damage to property
  - Providing for diversity of accommodation and co-located social services (positive effect)

#### **Section 104(2) – Permitted baseline**

24. Prior to undertaking an assessment of the effects of this proposal it is useful to consider discretion available under Section 104(2) of the Act (referred to as the “permitted baseline”) whereby a consent authority may disregard an adverse effect of an activity on the environment if the Plan or national environmental standard permits an activity with that effect. Case law has established that this relates to the effects of non-fanciful hypothetical activities which could be carried out as of right under the Plan. I note that the use of Section 104(2) is discretionary, however I see no reason why that discretion should not be exercised in this case.
25. Residential activity is permitted in this zone with a built form standard requiring no less than one residential unit for every 200m<sup>2</sup> and a policy seeking 50 households per hectare, so a density of residential use is sought by the District Plan although it is not permitted where resulting in three or more residential units. Non-residential and community activities may be permitted but only up to an area of 40m<sup>2</sup> (with other activity specific standards applying: only those residing on the site may be employed; and hours of operation and vehicle movements per site are limited). Those rules indicate what the Plan is seeking in this zone. Given the area of land within the site it is unlikely it could be developed for a permitted residential development (three or less residential units would not meet the minimum density).
26. I also note that there is no on-site car parking required within the Central City.

#### **Residential character and amenity – built form, design and visual impact**

27. Relevant objectives and policies seek in the Residential Central City (RCC) zone:
- An increased housing supply (14.2.1) enabling a wide range of housing types and meeting diverse needs of the community;

- To restore and enhance residential activity in the Central City by providing flexibility for a variety of housing types and needs, provide a progressive increase in the Central City residential population in support of 14.2.1.1.a.ii (achieving an average net density of at least 50 households per hectare for intensification development), and protecting amenity of inner city residential neighbourhoods (14.2.1.3);
- To enable sheltered housing to locate throughout residential areas, provided the building scale, massing and layout is compatible with the anticipated character of any surrounding residential environment (14.2.1.7);
- High quality residential environments (14.2.4);
- A predominantly residential environment offering a range of residential opportunities to support a vibrant city centre, and built development enabling change while contributing positively to amenity and cultural values of the area and to the health and safety, quality and enjoyment, for those living in the area (14.2.8); and
- Minimum standards for residential development consistent with high density living, protecting residents' amenity values, integrating development within the adjacent and wider neighbourhood, provide for a range of residential needs and recognise cultural value (14.2.8.2).

28. Of relevance to character and amenity are the drive to protect the amenity of inner city residential neighbourhoods, ensuring high quality residential environments and a range of residential opportunities to support a vibrant city centre, while enabling built development and change that contributes positively to amenity and cultural values, health and safety, and enjoyment for those living in the area. Matters of discretion, while not restrictive, are also relevant (*Rule 14.15.33 - Urban design in the Residential Central City Zone, Rule 14.15.31 - Fencing and screening, Rule 14.15.32 - Landscaping and tree planting, and Rule 14.15.34 - Minimum site density from development and redevelopment of residential units*).
29. I sought specialist input from Ms Nicola Williams, Council's Senior Urban Designer, whose full comment is attached at **Appendix 3**.
30. Ms Williams addressed the existing context and the appearance of the proposal against the urban design principles for the RCC zone (rule 14.15.33). Ms Williams also addressed matters raised by submitters with regard to overlooking from the application site, and made a number of recommendations for the applicant to consider and which they may like to respond to in their evidence prior to a hearing (opportunities to reduce glazing to reduce potential overlooking, and to demonstrate in more detail the usability of waste storage spaces). Ms Williams also recommends more detail of how entrances will be managed (hours, security etc.).
31. Ms Williams concludes that from a built form and amenity perspective the proposal could offer a captivating and contextually responsive contribution to the local neighbourhood, with landscape quality and onsite amenity being a strong feature. The massing of the buildings is balanced and human-scaled. The immediate neighbourhood would benefit from the dense-low built form resulting in maintained sunlight and sky views, an improved landscaped quality and a high quality architectural offering which can add value to the neighbourhood. Subject to addressing those recommendations Ms Williams considers the proposal will meet the outcomes and design criteria in the District Plan. Relying on Ms Williams input I consider the proposed built form will have an acceptable effect on the environment. I have relied on and accepted Ms Williams assessment and recommendations, which it is open to the applicant to respond to.

### **Residential character and amenity – scale of non-residential activity**

32. The scale of the non-residential activity is substantially greater than the permitted scale of non-residential activity (maximum gross floor area of 40m<sup>2</sup>) resulting in additional activity on the application site and in the surrounding area (noise, foot traffic, vehicle movements, loss of residential coherence). The non-residential components are:

Food and Beverage (cafe)

- Gross floor area 68.32m<sup>2</sup>
- Public area 48.95m<sup>2</sup>
- Outdoor Courtyard 69.92m<sup>2</sup>

Entertainment / Event space

- Gross floor area 741.24m<sup>2</sup>
- Public area 737.04m<sup>2</sup>

Health Care / Counselling

- Gross floor area 213.67m<sup>2</sup>
- Public Area 195.41m<sup>2</sup>

Support Services

- Gross floor area 419.33m<sup>2</sup>

33. Relevant objectives and policies for non-residential activity in the Residential Central City:
- That residential activities remain the dominant activity in residential zones while recognising the need to provide for community facilities which need to locate in residential zones and restrict other non-residential activities unless they have a strategic or operational need to locate in a residential zone (14.2.6)
  - Ensure non-residential activities do not have significant adverse effects of residential coherence, character and amenity (14.2.6.1)
  - Enable community activities and facilities within residential areas to meet community needs and encourage co-location and shared use of community facilities where practicable (14.2.6.2);
  - To restrict the establishment of non-residential activities (unless provided for under another policy under 14.2.6) especially those of a commercial or industrial nature unless the activity has a strategic or operational need to locate in a residential zone and the effects of such activities on the character and amenity of residential zones are insignificant (14.2.6.4);
  - Specifically within Central City residential areas, policy 14.2.6.8 Non-residential activities in Central City residential areas seeks to:
    - i. ensure non-residential activities are of a small scale and compatible with residential activities;
    - ii. ensure non-residential activities are focussed on meeting the needs of the local residential community or depend upon the high level of amenity inherent in the Residential Central City Zone;
    - iii. ensure new non-residential activities do not compromise the role of the Residential Central City Zone, the Central City Business Zone, or the aim of consolidating that area of the Central City or the Central City Mixed Use Zones;
    - iv. enable the on-going operation, use and redevelopment of existing fire service facilities; and,
    - v. protect residential amenity by controlling the character, scale and intensity of non-residential activities.
34. Matters of discretion, while not restrictive, are also relevant (*Rule 14.15.5 - Scale of activity* and *Rule 14.15.21 - Non-residential hours of operation*).
35. One of the non-residential activities (health care, social services) is a 'community activity' which in the District Plan means 'the use of any land and/or buildings principally by members of the community for

recreation, entertainment, health care, safety and welfare, spiritual, cultural or deliberation purposes'. The facility in this case is not only for members of the immediate community and would serve people from across the city.

36. I note that while the immediate character of the Gracefield Avenue area is intact, the character changes quickly and significantly at the intersection of Colombo and Salisbury Streets which is 100m away from the application site, so it makes sense to pay close attention to the more immediate area which could be affected.

37. I consider the impact of non-residential activity on residential character for surrounding neighbours as follows:

- The most noticeable part of the proposal for those on the east side of Gracefield Avenue contains residential buildings and the access to on-site staff car parking with the non-residential built form behind it at a distance of 20m from the street (see **Figure 2** below). The top floor of the central building is visible but I am mindful that this is the greenhouse (a permitted activity) and rooftop terrace outdoor living space for the residential activity on the site.

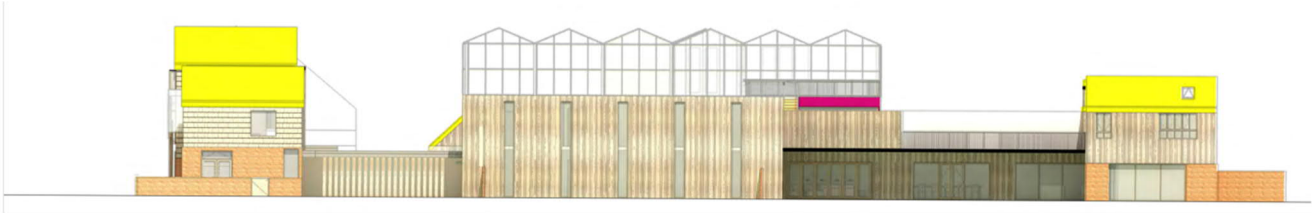


L202.1 East Elevation - Buildings only

Figure 2 East elevation facing Gracefield Avenue

- Foot traffic, drop offs and staff vehicles arriving and leaving from the Gracefield Avenue entrance would be a noticeable effect but I consider this could be comparable to the use of residential parking spaces. I add that the Salisbury Street entrance is intended to be the main entrance for visitors and staff, and the Gracefield Avenue entrance will be a secondary and more discrete and direct access to the health care centre.
- With regard to residential coherence (and the presence of residential neighbours), I consider this would be improved for owner/occupiers of 9, 35, 39, and 41 Gracefield Avenue, 3/362 and 6/362 Durham Street North and 101A and 103 Salisbury Street by adding residential units to a site which is currently occupied by a bowling lawn. As for the west internal boundary of 3-9 Gracefield Avenue, instead of a carpark they would have a café, courtyard, entry space and arts/recreation space adjoining. There is no loss of residential neighbours, but addition of a different type of non-residential activity. The café noise and activity would be unexpected in a residential context and café operational hours would be from 07:00 – 17:00 during which the applicant has stated in their application that noise and activity would be managed actively by the café management (noise is discussed in more detail below). The activity ties into the complex as a whole (using the produce from the site, acting as a training and first job opportunity, making the café space and the Hub open to the public, reducing stigma) but could affect the amenity of the neighbours at 3-9 Gracefield Avenue who have large windows and courtyards on their western sides.
- Otherwise the proposed buildings would have blank walls with narrow windows and the greenhouse would be visible to the west. I am mindful that a submission in opposition was received from only owner/occupiers of 3 Gracefield Avenue and that no submissions were received from owner/occupiers of 5 7 and 9 Gracefield Avenue, although lack of a submission is not tantamount to support for the application. I consider the scale of effect of the café on 3, 5, 7 and 9 Gracefield Avenue would be more than minor, but subject to careful management by the applicant and the café managers the effects could be acceptable. The applicant may like to elaborate on management of café effects in their evidence prior to a hearing.

- Neighbours to the north (27 and 31A Gracefield Avenue) face the youth services and greenhouse building (3.661m setback), and the north staff carpark with the rooftop terrace at first floor level 18m behind that. The youth services building has narrow windows as shown in **Figure 3** below.



L203.1 North Elevation - Buildings only

Figure 3 North elevation

- 31A Gracefield Avenue's kitchen window faces south, with a 2.6m wide landscaping area between the dwelling and the south boundary, a service area to the east and a narrow (2.05m) outdoor living space to the west (with reference to BCN/2019/819). They are oriented away from the non-residential activity but would still be aware of it. I consider the scale of the building is to be expected but not the scale of the office/health service activity, however with only narrow windows in the proposed health services building, and only staff parking adjoining that site I consider while effects would be more than minor they would be acceptable.
- 27 Gracefield Avenue is currently being redeveloped from having a carport, driveway and small outdoor courtyard adjoining the application site, into six residential units with a vehicle access and outdoor living space adjoining the application site (refer to resource consent RMA/2019/2267 and photos included in Ms Nicola Williams comment at **Appendix 3** to this report). For the same reasons as for 31A Gracefield Avenue I consider effects on the owner/occupiers of 27 Gracefield Avenue would be more than minor but acceptable.
- 35 Gracefield Avenue is diagonally adjoining the proposed health care / office building at the shared bin area at the south east corner of that site, with one small kitchen window facing south at ground floor and bathroom and storage room windows at first floor level. Windows at the south west corner are further away and face out to the sheltered housing area (referring to resource consent document RMA/2020/1152). I consider effects on the owner/occupiers of 35 Gracefield Avenue would be minor and acceptable.
- 35, 39 and 41 Gracefield Avenue face the sheltered housing on the west side of the site and their shared private outdoor living space. The roof top terrace (also outdoor living space) is set back 14m at first floor level. I consider effects would be less than minor and acceptable given the residential nature of the proposed adjoining activity.
- 3/362 and 6/362 Durham Street North face the sheltered housing and I consider their appreciation of the non-residential aspects would be low, as for 101A Salisbury Street to the south of the sheltered housing. I consider effects would be less than minor and acceptable given the residential nature of the proposed adjoining activity.
- 103 Salisbury Street, like 3-9 Gracefield Avenue, would lose a carpark and gain a different type of non-residential activity as a neighbour, but with a carpark and planting intervening:



L204.1 West Elevation - Buildings only

Figure 4 West elevation





L204.2 West Elevation - Landscape and Buildings

Figure 5 West elevation

The applicant assesses that 103 Salisbury Street currently adjoins the Bowls Club car park, and vehicle movements and non-residential use of a neighbouring site will be familiar to the residents. However the use of the bowls club carpark is not a permitted activity and there has not been a resource consent granted for this use, but if the bowls club had continued to operate on the application site it would still have this use. With regard to events on the application site and use of the carpark, the times of events have been limited to ensure the carpark is vacated to reduce the potential for disturbance of the adjoining neighbours in the 10:00pm -11:00pm period.

- From 103 Salisbury Street the west facing windows (refer to **Figures 4** and **5** above) are narrow and into an art/recreation space, otherwise there is a covered cycle parking space, visitor parking (same as there is now) and the youth hub entry space. As for 3, 5, 7 and 9 Gracefield Avenue, I consider that subject to careful management by the applicant and the effects of the non-residential activity on owner/occupiers of 103 Salisbury Street would be more than minor but acceptable.
- With regard to the neighbours to the south at 118 Salisbury Street (on the opposite side of the street), there is approximately 7m of overlapping frontage and the western most units would see the Youth Hub's south entrance, the Gracefield Avenue carriageway, the residential units at the south west corner of the Salvation Army and the main Salvation Army building, and that would be in the context of being nearer the corner of Salisbury and Colombo Streets, and adjoining the School of Tourism. In this context I consider the effects of the non-residential activity on owner/occupiers of apartments within 118 Salisbury Street would be minor and acceptable.

38. With regard to the cumulative effect of non-residential activity, in the immediate area (within 150m of the site) there is:

- Former/existing use of the application site by the Canterbury Bowling Club;
- Sheppard and Rout offices at 104 Salisbury Street (temporary accommodation granted on 24/06/2013 until 18/04/2016 but still in use, RMA/2013/1060);
- The Salvation Army (including worship hall, multiple use spaces, social services facilities, offices) at 853 Colombo Street; and
- The carpark for the New Zealand School of Tourism at 829 Colombo Street.

I cannot have regard to the Sheppard and Rout use as it is a temporary activity, and the existing use of the application site would be changing from a bowling club. The carpark for the School of Tourism is getting further away from the site, and I consider it would not noticeably contribute to or detract from the amenity of the immediate area. I consider that the proposal in combination with the nearby Salvation Army activity would have the following effect:

- Non-residential built form compounding erosion of residential amenity and coherence, although the non-residential elements are sleeved by residential activity in the proposal;
- Appearance from Gracefield Avenue of the Salvation Army is of a carpark with transparent fencing and trees, and then a two-storey non-residential building which is setback 20m from the street;
- There is no vehicle or pedestrian access to the Salvation Army from Gracefield Avenue (pedestrian and vehicle access is from Colombo Street) which to some degree removes the sense of non-residential activity further away from Gracefield Avenue, though it is entirely visible from Gracefield Avenue; and
- The eastern corner of Gracefield Avenue and Salisbury Street contains two residential units, peppering the non-residential uses with residential uses.

I consider the cumulative effect would be noticeable but acceptable given the interspersed residential activities around the non-residential activities. The area is not experiencing a wholesale conversion to non-residential activity, but – and particularly – in terms of Gracefield Avenue is seeing a strong street edge addition of residential activity and built form.

### **Residential amenity of neighbours – overlooking, noise, glare**

39. Objectives, policies and matters of discretion outlined above for the RCC are also relevant here, as well as those for noise contained in sub-chapter 6.1, which seek to manage adverse noise effects on amenity values to levels consistent with anticipated outcomes for the receiving environment (6.1.2.1), by limiting noise (6.1.2.1.1) with lower noise levels during night hours to protect sleep (6.1.2.1.2).
40. I consider the question of overlooking, which Ms Williams also addresses, relates to the amenity of neighbours (considered in more detail below in relation to non-residential activity), and that effects on neighbours from overlooking from residential buildings could be expected in the RCC zone from buildings that meet built form standards (all setbacks and the height limit has been complied with). I consider the overlooking effect of concern to submitters is amplified by the mixture of existing dwelling stock (one to two-storey) and newer developments which are consistent with anticipated RCC zone outcomes for built form. However if the applicant were to reconsider the amount of glazing to achieve greater privacy and address submitters concerns then that would be a positive outcome and would achieve the outcomes sought by the Plan (to maintain residential amenity). I consider the overlooking effects of the proposal at present may be minor but acceptable.
41. With regard to noise and glare/lighting, I sought specialist input from Ms Isobel Stout, Council's Senior Environmental Health Officer, whose full comment is attached at **Appendix 4**, and the main points from which I draw attention to as follows:
- With regard to noise from parking areas there would be a small (less than 5dBA) and occasional exceedance of the noise limits which Ms Stout is confident that in terms of effect off site is no different to noise from residential apartments and which would be largely undetectable on its own account in the context of the current traffic noise environment;
  - With regard to the café noise, Ms Stout is satisfied that daytime noise limits would be met at the boundary with residential sites. Ms Stout notes that compliance with standards does not mean the absence of noise at neighbouring properties, and standards are set at levels considered acceptable for amenity in a central city residential setting. Noise from residents is best controlled by 'house rules' and the oversight by the resident manager which has been effective in boarding house or hostel situations to ensure that nuisance noise can be promptly attended to if necessary.
  - With regard to the rooftop activities, Ms Stout would not expect the potential for noise to be any different as a result of its elevation. If anything noise rises so starting higher off the ground may make any sounds less noticeable.
  - With regard to the basketball court, the court or at least a backboard and hoop is a common feature of many residential environments. There is a potential for nuisance noise however and in this case Ms Stout expects the onsite supervision of the players would act in the same way as parents anywhere; that is to act with awareness and respect for neighbours.
  - With regard to glare, Ms Stout also provided comment on a submission referring to indoor lighting and a 'lantern effect'. Besides complying with light spill rules, Ms Stout considers the avoidance of visibility of lights to be unnecessary. I consider that lights from internal spaces are inevitable in buildings, and that the height limit has been complied with so lighting from all floors is a reasonable expectation. Also not all of the uses are likely to be in use at all hours or at night (i.e. office and greenhouse).

42. Noise and lighting can both be controlled in order to provide a suitable inner city residential environment both on site and off site. The applicant has also volunteered a condition of consent that a lighting plan be submitted to Council and certified for compliance, as the applicant has not proposed any activity where lighting is unlikely to comply (e.g. flood lighting).
43. The applicant assesses that the potential nuisance noise effects arising from the café will be managed by way of a no-seating setback in the courtyard, no music being played externally (any music within the café at background noise levels only), the managers of the café will ensure noise levels and behaviour is acceptable, noting that the café will not be open in the evenings, when the potential for nuisance effects on neighbours will be higher. Also an events management plan will be prepared (and required by condition of consent), to ensure use of the eastern central courtyard will be managed and supervised to avoid nuisance noise effects on the neighbours. Also refer to the noise mitigation measures forming part of the application at point 66 of the application, and the following are volunteered as conditions of consent:
- a. construction activities will be managed and controlled in accordance with NZS6803:1999;
  - b. standard screening for HVAC systems;
  - c. implementing an event management plan to make sure people do not congregate in courtyards during events or in the car parks after events (ensuring people leave promptly from the car parks);
- Also a Travel Management Plan will ensure that on occasions where staff arrive on site before 07:00am, they will only park in one of the three southern car parking spaces in the Gracefield Avenue.
44. I consider noise and light effects would be managed so that they are acceptable.

#### **On-site amenity (Hub residents)**

45. Objectives and policies outlined above for the RCC are also relevant here. Additional matters of discretion, while not restrictive, are also relevant (*Rule 14.15.20 - Outdoor living space*, and *Rule 14.15.26 - Service space*). I consider that for the type of housing being provided the amount and quality of outdoor living space will ensure a high level of amenity on-site, with small private courtyards for the eastern independent living units as well as a large shared courtyard, and private courtyards for the ground floor rooms in the sheltered living units (but not for the first floor) as well as a shared courtyard and rooftop terrace.

#### **Residential amenity of existing residents with regard to proposed residential use**

46. The residential component of the proposal is provided for in the zone, but many submitters from the local area had particular concerns for the type of residents that would be living at the Hub. I consider that the Plan provides for accommodation for young people and supports sheltered housing, but in the interests of addressing those submissions I draw attention to a number of aspects of the proposal:
- The proposed housing will be sheltered housing with staff to oversee and support the Hub residents. Outside normal business hours when residents only are present on site, three behavioural management staff will permanently reside on site;
  - One submission expressed concern for unemployed youths, but in order to be eligible for housing, all young people will need to be in education/training or looking for employment; and
  - All residential accommodation on the site would be subject to code of conduct requirements administered by the accommodation managers, and will have a level of oversight (on-site supervisors and managers) far exceeding that of “normal” residential development. The

potential for nuisance issues or disruption to arise from the residential activity on the site is therefore considerably less than could occur from a more typical residential complex

### **Transport – parking, vehicle access, transport network**

47. With regards to transport, relevant objectives and policies seek:
- An integrated transport system that is safe and efficient, responsive to needs, integrates with land use, reduces dependency on private motor vehicles and promotes the use of public and active transport (7.2.1)
  - That high trip generating activities manage their adverse effects on the transport system by assessing their location and design for how they are located in urban areas and generate additional vehicle trips, are accessible, do not compromise the transport system, provide patterns of development that optimise use of the existing transport system, avoid significant and mitigate other adverse transport effects on communities and amenity values, provide for mobility restricted persons, and integrate and coordinate with the transport system (7.2.1.2).
  - Provide vehicle access and manoeuvring compatible with the road classification (7.2.1.3)
  - In the central city enable activities to provide car parking spaces while minimising adverse effects on transport networks (7.2.1.4)
  - Promote public and active transport by providing cycle parking (7.2.1.6)
48. I sought specialist input from Mr Andy Milne, Council's Senior Transport Planner, whose full comment is attached at **Appendix 5**, the main points from which I draw attention to as follows:
- Some reference has been made to changes to Salisbury Street but those are in early stages and the proposal should be assessed on the basis of the existing environment.
  - With regard to cycle parking, these are proposed to be wall-mounted (not in accordance with the District Plan cycle parking requirements), Mr Milne considers that to facilitate and encourage full use of the cycle parking at least one of the wall hung cycle parking sheds should provide for a complying cycle parking layout (e.g. off Salisbury Street as the most accessible area of cycle parking), which would result in a lower total provision (75) which is still sufficient to serve the proposal.
  - With regard to the parking spaces off Gracefield Avenue, the applicant demonstrated that users of the car park can exit the site in forward gear and with visibility requirements out of the access being achieved through the design of low walls, which Mr Milne considers to be functional and operational with little impact on the safety and efficiency of Gracefield Avenue.
  - With regard to loading, on-street loading provision cannot be relied on but an alternative and suitable solution is managing the Salisbury Street car park to accommodate deliveries (make the on-site parking spaces clear early in anticipation of deliveries).
  - With regard to vehicle access design, the Gracefield Avenue access is narrower than required (3.6m compared to 4.0m required) which will only accommodate one direction of vehicle movement, which may result in a vehicle waiting for another vehicle to clear the access, but given the low number of car parks and low turn-over nature of these spaces, Mr Milne considers the probability of this to be low, and low speeds involved combine to make the level of effect on users of Gracefield Avenue low.
  - With regard to trip generation (estimated at 34 to 83 vehicle movements per hour) Mr Milne considered the applicant's estimates to be conservatively high for reasons set out in his full comment. Mr Milne had regard to the existing low parking availability in the area of the site and the focus on demand management with the Travel Plan Framework (secured as a condition of consent). Mr Milne considers the effects of the car parking supply and demand at the application site to be acceptable and potentially less than what could occur with an alternative complying residential development. The vehicle trip generation influenced by the constrained parking and Travel Plan Framework is unlikely in Mr Milne's view to have an adverse impact on the safety and efficiency of the road network.

- With regard to pedestrian access, Mr Milne is satisfied that pedestrian visitors to the site are well served by the main Salisbury Street entrance. The Gracefield Avenue entrance can be accessed relatively safely by crossing Gracefield Avenue given its local road classification and low traffic volumes.
- With regard to accessibility and traffic generation, Mr Milne considers that the sites' location, constrained parking supply and Travel Plan Framework presents the opportunity to minimise or reduce travel to and from the activity by private vehicles and to encourage public and active transport use in accordance with the District Plan.
- With regard to there being two accesses to the site, Mr Milne concurs with the assessment in the applicant's ITA (that the adverse effects of the access are acceptable given low traffic volumes on Gracefield Avenue and the low vehicle movements associated with the Gracefield access.
- From a transport perspective Mr Milne recommends the following:
  - a) In regard to the Salisbury covered, secure cycle parking structure, Cycle Park stands shall be designed in accordance with District Plan requirements;
  - b) Servicing of the site shall occur within the site and be facilitated by on-site management of the manoeuvring space such that service vehicles may enter and exit the site on forward gear;
  - c) Staff car parking shall be limited to the use of allocated persons only; and
  - d) A Travel Plan shall be provided that includes those travel management measures as listed in District Plan Table 7.5.14.1(j).

49. A Travel Management Plan is volunteered by the applicant and is to be prepared, consistent with the framework outlined in Appendix 4 of Mr Nick Fuller's (the applicant's transport specialist) report (at Appendix 7 to the application). I have relied on and accepted Mr Milne's assessment and recommendations.
50. I consider positive transport effects include encouraging active transport, accessibility of residential use and services through location close to public transport, and co-location of services to reduce transport needs.

#### **Earthworks and construction effects – noise and damage to property**

51. I note that one submitter expressed concern for construction noise and potential damage to their property. I recommend the applicant considers addressing this in their evidence prior to a hearing (e.g. a pre-works structural/condition assessment for adjoining sites, which I recommend and have drafted below). With regard to noise, the additional standards under earthworks rule 8.9.2.1 P1 will be complied with.
52. I otherwise adopt the applicant's assessment of effects of earthworks at points 75-83 of the application in which the applicant accepts a condition of consent requiring that sedimentation and dust nuisance will be controlled by an Erosion and Sediment Control Plan ('ESCP'), which will be prepared in accordance with Environment Canterbury's toolbox.

#### **Providing for diversity of accommodation and co-located social services (positive effect)**

53. The proposal would provide for sheltered housing (diversity of housing options), redeveloping a non-residential site to add residential use (albeit at the same time as adding more intensive non-residential activity of a different type).
54. The applicant has gone into more detail of the benefits of the proposal (points 47-54 and Appendix 4 of the application). The benefits of co-location appear to be supported by the submissions made in

support of the proposal, though the applicant acknowledges that examples of both the community facility/services and residential housing for youth being fully integrated are understood to be rare.

**Conclusion with respect to effects on the environment**

55. In summary, it is my opinion that with regard to surrounding neighbours, effects of the proposal would be mostly minor or more than minor but they would be acceptable subject to management of non-residential noise and activity. I consider effects on the wider environment would also be acceptable for the same reasons as I consider effects would diminish with increasing distance from the site.

**Relevant Objectives, Policies, and other Provisions of a Plan or a Proposed Plan (S.104 (1)(b))**

56. Regard must be had to the relevant objectives and policies in the Christchurch District Plan, which I have summarised and considered in turn as follows.

57. With regard to objectives and policies for the Residential Central City:

- *An increased housing supply (14.2.1) enabling a wide range of housing types and meeting diverse needs of the community* – Housing supply would be increased by the proposal and would provide for a diverse need (sheltered housing for young people);
- *To restore and enhance residential activity in the Central City by providing flexibility for a variety of housing types and needs, provide a progressive increase in the Central City residential population in support of 14.2.1.1.a.ii (achieving an average net density of at least 50 households per hectare for intensification development), and protecting amenity of inner city residential neighbourhoods (14.2.1.1, 14.2.1.3)*; - There would be in total 41 young people accommodated on the application site which would not meet the household density requirements but in terms of the number of people accommodated the proposal is comparable (the total site area developed for residential use could have 21 units and meet the minimum requirement of one unit per 200m<sup>2</sup> or 50 households per hectare), and I consider it should be read in the context of policy 14.2.1.7. The proposal would provide for a rare type of housing to meet a particular housing need, while protecting the amenity of the existing neighbourhood as far as possible through on-site support from staff and interfaces with existing sites that comply with the zone built form standards (setbacks etc.).
- *To enable sheltered housing to locate throughout residential areas, provided the building scale, massing and layout is compatible with the anticipated character of any surrounding residential environment (14.2.1.7)*; - The proposed type of residential activity (sheltered housing) is to be enabled, provided the building is compatible with the surrounding environment, and I consider it is (relying on the advice of Ms Williams). I agree with the applicant's assessment of this policy that the scale of the west wing is consistent with other medium density development in the area with generous areas of outdoor living space, but note that at three stories the more comparable residential development is that at 118 Salisbury Street, with other surrounding dwellings being two-storey. I consider the proposed scale is consistent with the zone standards and not a significant departure from the surrounding environment (three-storeys in comparison to two-storeys).
- *High quality residential environments (14.2.4, 14.2.4.1)*; - I consider the proposal would provide for a high quality residential environment, with the exception of amenity for those most affected by the non-residential activities. I adopt the applicant's assessment of policy 14.2.4.1 at page 32 of the application.
- I note the applicant has assessed policies 14.2.4.2 and 14.2.4.4 which relate to medium density residential development but I consider they are not relevant as this is high-density as sought in the Central City by policy 14.2.1.1.

- *A predominantly residential environment offering a range of residential opportunities to support a vibrant city centre, and built development enabling change while contributing positively to amenity and cultural values of the area and to the health and safety, quality and enjoyment, for those living in the area (14.2.8);* - I consider this policy should also be read in the context of policy 14.2.1.7, to protect residents' amenity while providing for sheltered housing. In terms of total area, residential use is not predominant on the site, but sufficient housing (comparable to 50 households per hectare) is provided for regardless, keeping the environment predominantly residential. The built form of the development will change the area but ensure maintained amenity for those living in the area.
- I adopt the applicant's assessment of policies 14.2.8.1 (building height) and 14.2.8.2 (amenity standards).
- *Minimum standards for residential development consistent with high density living, protecting residents' amenity values, integrating development within the adjacent and wider neighbourhood, provide for a range of residential needs and recognise cultural value (14.2.8.2);* - I consider most standards are met and where they are not adequate mitigation has been provided (i.e. outdoor living space).

58. With regard to objectives and policies for non-residential activity in the Residential Central City:

- *That residential activities remain the dominant activity in residential zones while recognising the need to provide for community facilities which need to locate in residential zones and restrict other non-residential activities unless they have a strategic or operational need to locate in a residential zone (14.2.6);* - The applicant and some submitters in support have asserted a need to locate the sheltered housing in a residential area and the benefits of co-locating it with social services. I consider this to be a benefit rather than a need, but also that it is a benefit which will improve the provision of sheltered housing which in turn will help to protect residential amenity. The applicant also considers the recreation and creative activities would build skills and meaning to life and that this is as important as training and employment. I consider the proposal is partly inconsistent with this objective particularly with regard to the café, as discussed in more detail with regard to the supporting policies. I adopt the applicant's view regarding 14.2.6.a.ii. and the relevance of 14.2.6.8 for considering non-residential activities in the Central City, as well as their view that the proposal will add to residential activity in the zone.
- *Ensure non-residential activities do not have significant adverse effects of residential coherence, character and amenity (14.2.6.1);* - I consider that there are, at worst, some more than minor adverse effects on residential amenity related to the café primarily but no significant adverse effects subject to the applicant's ability to manage non-residential activity on the site.
- *Enable community activities and facilities within residential areas to meet community needs and encourage co-location and shared use of community facilities where practicable (14.2.6.2);* - The proposal is enabling community health activities for future residents of the Hub and young people from wider Christchurch, but not exclusively for the local community. The proposal is also co-locating and sharing use of facilities so I consider the proposal is consistent with this policy. I consider that it is likely that a health care facility would provide services to people from a wider catchment than just the immediately surrounding streets, and that use of the proposed services by people outside of the immediate area does not undermine the case that the services are to meet the needs of the young people who would reside on the application site and be part of the local community.
- With regard to policy 14.2.6.3 (existing non-residential activities) I adopt the applicant's assessment at page 34 of the application.
- *Specifically within Central City residential areas, policy 14.2.6.8 Non-residential activities in Central City residential areas seeks to:*
  - *ensure non-residential activities are of a small scale and compatible with residential activities;* - I consider the proposal is strongly inconsistent with regard to the overall

scale, but the applicant and submitters assert that combining residential and social services is good for outcomes of the supported youth and that all of the proposed activities being in a residential setting is beneficial. I consider this to be a benefit but not an essential need and that the effect of the scale cannot be disregarded due to the benefits when considering the outcomes sought by the objectives and policies. The sleeving of the non-residential activity on two sides helps to mitigate the scale of the activity, but the frontage to Salisbury Street is still indicative of the large scale of non-residential activity.

- ii. *ensure non-residential activities are focussed on meeting the needs of the local residential community or depend upon the high level of amenity inherent in the Residential Central City Zone;* - The proposed non-residential activities would serve the residents of the Hub but are not exclusively focussed on the immediately local community and could be accessed by youth from a wider area and in this sense the proposal is inconsistent, however it could serve the local youth community at the same time. However I adopt the applicant's assessment that the Hub does depend on the high level of residential amenity in the zone (page 35 of the application).
- iii. *ensure new non-residential activities do not compromise the role of the Residential Central City Zone, the Central City Business Zone, or the aim of consolidating that area of the Central City or the Central City Mixed Use Zones;* - The proposal would still result in housing being provided on the site within the RCC zone, so I consider the role of that zone is not compromised by the proposal. I adopt the applicant's assessment of this clause with regard to not undermining the Central City Business (CCB) Zone (page 35 of the application) but only with regard to the health facility aspects of the proposal and not the café, although I consider the café is of such a small scale that the CCB zone would not be undermined by it.
- iv. *enable the on-going operation, use and redevelopment of existing fire service facilities;*  
- n/a
- v. *protect residential amenity by controlling the character, scale and intensity of non-residential activities;* - Referring back to the assessment of effects, I consider a small number of residents will be affected to a more than minor degree, and in that sense the proposal is inconsistent with this policy. I note the sleeving of non-residential activities which presents a residential interface to the east and west, but this does not occur at the south side and on Salisbury Street, where I have identified the most affected persons to be.

59. With regards to transport, relevant objectives and policies seek:

- An integrated transport system that is safe and efficient, responsive to needs, integrates with land use, reduces dependency on private motor vehicles and promotes the use of public and active transport (7.2.1)
- That high trip generating activities manage their adverse effects on the transport system by assessing their location and design for how they are permitted by the zone, are located in urban areas and generate additional vehicle trips, are accessible, do not compromise the transport system, provide patterns of development that optimise use of the existing transport system, avoid significant and mitigate other adverse transport effects on communities and amenity values, provide for mobility restricted persons, and integrate and coordinate with the transport system (7.2.1.2).
- Provide vehicle access and manoeuvring compatible with the road classification (7.2.1.3)
- In the central city enable activities to provide car parking spaces while minimising adverse effects on transport networks (7.2.1.4)
- Promote public and active transport by providing cycle parking (7.2.1.6)

60. Relying on Mr Milne's assessment, I consider effects on transport are acceptable, trip generation of the activity would be managed, access and manoeuvring is compatible with the adjoining roads, parking is provided while effects are minimised, and public and active transport are encouraged.

61. With regards to Noise, relevant objectives and policies seek to manage adverse noise effects on amenity values to levels consistent with anticipated outcomes for the receiving environment. I consider the noise levels would be consistent with the residential environment. However the nature of the noise



from non-residential activities will be unexpected. The applicant proposes to manage this through the café operation, a code of conduct and a transport management plan. I suggest the applicant could address the proposed management in more detail in their evidence as it is an area of concern for many submitters. If the noise levels can be managed so that they are similar to a quiet café and office environment I consider that they would be acceptable and compatible.

62. With regard to earthworks, I adopt the applicant's assessment of objectives and policies under sub-chapter 8.2 (at page 30 of the application) and agree that the proposal is consistent.

### **Conclusion on objectives and policies**

63. Much of the applicant's case for co-location is to enhance the effectiveness of each component of the proposal, a residential environment being best for the young residents of the Hub, while a Central City location makes other amenities more accessible, and having youth living on the same site as the social services enhances their effectiveness and outcomes for the young people living there. Sheltered housing is to be enabled, and the other activities are to support the sheltered housing.
64. One submitter asserts that this is co-location of different independent activities that do not need to be located on the same site. I agree with this to an extent particularly in light of objective 14.2.6 and policy 14.2.6.8. However I am having regard to the benefits of co-location in the context of providing for a diversity of housing, and doing so successfully as sheltered housing for a particular demographic. The applicant has put forward a case for the importance of youth being part of a residential community, and that a sense of community and connection, being a valued and responsible part of a community, cannot be achieved in a commercial or industrial area, where youth are separated from residential communities. Following on from that, the applicant considers the success of the development is equally dependent on the provision of the wrap around support services on the same site. The proposal is a particularly residentially focussed non-residential activity. While the services might not be focused on the existing residents of the community, they will be focused on the residents of the Hub itself (a residential activity provided for in the Plan).
65. With regard to the café, the applicant may like to elaborate on how and whether the inclusion of the café enhances the provision of the residential and health care / social services aspects of the proposal apart from providing work experience to Hub residents.
66. I consider the amenity effects of the non-residential activities can be mitigated sufficiently, and would be acceptable subject to careful management of activities by the applicant.
67. After considering the relevant objectives and policies it is my conclusion that in an overall sense, the application is acceptable and consistent with the outcomes sought by the Plan to provide for sheltered housing and community facilities, while protecting residential amenity.

### **Non-complying Activity Threshold Test (S.104D)**

68. Under Sections 104B and 104D, when considering an application for resource consent for a non-complying activity, a consent authority may grant or refuse the resource consent, and (if granted) may impose conditions under section 108.
69. Under Section 104D, and despite any decision made for the purpose of Section 95A in relation to minor effects, a consent authority may grant a resource consent for a non-complying activity only if it is satisfied that either the adverse effects of the activity on the environment will be minor, or that the application is for an activity that will not be contrary to the objectives and policies of the plan.

70. Even where one of the threshold tests in Section 104D is met, the consent authority still retains an overall discretion as to whether to grant the application. That discretion is to be exercised having regard to the criteria set out in Section 104.
71. I consider the proposal will have more than minor adverse effects but that it will not be contrary to objectives and policies, so consent may be granted.

#### **Other relevant Statutory Documents (S.104 (1)(b))**

72. The District Plan has been recently reviewed and gives effect to the higher order planning documents. As such, there is no need to address them specifically in this report.

#### **Relevant Other Matters (S.104 (1)(c))**

##### **Recovery Plans and Regeneration Plans**

73. Section 60(2) of the Greater Christchurch Regeneration Act 2016 requires that decisions and recommendation on resource consent applications are not inconsistent with Recovery Plans and Regeneration Plans.
74. There is the Christchurch Central Recovery Plan, but this has been incorporated into the District Plan and the proposal will not frustrate the development of any anchor projects or precincts.

##### **Precedent effect/Plan integrity**

75. Given the non-complying status of this application it is appropriate to have regard to the issue of precedent, as well as the effect of granting consent upon the integrity of the District Plan and public confidence in its consistent administration. Case Law has established however, through the High Court in *Rodney District Council v Gould*, that concerns relating to plan integrity and precedent effect are not mandatory considerations. The Court held that they are matters that decision makers *may have regard to*, depending on the facts of a particular case including:
1. Whether a proposal is contrary to the objectives and policies of the plan; and if so
  2. Whether in the circumstances of a particular case a proposal can be seen as having some unusual quality.

In this case the proposal is not contrary to the objectives and policies, therefore I am satisfied that issues of precedent or plan integrity do not arise.

#### **Part 2 of the Act**

76. The matters outlined previously are subject to Part 2 of the Act which outlines its purpose and principles.
77. The use, development and protection of resources is to be sustainably managed in a way that enables people and communities to provide for their social, economic and cultural wellbeing and their health and safety, while avoiding, remedying or mitigating any adverse effects of activities on the environment.

78. The Christchurch District Plan has recently been reviewed. Its provisions were prepared under the higher order planning documents and, through its preparation and the process of becoming operative, have been assessed against the matters contained within Part 2.
79. Taking guidance from recent case law<sup>1</sup>, the District Plan is considered to be the mechanism by which the purpose and principles of the Act are given effect to in the Christchurch District. It was competently prepared via an independent hearing and decision-making process in a manner that appropriately reflects the provisions of Part 2. Accordingly, no further assessment against Part 2 is considered necessary.

## Conclusion

80. After considering the actual and potential effects on the environment of allowing the application, it is my conclusion that there would be some more than minor adverse effects on residential amenity for some neighbours of the application site but that those effects are not significant and are acceptable, subject to the applicant's management of adverse effects and conditions of consent (drafted below).
81. In my opinion this proposal is mostly consistent with the objectives and policies of the District Plan, with some inconsistency due to the inclusion of the proposed cafe.
82. I therefore consider that the proposal satisfies the threshold test of Section 104D. In this respect I consider Council has a discretion to exercise as to whether or not to grant consent.
83. I consider that the proposal supports Part 2 of the Resource Management Act 1991, and that it is not inconsistent with the Christchurch Central Recovery Plan.
84. Having considered all of the relevant matters under Sections 104, 104B and 104D, it is my opinion that consent should be granted subject to conditions.

## Recommendation

85. I have assessed this application for the Youth Hub at 109 Salisbury Street. Having considered all the matters relevant to this application, I recommend that this application be **granted** pursuant to Sections 104, 104B, 104D and 108 of the Resource Management Act 1991 subject to the following conditions:
1. Except where varied by the conditions of this consent the development shall proceed in accordance with the information and plans submitted with the application.
  2. A lighting plan shall be submitted to Council ([rcmon@ccc.govt.nz](mailto:rcmon@ccc.govt.nz)) for acceptance.
  3. A Travel Management Plan shall be prepared, consistent with the framework outlined within Appendix 7 of the application, and submitted to Council ([rcmon@ccc.govt.nz](mailto:rcmon@ccc.govt.nz)) for acceptance.
  4. An event management plan shall be prepared and submitted to Council ([rcmon@ccc.govt.nz](mailto:rcmon@ccc.govt.nz)) for acceptance.
  5. The consent holder shall prepare a pre-works structural/condition assessment for adjoining sites.

---

<sup>1</sup> *R J Davidson Family Trust v Marlborough District Council* [2018] NZCA 316

6. All filling and excavation work shall be carried out in accordance with a site specific Erosion and Sediment Control Plan (ESCP), prepared by a suitably qualified and experienced professional, which follows the best practice principles, techniques, inspections and monitoring for erosion and sediment control contained in ECan's Erosion and Sediment Control Toolbox for Canterbury <http://escscanterbury.co.nz/>. The ESCP must be held on site at all times and made available to Council on request.
7. Run-off shall be controlled to prevent muddy water flowing, or earth slipping, onto neighbouring properties, legal road, or into a river, stream, drain or wetland. Sediment, earth or debris shall not fall or collect on land beyond the site or enter the Council's stormwater system. All muddy water must be treated, using at a minimum the erosion and sediment control measures detailed in the site specific Erosion and Sediment Control Plan, prior to discharge to the Council's stormwater system.
8. The ESCP shall be implemented on site and maintained over the construction phase, until the site is stabilised (i.e. no longer producing dust or water-borne sediment). The ESCP shall be improved if initial and/or standard measures are inadequate. All disturbed surfaces shall be adequately topsoiled **and** vegetated as soon as possible to limit sediment mobilisation.
9. Dust emissions shall be appropriately managed within the boundary of the property in compliance with the *Regional Air Plan*. Dust mitigation measures such as water carts or sprinklers shall be used on any exposed areas. The roads to and from the site, and entrance and exit, must remain tidy and free of dust and dirt at all times.
10. The consent holder must notify Christchurch City Council no less than three working days prior to works commencing, (email to [rcmon@ccc.govt.nz](mailto:rcmon@ccc.govt.nz)) of the earthworks start date and the name and contact details of the site supervisor.
11. All loading and unloading of trucks with excavation or fill material shall be carried out within the subject site.
12. The proposed landscaping shall be established on site within the first planting season (extending from 1 April to 30 September) following the final, passed building inspection.
13. All landscaping required for this consent shall be maintained. Any dead, diseased, or damaged landscaping shall be replaced by the consent holder within the following planting season (extending from 1 April to 30 September) with trees/shrubs of similar species.

**Advice notes:**

i) *Monitoring*

The Council will require payment of its administrative charges in relation to monitoring of conditions, as authorised by the provisions of section 36 of the Resource Management Act 1991. The current monitoring charges are:

- (a) A monitoring programme administration fee of \$102.00 to cover the cost of setting up the monitoring programme; and
- (b) A monitoring fee of \$175.50 for the first monitoring inspection to ensure compliance with the conditions of this consent; and
- (c) Time charged at an hourly rate if more than one inspection, or additional monitoring activities (including those relating to non-compliance with conditions), are required.

The monitoring programme administration fee and inspection fees will be charged to the applicant with the consent processing costs. Any additional monitoring time will be invoiced to the consent holder when the monitoring is carried out, at the hourly rate specified in the applicable Annual Plan Schedule of Fees and Charges.

- ii) This site may be an archaeological site as defined and protected under the provisions of the Heritage New Zealand Pouhere Taonga Act 2014. Archaeological sites are defined in the HNZPTA as any place in New Zealand where there is physical evidence of pre-1900 occupation, regardless whether the site is known or not, recorded in the NZAA Site Recording Scheme or not, or listed with Heritage New Zealand or the local council. Authority from Heritage New Zealand is required for any work that affects or may affect an archaeological site. **Please contact the Heritage New Zealand regional archaeologist on 03 363 1880 or [archaeologistcw@heritage.org.nz](mailto:archaeologistcw@heritage.org.nz) before commencing work on the land.**

### **Development Contributions Assessment**

This proposal has been assessed for development contributions (DCs) under the provisions of the [Christchurch City Council Development Contributions Policy](#) (DCP). The proposal has been found to create additional demand on network and community infrastructure or reserves.

To help fund community facilities, the Local Government Act 2002 (LGA) allows a council to require development contributions if the effect of a development requires the council to provide new or upgraded infrastructure.

This Notice informs you of the DCs required by the Council for the development but is not a request for payment. An invoice will be issued by the Council when it requires payment of the DC's. Payment will be required before issue of a code compliance certificate for a building consent, commencement of the resource consent activity, issue of a section 224(c) certificate for a subdivision consent or authorisation of a service connection, whichever is first. An invoice can be issued earlier at your request. Council may also issue an invoice, at its discretion, if it considers the development is already utilising Council infrastructure for which DCs are being required.

### **Development contribution assessment summary**

DEVELOPMENT CONTRIBUTIONS SUMMARY			PIM or Consent Ref:		RMA/2020/405			
Customer Name	The Youth Hub Trust (Te Hurihanga o Rangatahi)		<b>ASSESSMENT</b>					
Project Address	109 Salisbury Street							
Assessment Date	23/06/2020							
<b>Assessment Summary</b>								
		HUE Credits						
		Current	Assessed	Discounts	Assessed HUE After Discount	Change	DC Rate (incl GST)	DC Charge (incl GST)
<b>Activity</b>	<b>Catchment</b>	<b>HUE A</b>	<b>HUE B</b>	<b>C</b>	<b>HUE D</b>	<b>HUE E</b>	<b>G</b>	<b>F= Ex G</b>
<b>Network Infrastructure</b>								
Water supply	District-wide	8.40	17.49	0.0%	17.49	9.09	\$2,395.45	\$21,771.94
Wastewater collection	District-wide	7.45	17.08	0.0%	17.08	9.63	\$6,349.15	\$61,122.11
Wastewater treatment and disposal	District-wide	7.45	16.15	0.0%	16.15	8.70	\$2,904.90	\$25,274.44
Stormwater & flood protection	Avon	7.77	12.12	0.0%	12.12	4.35	\$798.10	\$3,472.53
Road network	Central City	2.84	20.15	0.0%	20.15	17.31	\$907.35	\$15,709.94
Active travel	District-wide	2.84	20.15	0.0%	20.15	17.31	\$425.50	\$7,367.14
Public transport	District-wide	2.84	20.15	0.0%	20.15	17.31	\$717.60	\$12,424.59
<b>Total Community and Network Infrastructure</b>								\$147,142.69
<b>Reserves</b>								
Regional parks	District-wide	1.00	5.60			4.60		\$12,399.76
Garden and heritage parks	District-wide	1.00	5.60			4.60		\$740.60
Sports parks	District-wide	1.00	5.60			4.60		\$11,638.00
Neighbourhood parks	Central City	1.00	5.60			4.60		\$8,167.76
<b>Total Reserve Contributions</b>								\$32,946.12
<b>GST 15%</b>								\$23,489.84
<b>Total Development Contribution</b>								<b>\$180,088.81</b>

Where both a resource consent and building consent are required as part of the same development, a development contribution (DC) assessment will be undertaken for both consents. However the applicant need only pay for one assessment. As a result, the Council will only invoice in accordance with either the assessment on the resource consent or the assessment on the building consent, whichever is the lower of the two (after any corrections or reassessments undertaken in accordance with the DCP).

The DC assessment is valid for 24 months from the date the assessment is issued (usually with the consent). If the original assessment expires before payment is made, reassessment of the DCs required will be carried out at the same time the invoice is generated.

Reassessments will incorporate any increases to the development contribution requirement in line with the Producers Price Index (PPI) as described in Parts 2.9 and A.7.3 of the DCP. PPI adjustments will incorporate all years between the original application and the time the reassessment is carried out.

#### Reconsiderations and objections

Under section 199A of the Local Government Act 2002 you can request that the Council reconsider the required DC on the following grounds:

- the development contribution was incorrectly calculated or assessed under the DCP; or
- the Council incorrectly applied its DCP; or
- the information used to assess your development against the DCP, or the way the Council has recorded or used it when requiring a development contribution, was incomplete or contained errors.

A Request for Reconsideration form must be lodged with Council within 10 working days of receiving this DC Notice.

Under section 199C of the Local Government Act 2002 you can object to the assessed DC requirement on the following grounds:

- the development contribution was incorrectly calculated or assessed under the DCP; or
- the territorial authority incorrectly applied its DCP; or
- the information used to assess your development against the DCP, or the way the territorial authority has recorded or used it when requiring a development contribution, was incomplete or contained errors.

An Objection to DCs form must be lodged with the Council within 15 working days of receiving this DC Notice or a reconsidered assessment. A deposit of \$1,000.00 will be required to lodge an objection.

A form to request a reconsideration or lodge an objection can be found on our website.

To request an invoice please contact a Development Contributions Assessor by phone on (03) 941-8999 or email [developmentcontributions@ccc.govt.nz](mailto:developmentcontributions@ccc.govt.nz). Once an invoice has been issued payment is required within 30 days. Please quote the project number with all correspondence.

Further information regarding development contributions can be found on our website [www.ccc.govt.nz](http://www.ccc.govt.nz) or by contacting a Development Contributions Assessor on (03) 941-8999.



Shona Jowett  
Planner Level 3

**Reviewed by:**

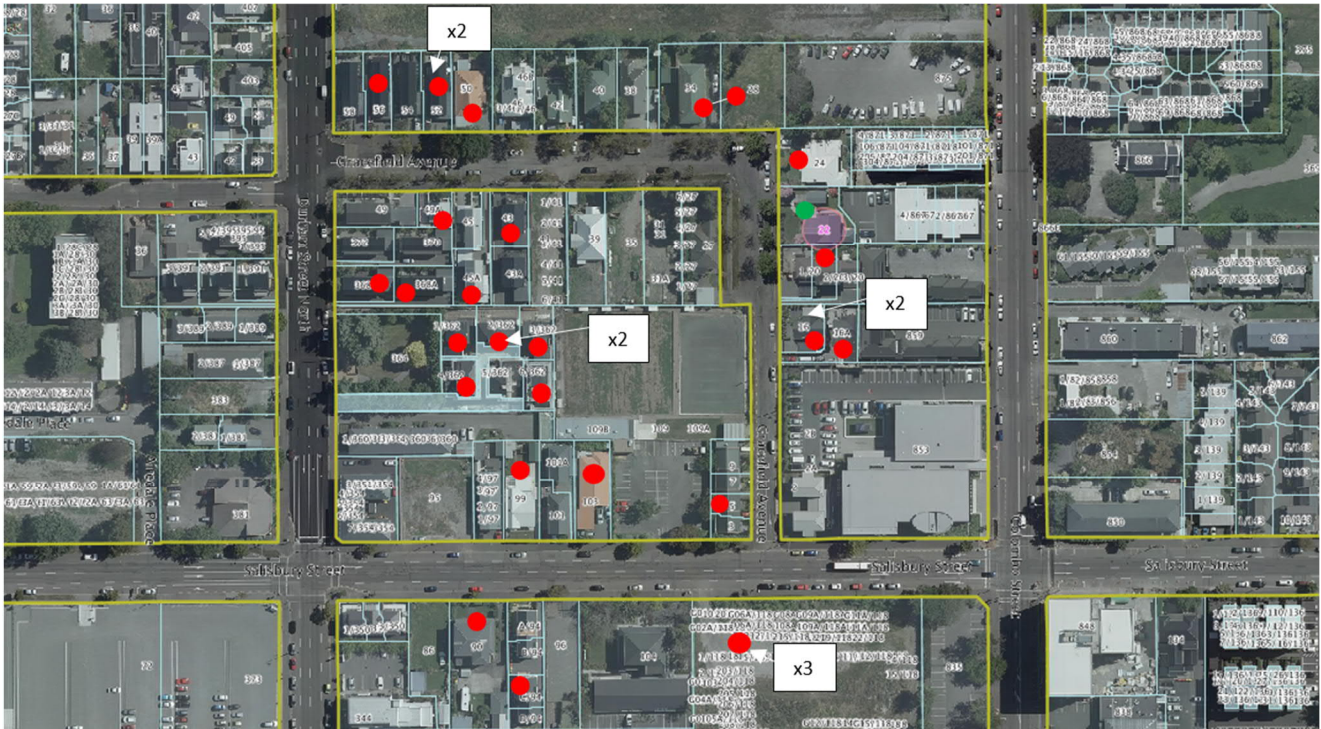
Sean Ward

**PRINCIPAL ADVISOR RESOURCE CONSENTS**

24/08/2020



**Appendix 1 – Location of submitters in the immediately surrounding area (red indicates opposition, green indicates support)**



**Appendix 2 – List of submitters**

<b>NAME</b>	<b>POSTAL ADDRESS</b>	<b>TOWN</b>	<b>TITLE</b>	<b>Oppose/Support</b>	<b>Wish to be heard</b>	<b>Joint Sub</b>	<b>Address for service</b>
J Keightley & G Ridley	43 Conference Street Christchurch Central	Christchurch 8013	Jenny/Geoff	<b>Support</b>	No	Yes	Email
D Sekone-Fraser	58 Grahams Road Burnside	Christchurch 8041	Douglas	Support	No		Email
F Todd	C/- CAF Community & Outreach Team The Princess Margaret Hospital Cashmere Road	Christchurch 8022	Fraser	Support	No		Email
A Hey	28 Otago Street Ilam	Christchurch 8053	Andrew	Support	No		Email
S McInroe	243 Hills Road Mairehau	Christchurch 8013	Shane	Support	No	Yes	Email
J Zintl - Ara Taiohi	PO Box 6886 Marion Square	Wellington 6141	Jane	Support	Yes		Email
Dr A Thomas	36 Kinghorne Street Strathmore Park	Wellington 6022	Amanda	Support	Yes		Email
R Edmundson - Linwood College at Otakaro	180 Avonside Drive Avonside	Christchurch 8061	Richard	Support	Yes		Email
C J Yusaf	44 Bealey Avenue Christchurch Central	Christchurch 8013	Cheryl	Support	No		Email
A McDonald	35 Mansfield Avenue St Albans	Christchurch 8014	Alison	Support	No		Email
Ria Schroder The Collaborative Trust for Research and Training in Youth Health and Development	PO Box 2986	Christchurch 8140	Ria	Support	Yes	Yes	Email
Dr M Ditchburn - 298 Youth Health Centre	1/25 Churchill Street Christchurch Central	Christchurch 8013	Marie	Support	Yes	Yes	Email
Youthtown - South Island	C/- R Chambers PO Box 24348 City East	Christchurch 8141	Richard	Support	No	Yes	Email

J D Lyng	4/284 Manchester Street Christchurch Central	Christchurch 8013	Jeffrey	Support	No		Email
M Andrews	38 Norwich Street Linwood	Christchurch 8062	Maree	Support	Yes		Email
L & P Stenning D Lucas	5/284 Manchester Street Christchurch Central	Christchurch 8013	Lynette/ Phillip/Di	Support	Yes		Email
O Bhattacharya - Generation Zero	8 Milnebank Street Upper Riccarton	Christchurch 8041	Oindrila	Support	No		Email
A Balhorn – Society of Youth Health Professionals Aotearoa NZ	PO Box 8035 Hokowhitu	Palmerston North 4446	Anita	Support	No		Email
T Kunowski	246/623 Coleridge Road RD 2	Darfield 7572	Tony	Support	No		Email
P G Young	84D Avonhead Road Avonhead	Christchurch 8042	Peter	Support	Yes	Yes	Email
S Thielmann	299 Hendersons Road Hoon Hay	Christchurch 8025	Silas	Support	No		Email
S Atkinson – People First			Simon	Support	No		Email
S Thielmann - Community & Public Health – Canterbury DHB	PO Box 1475	Christchurch 8140	Silas	Support	No		Email
M Matheson – People First NZ Inc Midsouth Region	301 Tuam Street Christchurch Central	Christchurch 8011	Margaret	Support	No		Email
E Maguire – 298 Youth Health Centre	1/25 Churchill Street Christchurch Central	Christchurch 8013	Emma	Support	Yes	Yes	Email
D E A Deering	28 Rutherglen Avenue Ilam	Christchurch 8041	Daryle	Support	No		Email
P Carrell – Anglican Diocese of Christchurch	PO Box 4438	Christchurch 8140	Peter	Support	Yes		Email
S Langley	15 Cordyline Place	Christchurch 8083	Steve	Support	Yes		Email

	Waimairi Beach						
K O'Grady – The Loft	PO Box 24161 City East	Christchurch 8141	Kate	Support			Email
G Kendrew - Aviva	PO Box 24161 City East	Christchurch 8141	Gwenda	Support		Yes	Email
S Vallance	73 Kinloch Road	Little River 7591	Suzanne	Support	Yes		Email
F Stewart – Cultivate Christchurch Ltd	PO Box 1156	Christchurch 8140	Fiona	Support	Yes		Email
Wayne Francis Charitable Trust	4 Ash Street Christchurch Central	Christchurch 8011	Jennifer	Support	Yes		Email
<u>Late Submission</u>	PO Box 6015		Maria				Email
M F Mathieson – McAuley Trust	Victoria St West	Auckland 1142		Support		Yes	

Y He	63A Trafalgar Street Waterloo	Lower Hutt 5011	Yongxin	<b>Oppose</b>	No		Email
I Jackson	1 McFarlane Street Mt Victoria	Wellington 6011	Ian	Oppose	Yes	Yes	Email
C H L Mateara	10 Keast Place	Lincoln 7608	Clare	Oppose	No	Yes	Email
M E J Mateara	10 Keast Place	Lincoln 7608	Mark	Oppose	No	Yes	Email
J C C Law	23 Eversleigh Street St Albans	Christchurch 8014	John	Oppose	Yes		Email
V Williams	54 Kotuku Crescent Woolston	Christchurch 8023	Vince	Oppose	Yes		Email
W Logeman	5 Gracefield Avenue Christchurch Central	Christchurch 8013	Walter	Oppose	Yes		Email
R Manthei	50 Gracefield Avenue Christchurch Central	Christchurch 8013	Robert	Oppose	Yes		Email
D D Dawson & L Kelly	6 Beveridge Street Christchurch Central	Christchurch 8013	Desmond/Lynn	Oppose	Yes		Email
K Tapley	5 Gracefield Avenue Christchurch Central	Christchurch 8013	Kate	Oppose	Yes		Email
D L El-Ammar	16A Gracefield	Christchurch 8013	Diane	Oppose	No		Email

	Avenue Christchurch Central						
R & B Hall	368A Durham Street North Christchurch Central	Christchurch 8013	Richard/ Beverley	Oppose	No		Email
J & S Simpson	7 Brookford Place Westmorland	Christchurch 8025	Jeanette/St ephen	Oppose	Yes		Email
B Matthews	24 Gracefield Avenue Christchurch Central	Christchurch 8013	Bryce	Oppose	Yes		<b>Post</b>
Victoria Neighbourhood Assoc Inc	C/- 50 Gracefield Avenue Christchurch Central	Christchurch 8013	Sir/Madam	Oppose	Yes	Yes	Email
W Fergusson (White)	45A Gracefield Avenue Christchurch Central	Christchurch 8013	Wendy	Oppose		Yes	Email
I White	45A Gracefield Avenue Christchurch Central	Christchurch 8013	Ian	Oppose		Yes	Email
L Johnson & P O'Brien	20 Muritai Terrace Mt Pleasant	Christchurch 8081	Lewis/Patri cia	Oppose	No		Email
SA Bloxham on behalf of RA Bloxham	171 Springfield Road St Albans	Christchurch 8014	Sara/Rose mary	Oppose			Email
G J White	2/20 Gracefield Avenue Christchurch Central	Christchurch 8013	Graham	Oppose	Yes		Email
R G Hair	43 Gracefield Avenue Christchurch Central	Christchurch 8013	Roderic	Oppose	Yes		Email
D Chambers & R H James	56 Gracefield Avenue Christchurch Central	Christchurch 8013	David/ Rae	Oppose	Yes	Yes	Email
S & P Olds	1/362 Durham Street North Christchurch Central	Christchurch 8013	Sharon/ Peter	Oppose	Yes		Email
R N Davison	52 Gracefield Avenue Christchurch Central	Christchurch 8013	Robert	Oppose	No		Email
K Leighton	28 Seaview Road	New Lynn 0772	Kate	Oppose	No		Email

	RD 2						
M G Ambrose	2/362 Durham Street North Christchurch Central	Christchurch 8013	Michael	Oppose	No	Yes	Email
M Prentice & K Giles-Pain	15 Scarborough Fare Scarborough	Christchurch 8081	Michael/ Kevin	Oppose	Yes		Email
C L Collett	94C Salisbury Street Christchurch Central	Christchurch 8013	Carmen	Oppose	Yes		Email
DN Sheppard & Estate of JW Rout	PO Box 2426	Christchurch 8140	David	Oppose	No		Email
P & R Honiss	188A Valley Road	Mt Maunganui 3116	Paul/ Rebecca	Oppose		Yes	Email
H J McVicar	6 Peacock Street Christchurch Central	Christchurch 8013	Heather	Oppose	No	Yes	Email
S Stagg	309 Bealey Avenue Christchurch Central	Christchurch 8013	Sue	Oppose	No		Email
M Ruscoe	21 Beveridge Street Christchurch Central	Christchurch 8013	Michael	Oppose	No		Email
M W Little	16 Gracefield Avenue Christchurch Central	Christchurch 8013	Micheal	Oppose	No		Email
D M Little	16 Gracefield Avenue Christchurch Central	Christchurch 8013	Dianne	Oppose	No		Email
D Kelly	68 Martin Avenue Beckenham	Christchurch 8023	Dave	Oppose	Yes		Email
J Copplestone	PO Box 22514	Christchurch 8140	Jill	Oppose	Yes	Yes	Email
E L Harris	PO Box 811	Christchurch 8140	Elizabeth	Oppose	Yes	Yes	Email
S Copplestone	PO Box 22514	Christchurch 8140	Sophie	Oppose	No		Email
D J Cameron	PO Box 1276	Christchurch 8140	Dean	Oppose	Yes	Yes	Email
M J Jamieson	99 Salisbury Street Christchurch Central	Christchurch 8013	Murray	Oppose	Yes	Yes	Email Post
Salisbury West Community Preservation Group	C/- Resource Management Group PO Box 908	Christchurch 8140	John	Oppose	Yes	Yes	Email

J J Gordon	6/362 Durham Street North Christchurch Central	Christchurch 8013	Julia	Oppose	No	Yes	<b>Post</b>
K H Tod & J Y Lee	368 Durham Street North Christchurch Central	Christchurch 8013	Kenneth/ Justine	Oppose	No		Email
A Tresilian	26 Beveridge Street Christchurch Central	Christchurch 8013	Anthony	Oppose	Yes		Email
G Gillon and J & R Hawke	4/362 Durham Street North Christchurch Central	Christchurch 8013	Gail/Julie/Ri chard	Oppose			Email
P Huggins	49A Gracefield Avenue Christchurch Central	Christchurch 8013	Pauline	Oppose	Yes	Yes	Email

IN THE MATTER OF The Resource  
Management Act 1991

AND

IN THE MATTER OF a Land Use  
Resource Consent Application by The Youth Hub Trust;  
RMA/2020/405, for a mixed use residential and community facility at  
109 Salisbury Street, Central City

## Statement of Nicola Williams Urban Design Assessment

### Introduction

My name is Nicola Helen Williams. I am employed in the position of Senior Urban Designer at the Christchurch City Council. Previously, I was employed by Ōtākaro Limited for a year, and prior to that the Auckland Design Office within Auckland Council for approximately 8 years. There I was involved in the design policy development of the residential sections of the Unitary Plan, as well as being a contributor to the residential design guidance in the Auckland Design Manual.

I have worked in the field of urban design for over 20 years. I hold the qualification of Master of Urban Design from The University of Melbourne, and Bachelor of Urban Planning (Hons) from the University of Auckland. I am a member of the Urban Design Forum.

I have been asked to provide urban design comments on the above application on behalf of the Council. I have been involved with the proposal since the first pre application meeting on 1 August 2019. During this time, I attended meetings with the Applicant and provided extensive design advice in relation to matters of the general arrangement of the activities on the site, frontage considerations to the two street interfaces, and privacy and safety. The proposal was then reviewed by the Christchurch Urban Design Panel on 3 September 2019, which I have also responded to in this memo.

#### The Proposal

1. The proposal includes a residential complex for young people who require safe accommodation, associated community support services and a series of arts and recreation spaces, on the former Canterbury Bowling Club site on Salisbury Street in the Central City.
2. Two residential components are proposed either side of the centralised services area– a two-storey assisted housing (22 No. sleeping units with ensuites and two No. Supervisor units -one on each floor) area near the western internal boundary; and a more independent set of three-storey terraced dwellings on the eastern boundary, fronting Gracefield Avenue. A detached, two-storey Manager's townhouse is proposed also on this edge, on the northern corner of the site where the width of Gracefield Avenue splays out.
3. Secondary to the above core activities are ancillary training activities, which include a café fronting Salisbury Street (potentially based on a gift or koha system if training residents) and a market garden for horticultural training on the roof of the central building.
4. Landscaping accommodates for at least 20% of the site and includes evergreen native trees within the 3.6-metre wide area along the northern boundary; intermittent tree planting along the 4-metre building separation along the western boundary, retention of mature maple tree along the Salisbury Street interface, and along the eastern Gracefield Avenue interface, a mix of feature trees, native gardens and mid-rise brick walls to obscure rubbish bins.



5. 17 bike parking spaces are proposed alongside the Salisbury Street frontage and 42 spaces within the covered cycle parking area in the staff carpark accessed off Gracefield Avenue. There are 3 visitor parking spaces off Salisbury Street – the main entrance – as indicated by a whale style architectural welcome.

#### Context

6. This former Canterbury Bowling Club site on the northern side of Salisbury Street sits approximately halfway between Durham Street North and Colombo Street in the Victoria Quarter of the Central City.
7. Hagley Park is an 8-minute walk to the west and the area is particularly walkable to other civic attractions such as Tūranga adjacent the Cathedral Square and the Central Bus Interchange just south of the Square.
8. The character of Salisbury Street offers a mix of residential typologies, as well as ancillary activities that support neighbourhood life. Within a 5-minute walk, these neighbourhood amenities in the residential city centre zone include two architects' offices, a childcare centre, motels, a church community, and a yoga studio. The scale of development along Salisbury Street is 'dense-low', generally including a 2-3 storey height and up to 4 storeys in recent apartment developments opposite the site.
9. The current one-way, east-bound nature of Salisbury Street establishes a relatively busy street. Buses share the road and there is a bus stop on the northern side of the street near the site. Signalised pedestrian crossings at the intersections with Durham Street North and Colombo Street provide a safe crossing points along this currently vehicular heavy route. Numerous property owners have constructed moderate high fences, assumingly to buffer traffic noise, however overall the street still exhibits good proportions and with a light mix of activities to support the Residential City Centre zone, offers a good level of safety and is a reasonably good walkable neighbourhood.
10. In contrast to the scale and activity on Salisbury Street, Gracefield Avenue offers a more intimate sense of enclosure due to its narrow throat entry off Salisbury Street at 10-metres wide. At the northern end of the subject site, the street corridor expands out to 20-metres in width and this metric carries around the northern section of Gracefield Avenue to meet Durham Street North. The qualities of the northern section include wide and natural landscape berms, large street trees and un-engineered footpaths and kerbs, which collectively create an attractive streetscape quality and a slower speed traffic environment.
11. In terms of current development, a medium-scale apartment development is currently being completed on the south side of Salisbury Street (no. 118), as well as many of the traditional 13m wide x 40m deep residential sites on the east-west leg of Gracefield Avenue are currently being redeveloped to more compact, quality housing typologies. The area is experiencing a regular level of change, as anticipated as the Central City becomes a more attractive living, working and recreational neighbourhood.

## Urban Design Assessment

#### Site Arrangement

12. The general arrangement of the proposal includes a central hub of activities, flanked by residential development on the eastern and western edges of the site. The arrangement has now been carefully designed to locate the assisted housing area deeper into the site to offer greater personal security to the vulnerable residents. On the eastern side adjacent to Gracefield Avenue, terraced housing (matching the typology immediately to the south and north) directly fronts Gracefield Avenue and each of the five terraces have their own front door and entranceway accessed off a landscaped front yard and brick wall to screen the rubbish bins.
13. Overall, the arrangement of the site, which includes a pattern of 'public fronts and private backs', is supported in that it creates a good level of activity and passive surveillance, which will result in a safer street environment, as well as a safer assisted housing area the back of the site.

## Form and Massing

14. The massing strategy includes areas of moderate height (by way of the greenhouse) in the central part of the site, and then tapers down to the residential and street boundaries. Whilst the overall form is below the potential height limit, the strategy to keep low at the edges reduced the perception of any bulk along the residential interfaces.
15. The main entrance to the Youth Hub is denoted by a striking marker building (whare) on Salisbury Street. The location of the main entrance here is supported given this is the most visible and accessible location, as well as minimising unnecessary traffic along Gracefield Avenue.

## Amenity

16. The proposal meets the 20% minimum area for landscaping, however the extent of hard paving for courtyard spaces offers another layer of all year-round amenity within the site for young people. Notably the basketball court has been relocated internally with the site as recommended by the Urban Design Panel.

## Materials and Finishes

17. The terraced dwellings along Gracefield Avenue offer a strong domestic aesthetic due to the use of two variations of brick, as well as timber framing of the smaller secondary entry for health specialists. The windows are large and fully glazed, offering good opportunities to view through. However there may be some perceived privacy limitations for residents and some overlooking issues given the size of the windows are 1.9-metres high by 1.3 metres wide in some instances. The stairwells are fully glazed from floor to ceiling so visibility of residents moving up and down the floors will be more visibility in combination with the narrower width of this section of Gracefield Avenue. Please see the recommendations at the end of this memo for the applicant to address.

## Urban Design Panel

18. I have reviewed the plans and the applicant's response to the Urban Design Panel recommendations and agree that all of these matters have been satisfactorily addressed by the resource consent set of drawings. Notably, the removal of the basketball court from the rooftop was a significant design move that will considerably contribute to a more harmonious level of neighbourhood amenity.

## District Plan Provisions

19. The following assessment reviews the application against Section 14.15.33 of the District Plan: Urban design in the Residential Central City Zone:
  - a. *The extent to which the development, while bringing change to existing environments:*
    - I. *engages with and contributes to adjacent streets, lanes and public open spaces.*

The proposal which includes both residential and complementary wrap-around support services will bring a level of change to the site from its previously recreational use as a bowling club. This change, which whilst always comes with the unknowns of its new occupants, does engage very responsively and responsibly to both of its adjacent streets with a more mixed use offer on the Salisbury Street (matching the existing context) and matching residential with a high quality residential offer on Gracefield Avenue. I consider this assessment matter to be met.

- II. *integrates access, parking areas and garages in a way that is safe for pedestrians and cyclists, and that does not dominate the development.*

There is very limited parking for vehicles (only staff in the small northern carpark) and four spaces for visitors off Salisbury Street). Vehicular parking does not dominate the development as residents are not likely to have a car. Numerous pockets of cycle parks are provided as well as a covered bicycle parking area for residents. There are additional courtyard areas for scooters if required. This assessment matter has been met.

*III. has appropriate regard to:*

- 1. residential amenity for occupants, neighbours and the public, in respect of outlook, privacy, and incorporation of Crime Prevention Through Environmental Design principles; and*

Considerable regards has been given to the amenity of the residents, however I do have some recommendations regarding perceived privacy that are detailed in the next section of this memo.

In terms of safety to the assisted housing area, the applicant has now added a door through the housing entry / concierge area. To address this criteria, further design development and a management strategy regarding how (personnel only or are swipe cards issued), who and when residents, support staff and whether visitors are allowed through the housing entry / concierge area. If these recommendations are sufficiently addressed by the applicant, then this assessment matter can met.

- 2. neighbourhood context, existing design styles and established landscape features on the site or adjacent sites.*

The proposal successfully integrates its more independent housing into the local residential context of Gracefield Avenue. The form and design of these terraces have picked up on the warm, traditional character of the established neighbourhood with a hint of colour to offer a fresh contribution / flavour.

The existing mature tree on Salisbury Street has been retained and a robust and diverse landscape plan has been prepared. In particular evergreen native trees are proposed on the northern boundary to mediate the step up in form to the glass house above. Further details in the form of a planting schedule which illustrates specific installation sizes will be recommended as part of any approved consent.

*IV. provides for human scale and creates sufficient visual quality and interest.*

The proposal will undoubtedly provide a sufficient level of visual quality and interest. The different components collectively offer a low rise scale that resonates with the existing scale of the neighbourhood. I have however recommended further investigation into opportunities for reduced glare and increased privacy from the upper level greenhouse.

#### Bins and Fencing

20. The service areas within each of the Gracefield Avenue terraces are understood slightly undersized. Further investigation needs to be undertaken by the applicant to ensure that 3 x rubbish bins can fit in these spaces in a way that does not compromise the quality landscape amenity proposed. Alternatively, given the limited green waste likely to be produced by these terraced dwellings with a more formal landscaped courtyard as their outdoor living space, a system of returning food scraps into mulch for the gardens could be established to reduce the need for green bins altogether.

## Response to Submitters

21. A number of submissions raised concerns relating to privacy and overlooking. The specific concerns of those properties directly adjacent to or opposite the site are discussed below.

#### 6/362 Durham Street North

22. Concerns relating to being overlooked from the proposal – namely the assisted living quarters. Whilst the setback of the proposed assisted living quarters are 4-metres from the shared boundary and therefore comply with the District Plan, I acknowledge that the length and extent of glazing along the first floor, west facing elevation could result in a perception of overlooking. Please refer to the recommendation below for the applicant to investigate.

#### 5 Gracefield Avenue

23. The applicant raises concerns relating to overlooking into their courtyard. There will be no overlooking into their east-facing front yard facing Gracefield Avenue as the terraced dwellings are further north (also fronting Gracefield Avenue). The submitter's western back yard is adjacent to the side wall of the single storey café and part of the outdoor courtyard. Given the existing fence along this boundary and the proposed landscaping along this edge, it will be difficult for residents and visitors at the café to view into the back of the property at No. 5 Gracefield Avenue.

#### 16a Gracefield Avenue

24. The owners of both 16 and 16A Gracefield Avenue both expressed concerns regarding being overlooked. I acknowledge that this section of Gracefield Avenue is only 10-metres wide and the opportunity of being overlooked (particularly for No. 16 on the street edge) has the opportunity for a degree of overlooking. As illustrated in the aerial overlay at the end of this memo, the Manager's Unit is proposed opposite No. 16. The ability for overlooking at the ground level will be obscured by the wall which forms an internal courtyard. At the upper level, there is a bedroom window that is approximately 2-metres high. Given 10-metres is still a distance where one person could look across and depict shapes and facial features, it is recommended that the applicant review the width of this window as it relates to the dwelling and outdoor space of No. 16.
25. The proposed Terraced Houses also offer a moderate amount of glazing across Gracefield Avenue. I appreciate the proportions of the windows create a coherent architectural expression, however the size and frequency of these glazed areas (fully glazed stairwells in combination with large living / study and bedrooms) on the northern terraced house adjacent to the secondary entrance may contribute to a sense of overlooking.
26. As illustrated in the aerial overlay at the end of this memo, 3-4 of the terraced houses are proposed directly opposite the Salvation Army carpark, so it is the northern terraced house that requires further investigation by the applicant. This is principally due to this section of Gracefield Avenue being only 10-metres in width, which creates a closer building separation either side of the street and therefore, in combination with the extent of glazing, the potential for a heightened sense of overlooking. See recommendations below.

#### General overlooking concerns from the rooftop greenhouse

27. Numerous submissions mentioned the possibility of overlooking from the upper level greenhouse. I have therefore recommended that the applicant review this and propose mitigation measures in their evidence prior to the Hearing.

## Recommendations

1. That the applicant review opportunities for increased opacity in the glazing from at least the first 1500mm from the finished floor level of the Greenhouse on the top of the central services building. Opportunities to reduce glare from the glazing shall also be explored and presented to Council for review and approval.
2. That the applicant review opportunities for reduced width of (compliant) window glazing on the first floor of the western elevation of the Assisted Housing. Additionally investigate high level windows on the stair wells to enable daylight in, without the view of all foot traffic movements.
3. That the applicant review the size of the bedroom window on the northern elevation of the Assisted Housing block given its proximity (2-metres) off the boundary with the property at No. 36 Gracefield Avenue.
4. That the applicant review the size of the bedroom windows and the full extent of glazing on the stairwells in the independent terraced housing on Gracefield Avenue to create additional privacy for residents and an improved sense of privacy for No. 16 Gracefield Avenue opposite the northern terraced house.
5. That the applicant demonstrate that the bin areas within each of the Gracefield Avenue terraces are fit for purpose. There may be the potential that the green bins for food waste could be shared or that a system designed to use food scraps as manure for the rooftop garden.
6. That the applicant provide further design development around the housing entry / concierge area, as well as a management strategy regarding how (personnel at front desk only or/or security cards), who and when

residents, support staff and potentially other visitors are allowed through to the assisted housing courtyard and beyond.

## Conclusion

30. From a built form and amenity perspective, the proposed Youth Hub has the potential to offer a rather captivating, yet contextually responsive contribution to the local neighbourhood. Additionally, the landscape quality and onsite amenity is a strong feature of the proposal and balances the massing of the buildings which is likely to establish a more human-scaled development to its setting.
31. Direct benefits to the immediate neighbourhood from this dense-low form are likely to result in more sunlight and sky views, an improved landscaped quality and a high quality architectural offer which can value to the neighbourhood.
32. Notwithstanding these benefits, I have summarised a list of recommendations for the applicant to address in their evidence, which includes questions and issues raised by both myself and by submitters.
33. If these recommendations are satisfactorily addresses, the proposal will be able to meet the outcomes and design criteria sought by The Plan.

Thank you for this opportunity to review the submitted plans and elevations. Please do not hesitate to contact me if you have any further questions.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Nicola Williams', followed by a period.

Nicola Williams

Senior Urban Designer

Urban Design, Regeneration and Heritage, Christchurch City Council

Nic.williams@ccc.govt.nz



## Appendix 1: Supporting Documents - Site Photos and aerial overlay



View south from Gracefield Avenue towards the site. The dwellings at 3/363 and 6/362 Durham Street North within close proximity of the site can be seen to the right.



View south to the site between Nos. 31 (left) and 35 from Gracefield Avenue.



Redevelopment of 27 Gracefield Avenue on the bend in the road (north of the subject site)



16 Gracefield Avenue on the eastern side opposite the proposed Manager's house.





Road Name  
 Road Boundary  
 Rating Unit  
 Rating Unit #10  
 Rating Unit #10  
 Rating Unit #10  
 Aerial Photo 2018 C80  
 Aerial Photo 2018 C80

1 : 750 on A3  
 14/09/2020 11:41:07 AM

**Christchurch City Council**  
 ph: 941-8300 fax: 941-8385

Accuracy not guaranteed. Onsite verification required. Display of data scale dependent, full detail available at 1:500. Client Selected Legend.  
 Copyright © 2013 Reproduction prohibited

MEMO

---

To: Shona Jowett, Planner, Resource Consents Team

From: Isobel Stout, Senior Environmental Health Officer, Environmental Health Team

Date: 17 August, 2020

Re: **RMA/2020/405 at 109 SALISBURY STREET – ENVIRONMENTAL HEALTH REPORT**

---

**Scope**

1. This application relates to the proposal for the construction and operation of a community facility, inclusive of a café, market garden, sheltered housing and six residential units.
2. I understand that the proposal is a non complying activity under the relevant plans and therefore the purpose of this memo is to comment on the potential environmental health effects for the purposes of a decision.
3. I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

**Noise**

4. Noise is expected to be the principal adverse environmental health effect that could be generated by the activity.
5. The application has been accompanied by an acoustic assessment that has made measurements of the ambient noise environment currently and predictions of the noise that could be generated by aspects of the activity.
6. Noise can be expected to be generated predominantly from the movement of vehicles and people on site, breakout noise from indoor events, and use of outdoor spaces for a café and recreation area/basketball court. External plant and equipment such as heat pumps has also been considered.
7. The District Plan sets noise standards for the area (Category 3, Central City) of 55dBLAeq between 0700 and 2300 and 45 dBLAeq from 2300 to 0700.
8. The current noise environment in the area was measured at between 49 and 53 dBLAeq during daytime hours and between 40 and 42 dBLAeq in the evenings. The noise is very much a function of traffic on Salisbury St.

9. In estimating the noise that could be produced by various activities it has been assumed that a 2m high acoustic fence is built around the entire perimeter of the site and that event space, the café, parking, and basketball court would be available only during daytime hours.
10. The materials proposed for the construction of the events/functions space are largely concrete with limited glazing. This is ideal for controlling the breakout of noise from the interior. The acoustic report has made some recommendations about the level of noise that may be desired indoors and therefore the thickness of the concrete required to ensure that noise levels at site boundaries meet the District Plan standards.
11. Clearly there are an infinite number of permutations of interior sound level and wall materials and thicknesses. I am satisfied however that with care about the design, breakout noise can be controlled in order that it will comply with standards.
12. Noise from the basketball court has been estimated at 73dBLAeq which seems a reasonable starting point. The court is surrounded by buildings on two sides and at the nearest 'open' boundary the noise is expected to reduce to 50dBLAeq. I am satisfied that this leaves some margin for compliance with the District Plan standards and agree that use of the court should be restricted to daytime hours only.
13. Noise from the three separate parking areas (10 spaces in total) has been quite extensively assessed. As vehicles have to cross the site boundary to access the road there is almost inevitably a brief period of time where the District Plan standards may be exceeded. This is even more likely to be the case at night time when the standard is lower.
14. In considering this small (less than 5dBA) and occasional exceedance I am confident that in terms of effect off site it is no different to there being residential apartments of any kind that could be built there and in the context of the current traffic noise environment largely undetectable on its own account.
15. I do agree that the café activity should be closely assessed as the café is near a boundary and so noise is more likely to be exceed standards here. I am satisfied however with the prediction of compliance at the boundary with daytime use of the café only.
16. With regard to external plant and equipment it is expected that the selection, installation and subsequent operation of all external plant will be designed to comply from the outset of such a project so this should be achieved readily.
17. I am aware that there have been submissions raising concerns with regard to noise that may be generated from the site, in particular the rooftop garden space and the basketball court with respect to a residential environment.
18. Whilst a rooftop garden may be unusual I would not expect the potential for noise to be any different as a result of its elevation. If anything noise rises so starting higher off the ground may make any sounds less noticeable.
19. The basketball court, or at least a backboard and hoop is a common feature of many residential environments. There is a potential for nuisance noise notwithstanding compliance with the District Plan noise standards. In this case I expect the onsite supervision of the players would act in the same way as parents anywhere; that is to act with awareness and respect for neighbours.
20. It is worth noting that compliance with the noise standards doesn't mean that no noise would be heard at neighbouring properties. The noise standards are set at levels internationally considered to lead to an acceptable level of amenity in a central city residential setting.

21. The potential for noise from the residents themselves is best controlled by way of 'house rules' and the oversight of a live in manager. This situation has been shown to work well in other boarding house or hostel situations to ensure that nuisance noise such as radios and groups gathering outdoors on the property can be promptly attended to if necessary.
22. Another matter raised in submission was regarding lighting and a 'lantern effect'. I am not entirely sure what this means but it may be having lights visible on upper floors. It is generally a simple matter to comply with light spill rules but to avoid the visibility of lights altogether would I believe, be unnecessary in a residential environment and no different to any multi level residential development.

## **Conclusion**

1. Noise and lighting can both be controlled in order to provide a suitable inner city residential environment both on site and off site.

Isobel Stout

**Senior Environmental Health Officer**

**ENVIRONMENTAL HEALTH TEAM**

MEMO

---

To: Shona Jowett, Planner, Resource Consents Unit

From: Andy Milne, Senior Transport Planner, CSTR Asset Planning

Date: 19 August 2020

Re: RMA/2020/405 – 109 Salisbury Street

---

- 1) This memo sets out my review of the integrated transport assessment provided in support of the proposal to develop Youth Hub Facility at 109 Salisbury Street Christchurch. The structure of this report is based on my response to the transport non-compliances identified as:
  - a) 7.4.3.2 Minimum number of cycle parking facilities required
  - b) 7.4.3.4 Manoeuvring for parking & loading Areas
  - c) 7.4.3.7 Access design
  - d) 7.4.3.10 High trip generators
  - e) 7.4.3.11 Vehicle access to sites fronting more than one street – Within the Central City
- 2) In my assessment of the effects of the identified transport non-compliances I have included my consideration of the key transport issues raised in the submissions – summarised as lack of parking and traffic impacts on the surrounding road network in particular Gracefield Avenue.
- 3) I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.
- 4) Reference in the ITA is made to the potential changes to Salisbury Street with the opportunity through the City Council changes to Salisbury Street to provide for on-street loading. At the time of writing this report, design options for Salisbury at the early stages and no decisions have been made regarding the nature of changes to Salisbury Street. Therefore the proposal should be assessed on the basis of the existing environment.

**7.4.3.2 Minimum number of cycle parking facilities required**

- 5) The layout of the cycle parks does not comply with the District Plan requirements (the internal cycle stands). These are proposed to be wall-mounted which are not in accordance with the District Plan cycle parking requirements. The proposal provides for 95 cycle parks which exceeds the District Plan minimum requirements.
- 6) Based on the proposed activities and applying the cycle parking requirements as set out in Table 7.5.2.1 of the District Plan equates to about 60 cycle spaces. In considering whether the provision for cyclists is practical<sup>2</sup>, I consider that to facilitate ease of use of these cycle parking spaces and encourage full use of the cycle parking offered at least one of the wall hung cycle parking sheds should provide for a complying cycle parking layout. The most obviously accessible parking spaces are those access off Salisbury Street. Complying cycle parking in the covered area off Salisbury Street would effectively result in a lower total provision of around 75 cycle parking spaces which I consider to be sufficient to serve the needs of the proposal.

#### **7.4.3.4 Manoeuvring for parking & loading Areas**

- 7) On-site manoeuvring area is required to be provided in accordance with District Plan Appendix 7.5.6 such that a vehicle exiting a carpark does not require more than one reversing movement. The narrow width of the Gracefield access means that vehicles will require more than one reverse movement to exit some of the spaces or as recommended in the ITA may best be accessed from a reverse movement.
- 8) The ITA highlights that users of the spaces will be familiar with the manoeuvring constraints of the car park and by implication likely develop a parking technique that best allows them to enter and exit the spaces with minimal turning.
- 9) The turning paths provided by the applicant demonstrate that users of the car park can exit the site in forward gear and with visibility requirements out of the access being achieved through the design of low walls I consider that the car park is functional and can operate with little impact on the safety and efficiency of Gracefield Avenue.
- 10) Taking the above in to consideration, the low number of car parks and the likely low turn-over nature of these spaces - given that they are for residents and staff, I consider a reverse movement onto these spaces can occur will little impact on Gracefield Avenue. Overall I consider the level of adverse effects associated with this non-compliance to be negligible.
- 11) On site loading provision is likely to be needed to service the proposal. No potential changes to Salisbury Street has been adopted by Council at this stage. Therefore on-street loading provision cannot be relied upon as a solution to servicing the site. As an alternative solution and as identified in the ITA the Salisbury Street car park can be managed to accommodate deliveries by co-ordinating on-

---

<sup>2</sup> Standard 7.4.4.4b iii Minimum number of cycle parking facilities required - Whether the provision for cyclists is practicable and adequate considering the layout of the site, and the operational requirements of the activity on the site.

site parking spaces such that they are made clear early on the day of the deliveries. I consider this to be a suitable approach for accommodating on-site loading in a constrained central city site.

#### **7.4.3.7 Access design**

- 12) Adjustments to the entry design from the proposed Gracefield access have been made that now include a low wall. This provides for intervisibility between exiting vehicles and people approaching the access on Gracefield Avenue from the north. The Gracefield access is narrower than the required width (3.6m compared to 4.0m required). This is a consequence of the structural design of the building. Two way access points typically require a width of 5.5m so the 3.6m access will only accommodate vehicle movement in one direction at any time. This may result in a vehicle entering/exiting the access having to wait for another vehicle to clear the access. Given the low number of car parks and the likely low turn-over nature of these spaces, I consider the probability of such a situation to be low.
- 13) Should such a situation arise I consider that the low speeds involved in using the access would result in low safety effects on the Gracefield Avenue. The combination of the estimated trip generation from the Gracefield staff car park at 3 vph and the relatively low use of Gracefield Avenue of 15 to 30 vph, the adverse effects on users of Gracefield Avenue are likely to be low. The expected low turnover of the Gracefield car park can be further reduced by allocating the staff spaces to particular staff members.

#### **7.4.3.10 High trip generators**

- 14) The proposed activity has been estimated as generating 34 to 83 vehicle movements per hour, so assessment is required against the Basic ITA matters. The ITA uses typical trip rates associated with the various proposed activities and then adjusts these downwards using a parking reduction factor to reflect constrained parking and the accessibility of the site to alternative modes of transport. This is a novel way to estimate trip generation and in my view is a genuine attempt to adopt a methodical approach to the estimation process. However in my view the estimates may be conservatively high for the following reasons:
  - a. the strong interaction/association between each activity on site would result in many of the trips being internalised within the site.
  - b. The ITA identifies the residential component as primarily displaced teens that are unlikely to own vehicles – this is likely to reduce trips and parking demand associated with this element
  - c. It has been well established that providing more parking encourages more people to drive<sup>3,4,5,6,7</sup>. Parking standards offer the single most direct impact on levels of car use amongst land use measures. With only nominal on-site parking and constrained on-street parking availability, the impact of these

---

<sup>3</sup> Transport and Sustainability Volume 5, Chartered Institution of Highways and Transportation, 2005

<sup>4</sup> Donovan, S, J Varghese, B Parfitt, M Huggins and N Mumby (2011) Integrated transport and land use: Sylvia Park as a case study. NZ Transport Agency research report 444. 80pp.

<sup>5</sup> MRCagney Pty Ltd. (2013). Establishing a Strategic Direction for Parking in Christchurch, Christchurch City Council, July 2013, Section 2.3, page 10.

<sup>6</sup> Transport Planning and Traffic Engineering – CA O'Flaherty, 1996, p64

<sup>7</sup> IHT (2005) 'Parking Strategies and Management', Institution of Highways and Transportation, p 20

elements on both traffic generation and parking demand can potentially be far greater than the adjustment factor used in the ITA method may suggest.

- d. The proposals offer a Travel Plan as a condition of consent. Effective travel plans can reduce traffic generation and parking demands significantly and many of the elements proposed as part of the draft Travel Plan Framework included in Appendix 4 of the ITA include elements that can contribute to lower trip generation and parking demands. The Final Travel Plan Framework can be further developed in conjunction with City Councils' Business Travel Planning co-ordinators that can be contacted at [TransportEducation@ccc.govt.nz](mailto:TransportEducation@ccc.govt.nz)

- 15) For the reasons set out above I consider that the impacts of additional site related traffic and parking demands in the immediate area are likely to be lower than the estimates set out in the ITA suggest. Given the existing low parking availability in the area of the site and with particular focus on demand management as part of the Travel Plan Framework that can be secured as a condition of consent, I consider the effects of the car parking supply and demand at the application site to be acceptable and potentially less than what could occur with an alternative complying residential development.
- 16) Likewise the vehicle trip generation influenced by the constrained parking and Travel Plan Framework is unlikely in my view to have an adverse impact on the safety and efficiency of the road network.
- 17) The site provides for two points of entry that include specific provision for pedestrian access. The main entrance is taken directly from the footway on Salisbury Street which at 3.3m in width offers a high level of service for pedestrians. I am satisfied that pedestrian visitors to the site are well served by the main Salisbury Street entrance.
- 18) The Gracefield access includes a separated pedestrian route to the secondary entrance. While the single 1.2m wide footway on Gracefield Avenue offers a lower level of service for pedestrians it does provide a suitable, safe route for site visitors coming to and from the west of the site. I consider that the crossing of Gracefield Avenue to enter/exit the site can be done with relative safety given Gracefield Avenue local classification and associated low traffic volumes. In my view the site layout and surrounding infrastructure provides for reasonably safe and convenient access opportunities for travel other than by private car.
- 19) The ITA has identified the accessibility of the site in terms of its proximity to public transport services and major cycle networks. As set out in my consideration of the parking supply, by virtue of the sites' location, constrained parking supply and Travel Plan Framework, I am satisfied that the development site presents the opportunity to minimise or reduce travel to and from the activity by private vehicles and encourage public and active transport use in accordance with the District Plan.

#### **7.4.4.22 Vehicle access to sites fronting more than one street - within the Central City**

- 20) While the application identifies a non-compliance with the above rule, Council decisions have yet to be made on the future treatment of Salisbury Street and therefore I am of the view that the application needs to be assessed against the current existing environment. Salisbury Street (classified as a local



Distributor) is one-way and as such the District Plan states that a second vehicle access point may be gained from the next most preferred road.

- 21) On that basis the proposed Gracefield Avenue access is not technically a non-compliance. The assessment of the second access as set out in the ITA nevertheless demonstrates that the adverse effects of the access are considered acceptable given the low traffic volumes associated with Gracefield Avenue and the low vehicle movements associated with the Gracefield access. I concur with this view.
- 22) From a transport perspective I can support the proposal with the following recommendations:
  - a) In regard to the Salisbury covered, secure cycle parking structure, Cycle Park stands shall be designed in accordance with District Plan requirements
  - b) Servicing of the site shall occur within the site and be facilitated by on-site management of the manoeuvring space such that service vehicles may enter and exit the site on forward gear.
  - c) Staff car parking shall be limited to the use of allocated persons only
  - d) A Travel Plan shall be provided that includes those travel management measures as listed in District Plan Table 7.5.14.1(j).

## Appendix 6 – Relevant objectives and policies from the Christchurch District Plan

### Chapter 6.1 – Noise

#### 6.1.2.1 Objective - Adverse noise effects

- a. Adverse noise effects on the amenity values and health of people and communities are managed to levels consistent with the anticipated outcomes for the receiving environment.

##### 6.1.2.1.1 Policy - Managing noise effects

- a. Manage adverse noise effects by:
  - i. limitations on the sound level, location and duration of noisy activities;
  - ii. requiring sound insulation for sensitive activities or limiting their location relative to activities with elevated noise levels.

##### 6.1.2.1.2 Policy - Noise during night hours

- a. Achieve lower noise levels during night hours to protect sleep, and the amenity values of residential and other sensitive environments, so far as is practicable.

### Chapter 8 – Earthworks

#### 8.2.4 Objective - Earthworks

- a. Earthworks facilitate subdivision, use and development, the provision of utilities, hazard mitigation and the recovery of the district.

##### 8.2.4.1 Policy - Water quality

- a. Ensure earthworks do not result in erosion, inundation or siltation, and do not have an adverse effect on surface water or groundwater quality.

##### 8.2.4.3 Policy - Benefits of earthworks

- a. Recognise that earthworks are necessary for subdivision, use and development, the provision of utilities, hazard mitigation and the recovery of the district.

##### 8.2.4.4 Policy - Amenity

- a. Ensure, once completed, earthworks do not result in any significant shading, visual impact, loss of privacy or other significant detractor from the amenity values enjoyed by those living or working in the locality.

#### 8.2.5 Objective - Earthworks health and safety

- a. People and property are protected during, and subsequent to, earthworks.

##### 8.2.5.1 Policy - Land stability

- a. Avoid earthworks that will create a significant risk to people and property through subsidence, rockfall, cliff collapse, erosion, inundation, siltation or overland flows.

##### 8.2.5.2 Policy - Nuisance

- a. Subject to [Policy 8.2.4.3](#), ensure that earthworks avoid more than minor adverse effects on the health and safety of people and their property, and do not generate continuous or persistent noise, vibration, dust or odour nuisance.

### 8.2.5.3 Policy - Vehicle movement

- a. Subject to [Policy 8.2.4.3](#), ensure that the transportation to and from a site of earth, construction or filling material is safe and minimises adverse transport network and local amenity value effects.

### 8.2.5.4 Policy - Earthworks design

- a. Ensure that earthworks over identified thresholds are designed to enable the anticipated land use.

## Chapter 7 – Transport

### 7.2.1 Objective - Integrated transport system for Christchurch District

- a. An integrated transport system for Christchurch District:
  - i. that is safe and efficient for all transport modes;
  - ii. that is responsive to the current recovery needs, future needs, and enables economic development, in particular an accessible Central City able to accommodate projected population growth;
  - iii. that supports safe, healthy and liveable communities by maximising integration with land use;
  - iv. that reduces dependency on private motor vehicles and promotes the use of public and active transport;
  - v. that is managed using the one network approach.

Advice note:

1. The "One Network Approach" is an approach where the transport network is considered as a whole. The aim of this approach is to ensure that the management and provision of all transport infrastructure (including all transport modes) is well connected and undertaken in an efficient and integrated manner. For more guidance on how the "one network approach" is applied, please refer to the [Greater Christchurch Transport Statement 2012](#) and [Christchurch Transport Strategic Plan 2012](#).

#### 7.2.1.2 Policy - High trip generating activities

- a. Manage the adverse effects of high trip generating activities, except for permitted activities within the Central City, on the transport system by assessing their location and design with regard to the extent that they:
  - i. are permitted<sup>†</sup> by the zone in which they are located;
  - ii. are located in urban areas and generate additional vehicle trips beyond what is already established or consented, unless the already established or consented vehicle trips are specifically included in rule thresholds;
  - iii. are accessible by a range of transport modes and encourage public and active transport use;
  - iv. do not compromise the safe, efficient and effective use of the transport system;
  - v. provide patterns of development that optimise use of the existing transport system;
  - vi. maximise positive transport effects;
  - vii. avoid significant adverse transport effects of activities where they are not permitted by the zone in which they are located;
  - viii. mitigate other adverse transport effects, such as effects on communities, and the amenity values of the surrounding environment, including through travel demand management measures;
  - ix. provide for the transport needs of people whose mobility is restricted; and
  - x. integrate and coordinate with the transport system, including proposed transport infrastructure and service improvements.

<sup>†</sup> Refers to the activity being listed as a permitted activity in the activity status table for the zone in which it is located.

Advice note:

[Policy 7.2.1.2](#) also achieves [Objective 7.2.2](#).

#### 7.2.1.3 Policy - Vehicle access and manoeuvring

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

Advice note:

1. Policy 7.2.1.3 also achieves [Objective 7.2.2](#).

### 7.2.1.5 Policy - Design of car parking areas and loading areas

- a. Require that car parking areas and loading areas are designed to:
  - i. operate safely and efficiently for all transport modes and users;
  - ii. function and be formed in a way that is compatible with the character and amenity values of the surrounding environment; and
  - iii. be accessible for people whose mobility is restricted.

Advice note:

1. Policy 7.2.1.5 also achieves [Objective 7.2.2](#).

### 7.2.1.6 Policy - Promote public transport and active transport

- a. Promote public and active transport by:
  - i. ensuring new, and upgrades to existing, road corridors provide sufficient space and facilities to promote safe walking, cycling and public transport, in accordance with the road classification where they contribute to the delivery of an integrated transport system;
  - ii. ensuring activities provide an adequate amount of safe, secure, and convenient cycle parking and, outside the Central City, associated end of trip facilities;
  - iii. encouraging the use of travel demand management options that help facilitate the use of public transport, cycling, walking and options to minimise the need to travel; and
  - iv. requiring new District Centres to provide opportunities for a public transport interchange.
  - v. encouraging the formation of new Central City lanes and upgrading of existing lanes in the Central City, where appropriate, to provide for walking and cycling linkages and public spaces.
  - vi. developing a core pedestrian area within the Central City which is compact, convenient and safe, with a wider comprehensive network of pedestrians and cycle linkages that are appropriately sized, direct, legible, prioritized, safe, have high amenity, ensure access for the mobility impaired and are free from encroachment.

## Chapter 14 – Residential

### 14.2.1 Objective - Housing supply

- a. An increased supply of housing that will:
  - i. enable a wide range of housing types, sizes, and densities, in a manner consistent with Objectives [3.3.4\(a\)](#) and [3.3.7](#);
  - ii. meet the diverse needs of the community in the immediate recovery period and longer term, including social housing options; and
  - iii. assist in improving housing affordability.

#### 14.2.1.1 Policy - Housing distribution and density

- a. Provide for the following distribution of different areas for residential development, in accordance with the residential zones identified and characterised in Table 14.2.1.1a, in a manner that ensures:
  - i. new urban residential activities only occur in existing urban areas or in greenfield priority areas identified in Map A of the [Canterbury Regional Policy Statement](#);
  - ii. high density residential development in the Central City, that achieves an average net density of at least 50 households per hectare for intensification development;
  - iii. medium density residential development in and near identified commercial centres in existing urban areas where there is ready access to a wide range of facilities, services, public transport, parks and open spaces, that achieves an average net density of at least 30 households per hectare for intensification development;
  - iv. a mix of low and medium residential density development in greenfield neighbourhoods, that achieves a net density (averaged over the Outline development plan) of at least 15 households per hectare;
  - v. greenfield land that is available for further residential development up to 2028;
  - vi. low density residential environments in other existing suburban residential areas and in the residential areas of Banks Peninsula, and in small settlements are maintained, but limited opportunities are provided for smaller residential units that are compatible with the low density and township suburban environment; and
  - vii. within Banks Peninsula, limited low density residential development adjacent to existing residential townships and small settlements, that complements the surrounding environment, is able to be efficiently serviced by public infrastructure and in some limited circumstances private infrastructure; and is in locations not subject to significant risks to life safety and property damage from natural hazards.



Table 14.2.1.1a

Residential Suburban Zone	Provides for the traditional type of housing in Christchurch in the form of predominantly single or two storeyed detached or semi-detached houses, with garage, ancillary buildings and provision for gardens and landscaping. The changing demographic needs and increasing demand for housing in Christchurch are provided for through a range of housing opportunities, including better utilisation of the existing housing stock. A wider range of housing options will enable a typical family home to be retained, but also provide greater housing stock for dependent relatives, rental accommodation, and homes more suitable for smaller households (including older persons).
Residential Suburban Density Transition Zone	Covers some inner suburban residential areas between the Residential Suburban Zone and the Residential Medium Density Zone, and areas adjoining some commercial centres. The zone provides principally for low to medium density residential development. In most areas there is potential for infill and redevelopment at higher densities than for the Residential Suburban Zone.
Residential Medium Density Zone	Located close to the Central City and around other larger commercial centres across the city. The zone provides a range of housing options for people seeking convenient access to services, facilities, employment, retailing, entertainment, parks and public transport. The zone provides for medium scale and density of predominantly two or three storey buildings, including semi-detached and terraced housing and low-rise apartments, with innovative approaches to comprehensively designed, high quality, medium density residential development also encouraged. Residential intensification is anticipated through well-designed redevelopments of existing sites, and more particularly through comprehensive development of multiple adjacent sites. Zone standards and urban design assessments provide for new residential development that is attractive, and delivers safe, secure, private, useable and well landscaped buildings and settings.
Residential Central City Zone	Located within the Central City, the Residential Central City Zone has been developed to contribute to Christchurch's liveable city values. Providing for a range of housing types, including attractive, high density living opportunities, the zone utilises the potential for living, working and playing in close proximity to the commercial centre of the city. The character, scale and intensity of non-residential activities is controlled in order to mitigate effects on the character and amenity of the inner city residential areas.

### 14.2.1.3 Policy - Residential development in the Central City

- a. To restore and enhance residential activity in the Central City by:
- i. providing flexibility for a variety of housing types which are suitable for a range of individual housing needs;
  - ii. providing for a progressive increase in the residential population of the Central City in support of Policy 14.2.1.1.a.ii;
  - iii. assisting in the creation of new inner city residential neighbourhoods and the protection of amenity of inner city residential neighbourhoods; and
  - iv. encourage the comprehensive redevelopment of sites that are no longer required for non-residential purposes.

### 14.2.1.7 Policy - Non-household residential accommodation

- a. Enable sheltered housing, refuges, and student hostels to locate throughout residential areas, provided that the building scale, massing, and layout is compatible with the anticipated character of any surrounding residential environment.

Note: This policy also implements Objective 14.2.2.

### 14.2.4 Objective - High quality residential environments

- a. High quality, sustainable, residential neighbourhoods which are well designed, have a high level of amenity, enhance local character and reflect the Ngāi Tahu heritage of Ōtautahi.

Note: Policies 14.2.6.1, 14.2.6.2, 14.2.6.3, 14.2.6.6, and 14.2.6.8 also implement Objective 14.2.4.

#### 14.2.4.1 Policy - Neighbourhood character, amenity and safety

- a. Facilitate the contribution of individual developments to high quality residential environments in all residential areas (as characterised in Table 14.2.1.1a), through design:
- i. reflecting the context, character, and scale of building anticipated in the neighbourhood;
  - ii. contributing to a high quality street scene;
  - iii. providing a high level of on-site amenity;
  - iv. minimising noise effects from traffic, railway activity, and other sources where necessary to protect residential amenity;
  - v. providing safe, efficient, and easily accessible movement for pedestrians, cyclists, and vehicles; and
  - vi. incorporating principles of crime prevention through environmental design.

## 14.2.6 Objective - Non-residential activities

- a. Residential activities remain the dominant activity in residential zones, whilst also recognising the need to:
  - i. provide for community facilities and home occupations which by their nature and character typically need to be located in residential zones; and
  - ii. restrict other non-residential activities, unless the activity has a strategic or operational need to locate within a residential zone or is existing guest accommodation on defined sites.

Note: this objective and its subsequent policies do not apply to brownfield sites.

### 14.2.6.1 Policy - Residential coherence character and amenity

- a. Ensure that non-residential activities do not have significant adverse effects on residential coherence, character, and amenity.

Note: This policy also implements Objective 14.2.4

### 14.2.6.2 Policy - Community activities and community facilities

- a. Enable community activities and community facilities within residential areas to meet community needs and encourage co-location and shared use of community facilities where practicable.
- b. Enable larger scale community activities and community facilities within defined arterial locations that:
  - i. are within walking distance of the Central City and suburban commercial centres;
  - ii. front onto core public transport routes; and
  - iii. are not dominated by residential development.

Note: This policy also implements Objective 14.2.4

### 14.2.6.3 Policy - Existing non-residential activities

- a. Enable existing non-residential activities to continue and support their redevelopment and expansion provided they do not:
  - i. have a significant adverse effect on the character and amenity of residential zones; or
  - ii. undermine the potential for residential development consistent with the zone descriptions in Table 14.2.1.1a.

Note: This policy also implements Objective 14.2.4

### 14.2.6.4 Policy - Other non-residential activities

- a. Restrict the establishment of other non-residential activities, especially those of a commercial or industrial nature, unless the activity has a strategic or operational need to locate within a residential zone, and the effects of such activities on the character and amenity of residential zones are insignificant.

### 14.2.6.5 Policy - Retailing in residential zones

- a. Ensure that small scale retailing, except for retailing permitted as part of a home occupation, is limited in type and location to appropriate corner sites on higher order streets in the road hierarchy.

### 14.2.6.8 Policy - Non-residential activities in Central City residential areas

- a. Within Central City residential areas:
  - i. ensure non-residential activities are of a small scale and compatible with residential activities;
  - ii. ensure non-residential activities are focussed on meeting the needs of the local residential community or depend upon the high level of amenity inherent in the Residential Central City Zone;
  - iii. ensure new non-residential activities do not compromise the role of the Residential Central City Zone, the Central City Business Zone, or the aim of consolidating that area of the Central City or the Central City Mixed Use Zones;
  - iv. enable the on-going operation, use and redevelopment of existing fire service facilities; and
  - v. protect residential amenity by controlling the character, scale and intensity of non-residential activities.

#### 14.2.8 Objective - Central City residential role, built form and amenity

- a. A predominantly residential environment offering a range of residential opportunities, including medium to high density living, within the Central City to support the restoration and enhancement of a vibrant city centre;
- b. A form of built development in the Residential Central City Zone that enables change to the existing environment, while contributing positively to the amenity and cultural values of the area, and to the health and safety, and quality and enjoyment, for those living within the area.

##### 14.2.8.1 Policy - Building heights

- a. Provide for different maximum building heights in areas of the Residential Central City Zone with some areas requiring a reduced height compatible with the existing predominant character.

##### 14.2.8.2 Policy - Amenity standards

- a. Prescribing minimum standards for residential development which:
  - i. are consistent with higher density living;
  - ii. protect amenity values for residents;
  - iii. integrate development with the adjacent and wider neighbourhood;
  - iv. provide for a range of current and future residential needs; and
  - v. recognise cultural values.