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Turning **Information** Into **Insight**

Housing and Business Choice PC 14 Public Engagement

SYNTHESIS REPORT

June 2022

Prepared by Global Research Ltd

For



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Introduction

This report presents a synthesis of the comments received from 721 respondents to Christchurch City Council's Draft Housing and Business Choice Plan Change (PC14).

To set Ōtautahi Christchurch up for future growth, planning rules need to be rethought to allow more housing choice. The District Plan needs to be brought in line with direction from central government to enable more development within the city's existing urban footprint – the National Policy Statement on Urban Development 2020 (NPS-UD) and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.

However, some parts of our city have qualities, known as Qualifying Matters, which mean rules enabling increased development will not apply, or the level we enable increased development to is limited, and remains subject to resource consent approval.

Housing and Business Choice PC14 Public Engagement provided an online and paper form for respondents to provide feedback on the draft plan. Respondents also took the opportunity to provide comment in their own formats, such as emails or reports.

The online and paper form included the following questions:

- Are we proposing the right areas for development above 12 metres? (Yes/No)
 - > Comments (free text)
- Do you have any comments about the proposed Qualifying Matters that will restrict intensified development or thresholds for needing a resource consent? (free text)
- Does the proposed plan change allow for enough business intensification? (Yes/No)
- Any other comments about the proposed plan changes? (free text)

Community feedback was open between 11th April 2022 - 13th May 2022 and will help further develop the Draft Heritage Plan Change ahead of formal consultation in August 2022.



721

TOTAL RESPONSES RECEIVED



40

FEEDBACK FORMS



281

FEEDBACK IN RESPONDENTS' OWN FORMATS

Report structure

Following this introduction, the report is divided into six sections, which were influenced by the questions asked of the public in the engagement, plus the strong themes which emerged in the community's comments.

- Section 1: The right areas developed above 12m
- Section 2: Mixed use and business intensification
- Section 3: Proposed changes to central zone
- Section 4: Medium density residential zone
- Section 5: Qualifying Matters
- Section 6: Financial contributions

Every comment was individually read and grouped to synthesise the points made and measure the weight of opinion on each topic.

Throughout the report, the total number of comments on particular sections, subsections or topics has been stated in each heading. Within the discussion, the number of points made on particular sub-topics has been consistently represented by the amounts described below:

- > A very large number: 150+ comments
- > A large number: 100 – 149 comments
- > A sizeable number: 75 – 99 comments
- > A substantial number: 50 – 74 comments
- > A considerable number: 25 – 49 comments
- > A moderate number: 15 – 24 comments
- > Several comments: 8 – 14 comments
- > A small number: 4 – 7 comments
- > A few: 3 comments
- > A couple: 2 comments

The following descriptions were also used to describe the number of points made: one quarter, one third, half, two thirds, three quarters, and lastly, all of the comments.

Note that the amounts of comments made have been included to make it possible to understand the relative level of interest shown by respondents in particular topics. The number of comments shouldn't be interpreted as exact, as the 'coding' of comments involves analysts making thousands of judgements on what topics individual points should be coded to; the amounts would change slightly if different interpretations were made. For this reason, the numbers should be considered as good indications of the weight of different opinions on topics, and not an absolute number. This is the nature of all thematic analysis of this type.

Direct quotes from respondents are presented throughout the report to illustrate particular points made. Quotes are italicised and indented from the margin. Spelling mistakes and grammar are only corrected where meaning would otherwise be unclear.

Organisations' names have been attached to some comments, to enhance understanding of an issue or the named organisation had a specific interest in the issued discussed.

DRAFT HOUSING AND BUSINESS CHOICE PLAN CHANGE (PC14) PUBLIC COMMENT

OVERVIEW

To set Ōtautahi Christchurch up for future growth, planning rules need to be rethought to allow more housing choice. The District Plan needs to be brought in line with direction from central government to enable more development within the city's existing urban footprint – the National Policy Statement on Urban Development 2020 (NPS-UD) and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. Qualifying Matters mean rules enabling increased development will not apply, or the level we enable increased development to is limited, and remains subject to resource consent approval.

721 respondents took the opportunity to provide comment on Christchurch City Council's draft proposal. Community feedback was open between 11th April 2022 - 13th May 2022 and will help further develop the Draft Heritage Plan Change ahead of formal consultation in August 2022.



WHAT THE COMMUNITY SAID...

BUILDING HEIGHTS

CCC is proposing the right areas for development above 12m

YES
32%

NO
68%

950
comments

Three times as many respondents sought a reduction in the area developed above 12m than those who sought an increase.

Key points from those who sought a reduction in area developed over 12m:

- Over half of the comments predicted negative liveability and social impacts for those living in areas developed above 12m.
- A sizeable number of respondents urged the Council to focus development over 12m in the central city or on vacant land.
- Earthquake risks were a concern.

We are continually reminded of the benefits of siting homes for sun, but the new rules will cause a loss of sunlight and outlook. It seems our government has given no thought to the impact on the mental health of residents.

Key points from those who sought an increase in areas developed over 12m:

- Respondents who supported the proposed changes or who sought an increase in area either suggested specific places that could be enlarged or supported a staged approach to increasing development.

Qualifying Matters to restrict intensified development, or resource consent required

800
comments

Four times as many respondents suggested increasing Qualifying Matters than those who either agreed with the proposal or suggested reducing Qualifying Matters.

Increasing Qualifying Matters:

- Two thirds of the comments about increasing Qualifying Matters discussed character or heritage, with many focused on the specific areas of Riccarton Bush, Richmond, the 15 Papanui Memorial Streets, and the Beckenham Character Area.

It is great to see more heritage included in the heritage plan. Again I am sure that there are even more buildings that could be included. Once they are gone they are gone...

- Other features that people wanted protected with Qualifying Matters were natural features - Riccarton Bush and the Papanui Memorial Streets were again discussed.

Reduction in Qualifying Matters:

- Respondents primarily commented on particular heritage and character sites and infrastructure, with the general sentiment that development is more valuable than wide-ranging character or heritage preservation.

Those who agreed with the Qualifying Matters outlined in the draft proposal focused most on heritage and character, infrastructure and coastal hazards.



BUSINESS INTENSIFICATION

The proposed plan change allows for enough business intensification

YES
76%

NO
24%

100
comments

The most common arguments in support of the proposed plan change allowing for enough business intensification were that businesses moved to the suburbs after the earthquakes, and Covid-19 has resulted in more people working from home. It was argued that these factors have reduced demand in the central city.

A substantial number of respondents supported mixed-use commercial and residential zones to activate streetscapes, and add life and vitality by increasing street activity.

To improve the vibrancy of the central city more of it should be mixed use. Many buildings should have commercial on bottom, offices or residential on top.

OTHER TOPICS

Medium Density Residential Zone

170
comments

Commentary was received around changes to Medium Density Residential Zoning, which is currently being managed at a national level rather than council level. Those who opposed Medium Density Residential Zone changes discussed concerns about loss of sunlight and amenity if tall buildings are built on neighbouring properties, as well as the perceived seismic risks for more highly developed land.

The current recession plane rules have provided residential sections with privacy and light. To suddenly have a three storey structure appear over your fence with its corresponding loss of privacy is grossly unfair. These developments should be in blocks of like buildings with roads and parks and open space buffering the traditional style of housing.

Financial contributions

100
comments

Around three-quarters of respondents who commented on financial contributions either supported the financial contributions approach or wanted it increased. Respondents valued the tree canopy, and those who wanted increased measures felt developers should not have the option to pay to avoid protecting trees.

Trees should be included, so I support the proposals. Tree planting on residential streets and public spaces should be made a standard requirement of new developments.

You should not be able to reduce open space and tree cover in housing areas by paying money to plant elsewhere - this is like selling carbon credits overseas - the trees must be in the area of the development even if this reduces density of development.

The few who felt the financial contributions were too strict posed arguments that the scheme would be too difficult to calculate accurately, that it would be difficult to administer, and that it would be too expensive.

The introduction of Financial Contributions for 'tree canopy cover' will add another layer of complexity to the development process and is considered to 'double up' on the charges already being levied by Council as part of Development Contributions.



Proposed changes to central zone

25
comments

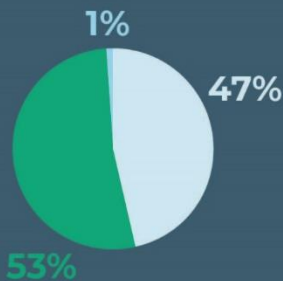
There was a desire for the central city to be developed ahead of other areas. This was considered an unique opportunity for Christchurch which doesn't exist in other cities in New Zealand. Central city development was considered important to increase the vitality and success of the central city and to compete with suburban development. Increasing the residential population in the central city was considered beneficial.

The long-term vision for Christchurch should be the starting point, including a more condensed "Core" (rather than encouraging greater spread of taller and more intensified development buildings well outside the CBD). Greater development to encourage vibrancy.



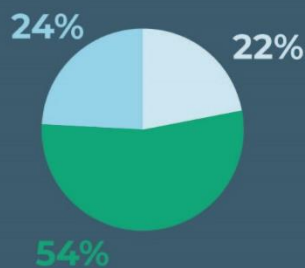
WE HEARD FROM 721 RESPONDENTS FOR THIS PROJECT

GENDER



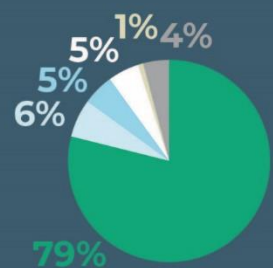
Female
Male
Gender diverse

AGE



34 years or younger
35 to 64 years
65 or older

ETHNICITY



NZ European
Other European
Asian
Maori
Middle Eastern Latin American or African
Other
Pacific Peoples (0%)



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A photograph of a modern residential building with a mix of white and dark grey exterior panels and a dark grey metal roof. The building features large windows and a clean, architectural style. In the foreground, there are green plants. A blue horizontal bar is overlaid on the middle of the image, containing the text 'Summary of comments' in white.

Summary of comments

Summary of comments

Section 1: The right areas developed above 12m (950 comments)

- > The comments seeking a reduction or elimination of the areas in which development can occur over 12m were over three-times as many as the comments supporting what was proposed or seeking an increase in these areas.
 - o These results aligned with the 'yes' or 'no' responses to the quantitative question (Are we proposing the right areas for development above 12 metres?) – 68% of respondent selected 'no'.
- > Those who sought to **reduce areas** provided many reasons to support their opinions, often in great detail:
 - o The most common reason given for reducing or eliminating the areas proposed for building to a height above 12m was the predicted impact that these changes would have on the communities that will live in these areas. These comments made up just over half of all comments received on this section. Respondents who were concerned about potential negative impacts for communities most commonly objected to impacts of building heights from neighbours, in particular loss of sun and privacy, and that changes to housing types would negatively impact community life.
 - o A sizeable number of respondents urged the Council to focus development of buildings over 12m in the central city or on vacant land.
- > Those who **supported** the areas proposed for buildings over 12m provided fewer reasons and were generally shorter statements.
- > Those who wanted the areas proposed for development over 12m **increased** made fewer than one tenth of all comments, with general statements encouraging more areas being developed or increasing the size or height limits of proposed areas.

Section 2: Mixed use and business intensification (100 comments)

- > A substantial number of respondents supported mixed-use commercial and residential zones. Of these, just over 40 respondents made a short supportive statement via a Generation Zero form. The benefits were seen to be activated streetscapes and increased numbers of people on streets that would frequent businesses and add life and vitality to areas.
- > Over three quarters of respondents agreed that the plan change allows for enough business intensification, with comments explaining that the post-earthquake and Covid19 trend of businesses moving to the suburbs and more people now working from home is reducing demand in the centre of the city.

Section 3: Proposed changes to central zone (25 comments)

- > There was a desire for the central city to be developed ahead of other areas, and this opportunity was seen as being different to Auckland and Wellington.
- > Central city development was considered important to increase the vitality and success of the central city and to compete with suburban development. An increased population in the central city was considered beneficial.

Section 4: Medium density residential zone (170 comments)

- > The vast majority of comments opposed increasing Medium Density Residential Zones, expressing similar concerns about potential negative impacts to those identified in relation to building higher than 12m. Direct impacts from tall buildings from neighbours was again the most discussed issue, particularly the impacts of shading and changes to community dynamic and liveability.
- > Seismic risks and the likely negative impacts from a future seismic event were also reasons why people were fearful of more and higher development on susceptible land.

Section 5: Qualifying Matters (800 comments)

- > Around four times as many comments were made suggesting qualifying matters should be increased than comments which either agreed with what is proposed or suggested reducing qualifying matters.
- > Two thirds of the comments which discussed **increasing qualifying matters** discussed character or heritage items. Just under half of these comments discussed the preservation of character and heritage generally,

with the majority of comments focused on specific areas. The most commonly discussed areas were Riccarton Bush, Richmond, the 15 Papanui Memorial Streets, and the Beckenham Character Area.

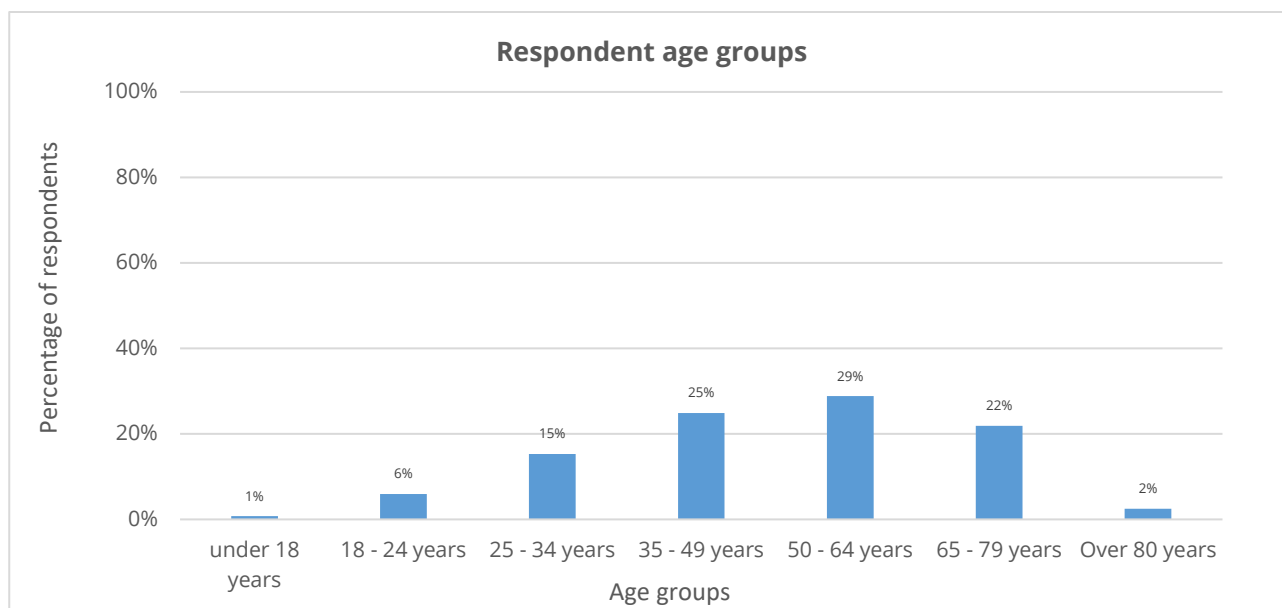
- > Other factors that people wanted protected with qualifying matters were natural features, with Riccarton Bush and the Papanui Memorial Streets again identified frequently as requiring protection from development.
- > Those who **sought a reduction** in qualifying matters primarily focused on particular heritage and character sites and infrastructure, with the general sentiment that development should be prioritised over wide-ranging character or heritage preservation.
- > Those who **agreed with qualifying matters** as they are outlined in the draft Plan focused most on heritage-character infrastructure and coastal hazards.

Section 6: Financial contributions (110 comments)

- > Around three quarters of respondents who commented either supported the financial contributions approach or considered it too lenient.
- > The respondents who **supported** the approach felt that protecting the tree canopy was important and this was a way to achieve this outcome. There was a desire for trees to be planted close to developments.
- > Those who felt that the **financial contributions were too lenient** (around one quarter of respondents, or 25) felt that the approach allowed developers to pay to avoid having to protect trees which they felt should not occur.
- > Those who felt the financial contributions were too strict posed arguments that the scheme would be too difficult to calculate accurately and to administer – this was summarised as ‘red tape’. Overall, these respondents felt it would be too costly and that costs would be passed on to purchasers.

Who respondents were

RESPONDENT AGE GROUPS



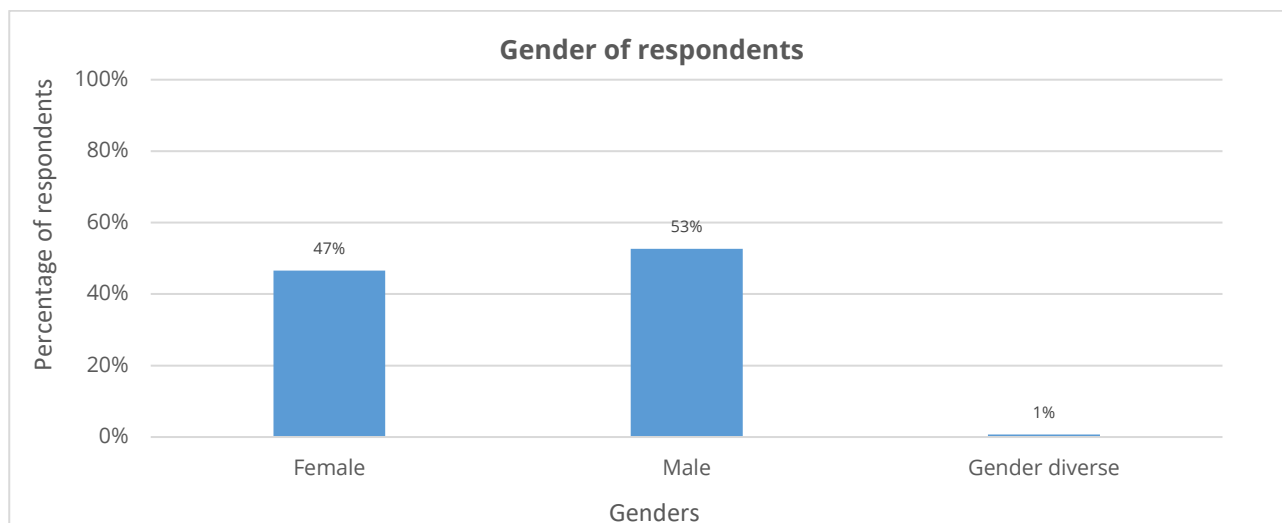
Results

In summary, older respondents were over-represented and younger respondents under-represented.

- > The largest group of respondents was in the 50-64 age group (29%). This group of respondents were over-represented compared with the Christchurch population who comprise 18% of people in the community.
- > The next largest group was those aged 25-34 years (25%). This group of respondents was also over-represented in results as they comprise 16% of the population.
- > Another group that was over-represented was those aged 65-79 (22%). They comprise 11% of the Christchurch population.
- > The representation of over 80 year-olds (2%) was similar to the Christchurch population which comprises 3%.
- > The 18-24 age group made up 6% of respondents; this groups comprise around 10% of the population of Christchurch so are slightly under-represented.
- > Christchurch people under 25 years of age were under-represented in the results with this group comprising 7% of respondents but being 33% of the population. Note the total population included those considered too young to contribute—18% of the population is under 15 years of age.

Note: Comparative Christchurch statistics were from: www.stats.govt.nz/tools/2018-census-place-summaries/christchurch-city#population-and-dwellings.

GENDER OF RESPONDENTS

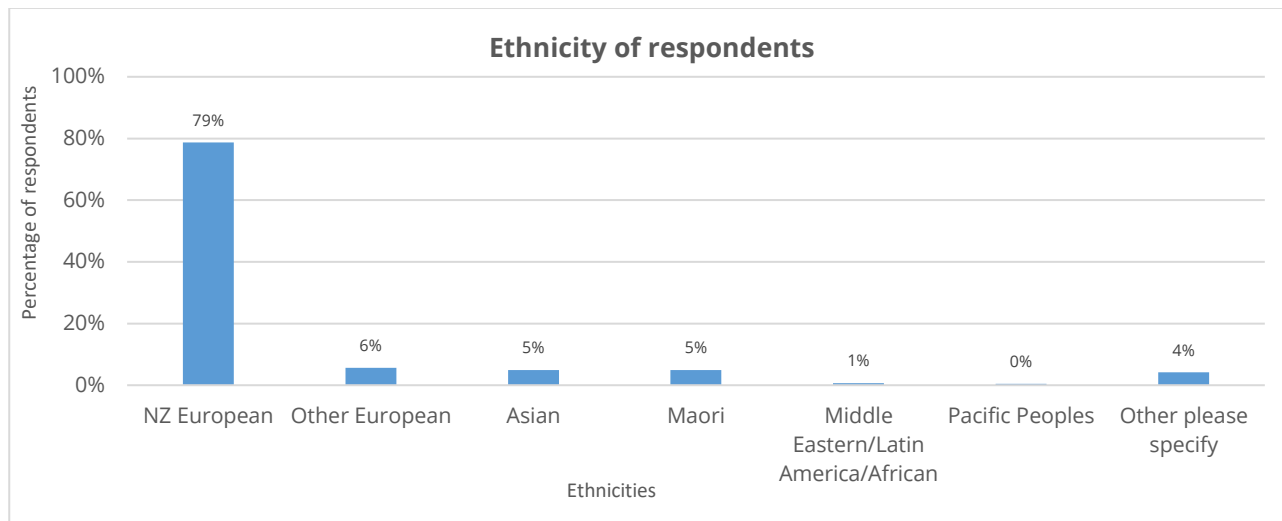


Results

In summary there was a slight over-representation of males in the engagement.

- > The largest group of respondents were males (53%), they were over-represented in the results by 3% as they comprise 50% of the usual population.
- > Conversely the 47% of female who responded were under-represented by 3%.
- > Note that StatsNZ did not report a figure for gender diverse in Census data.

ETHNICITY OF RESPONDENTS



Results

In summary there was an under representation of Māori in the engagement.

- > Europeans (79%) were slightly over-represented, as they make up 78% of the total population.
- > Māori (5%) were under-represented as they comprise 10% of the usual Christchurch population.
- > Pacific people (0%, 2 respondents) were under-represented comprising 4% of the total population.
- > Asians (5%) were under-represented as they comprise 15% of the total population.
- > Middle Eastern/Latin American/African (1%) were slightly under-represented as they comprise 1.5% of the total population.
- > Note: respondents could select more than one ethnicity.

Synthesis of comments



Section 1: The right areas developed

above 12m

950 comments

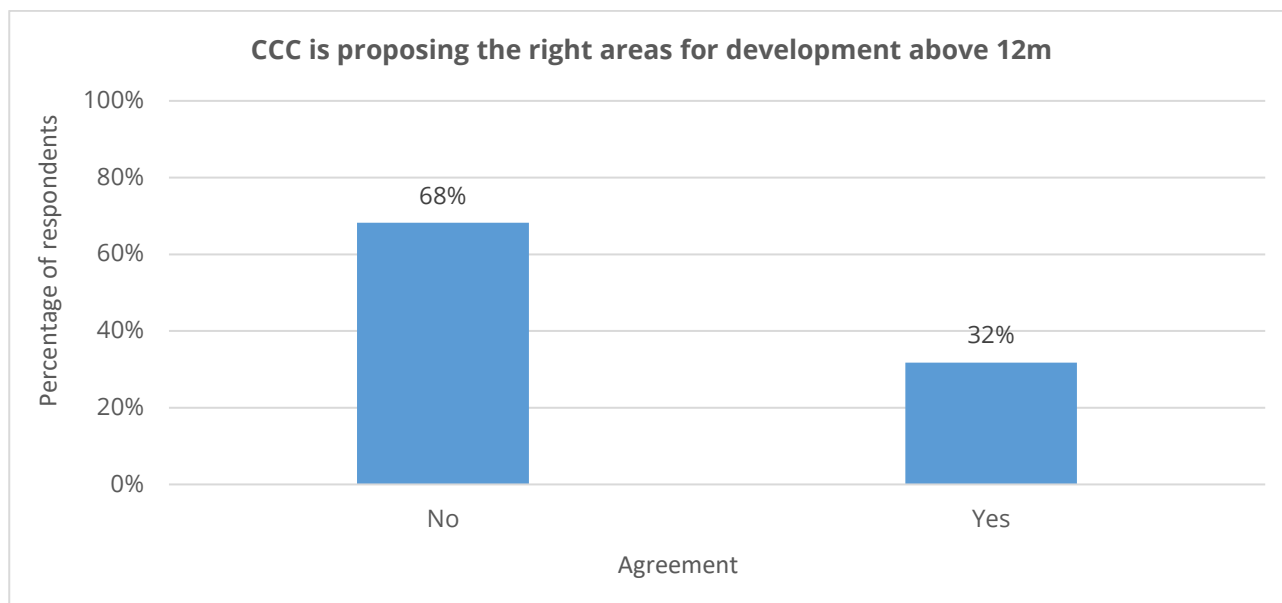
Section summary

- > The comments seeking to reduce or eliminate the areas in which development can occur over 12m were over three times as many as the comments supporting what was proposed or seeking an increase in these areas.
 - o These results aligned with the 'yes' or 'no' responses to the quantitative question (Are we proposing the right areas for development above 12 metres?) – 68% of respondent selected 'no'.
- > Those who sought to **reduce areas** provided many reasons to support their opinions, often in great detail:
 - o The most common reason given for reducing or eliminating the areas proposed for building to a height above 12m was the predicted impact that these changes would have on the communities that will live in these areas. These comments made up just over half of all comments received on this section. The most common negative impacts on communities predicted by respondents were:
 - Tall buildings close to neighbours creating shade on homes and backyards resulting in cold, damp living conditions and negative impacts on plant growth and outdoor activities.
 - Negative impacts on community functioning and wellbeing – in particular, families having to live in smaller homes with less outdoor space, and older people living in multi-level dwellings.
 - Reduced liveability as a result of changes in community dynamics, such as changes in who would live in areas, particularly if small homes are built as short-term rentals.
 - Traffic congestion caused by increased numbers of people as a result of 12m developments. Respondents felt that there was already bad congestion in some areas, which would be worsened.
 - Significant natural areas such as Riccarton Bush were identified as areas which could suffer adverse environmental impacts if dense development occurs nearby.
 - People were concerned about the potential for poor housing design, neighborhood aesthetics, and overall amenity.
 - Many other issues of concern were discussed, including: loss of 'garden city' form and image; loss of privacy, parking issues; and inconsistency with post-earthquake planning.
 - o A sizeable number of respondents urged the Council to focus on higher developments in the central city either exclusively, or at least before suburban areas are developed. Other similar comments suggested there is an abundance of vacant land in Christchurch that should be prioritised for development.
 - o Seismic risks were a concern, with the Christchurch earthquake used as a warning to not build too high on vulnerable land.
- > Those who **supported** the proposed areas for above 12m development offered fewer reasons and made generally shorter statements:
 - o Several of these respondents supported the identified areas, but encouraged a staged approach.
- > Those who wanted zones for development above 12m to be increased made up fewer than one tenth of comments:
 - o Most respondents generally supported developing more areas, or everywhere, with some identifying specific places for development, including: Church Corner, University, Wigram, Spreydon, Sydenham, Linwood, Woolston, Barrington, Woolston, Edgware, Avonhead Mall, Sumner, and New Brighton.
 - o A moderate number of respondents suggested either enlarging identified areas or increasing heights.

Are we proposing the right areas for development above 12 metres?

Respondents were asked: Are we proposing the right areas for development above 12 metres?

Of the 440 respondents who provided feedback via the online survey, 390 answered this question. The chart below presents the results.



Results:

- > Over two thirds of respondents did not agree that the right areas for development above 12m were being proposed.

Support development above 12m 120 comments

The comments synthesised below primarily came from respondents explaining their answer to the yes/no question above. When responses from other questions were relevant to this topic they were also included within this analysis. Responses include both survey responses and comments provided in respondents' own formats.

PROPOSED AREAS ARE APPROPRIATE

84 COMMENTS

Of the respondents who agreed that the proposed areas are appropriate, around half made relatively short statements in support, often raising the various environmental and social benefits of people living in higher density communities. Just under half the comments on this topic were made by respondents using a Generation Zero submission form to express their support for increasing height limits in the city centre and suburban centres.

The following comment encapsulates a number of the positive benefits that were identified:

I support all efforts to encourage 'building up, and not out' within our city limits. Densification enables more amenities closer by - which in turn improves public health, decreases carbon emissions and improves community cohesion. I support all the increased height limits around the proposed centres in the city.

The most prevalent benefit raised was the reduced need for car travel when people live in higher density communities, accompanied by convenient services and facilities. The following comments are examples, with one respondent making an additional suggestion regarding the benefits of increased tax income:

Christchurch was crippled prior to the earthquakes by malls drawing people out of the central city and the current desire to build up and not out is supported, avoiding car-dependent development in Pegasus and Rolleston.

Housing intensification reduces the need for cars and intensifies tax income for further development. Those tax dollars should be used to improve the sewer capacity in the proposed protection suburbs. It is a good thing.

The anticipated economic benefits of the proposed changes were also raised, with people expecting the increased vertical housing capacity to stimulate development and result in more people living in closer proximity to businesses, as well as mitigating the housing crisis. One respondent noted that intensification enabled greater housing supply without affecting valuable soils and natural areas:

... would solve the housing crisis without destroying more of our valuable farm and swamp/forest lands.

This comment was one of the few which articulated the benefits for urban form and functionality:

These seem pretty reasonable. Encouraging high density around malls makes a lot of sense, especially if this includes lot-line to lot-line buildings on the street boundary (at least on the main roads) ideally with the option of commercial space on the ground floor. This might encourage the existing malls to turn to face the street and perhaps become a little less car focussed, and also somewhat democratise our suburban retail environment (with the potential for less of it being controlled by the malls and large commercial landlords).

The CDHB offered support for the 12m areas, agreeing these centres could support increased residential and commercial development. They went on to discuss the benefits services being located close to where people live, and referred to the 15-minute city model and the increased health benefits of this approach.

Environment Canterbury Regional Council was supportive, noting the proposed changes will help reinforce the Central City, Key Activity Centres and neighbourhood centres as the focal point for commercial activities and higher density development, and will reduce dependence on car use. They also stated that it is consistent with the Canterbury Regional Policy Statement (CRPS).

SUPPORT A STAGED APPROACH

8 COMMENTS

Several respondents were generally supportive of the identified areas to develop to heights above 12m, but favoured taking a staged approach rather than allowing one-off or small pockets of development which would have significant impacts on existing low-rise areas. It was felt that a better approach would be to intensify smaller areas as a whole so buildings are a consistent height and have less impact on their surroundings. The following point articulated the preferred approach.

Good urban planning should not enable random high/medium rise building to be scattered in amongst low rise homes of single/two stories. If you need to enable high rise or medium rise apartment buildings then go slowly and deliberately and confine the zones for this so it's like for like next door to one another and ensures uniformity and considered design to Christchurch. It's a beautiful city missing its city centre core, don't ruin it.

Another respondent elaborated on how a staged process might be implemented.

I agree with the proposed zones. However, I am concerned that there is no mechanism to prevent random tall buildings appearing in an otherwise low height area, negatively affecting the character of that neighbourhood. I suggest a staged process that would initially promote revitalisation of the central city. Initially only the city centre and surrounding High Density Zone would be made available for development. This would be reviewed 5 yearly. Then when demand exceeds supply, other non-city centre satellite centres would become available.

There was underlying support for the central city being the focus of development over other areas.

One respondent argued that the planned approach would substantially oversupply housing as intensification was not a pressing need in Christchurch (compared to Auckland and Wellington). They provided a detailed argument for how a different approach could be taken, focusing on underdeveloped land first.

Are there specific areas with significant largely vacant land that are amenable to larger scale planned development, that includes both higher buildings and ample open space and amenities. E.g., as has been done in the East Frame. I believe this approach would produce an outcome that would meet the central government's intensification objectives, complement the great work done on our existing city plan only a decade ago, and support the continued development of Christchurch as a great and remarkable city to live in.

OTHER COMMENTS IN SUPPORT OF 12M AND SUGGESTIONS **28 COMMENTS**

A considerable number of other points were made by respondents who generally supported the areas for development above 12m, but warned against a simplistic or blunt approach and made other suggestions that should be considered in the changes. Many of these responses were quite detailed and specific (Council Offices have the full text), but main points included (in no particular order):

- > Minimum heights (3 stories) as well as maximums to ensure intensification does occur.
- > Various suggestions regarding building design. Detailed discussion of the impacts of recession planes, and the suggestion to modify these to minimise impacts on existing buildings, for example having different rules if there is a vacant section or right of way next door. Other suggestions for design rules covered: 10m separation between buildings; outdoor living spaces; windows facing streets; number of trees required per 250sqm; fencing requirements; garage location on a site; ground floor habitable space; space for bins; impervious surface standards and rainwater capture standards; building ventilation; and High-Density Residential Design Principles.
- > Incentivise perimeter block developments where buildings are built next to the street edge.
- > Rather than height limits, limit the number of storeys, perhaps with storeys beyond a certain height (e.g., 5.6m floor to floor) or mezzanines greater than, for example, 25% of the floor plate area counting as two storeys.
- > Discouraging street-facing parking in commercial developments as it was argued a sea of cars (or empty car-parks) is unpleasant to walk past and often doesn't feel safe.
- > Prohibit automated petrol stations being built around the city as these are unappealing for non-motorists and make people feel significantly less safe.
- > Developing a 15-minute city necessitates more than "simply building houses" – it requires a holistic overview and a new approach to planning to avoid housing estate "catastrophes".
- > Taller residential development on some sites would enable better stormwater management.
- > Public and active transport networks need to accompany developments.
- > Learn from what has worked well in existing high-rise Christchurch projects.
- > Greater focus on the provision of amenities, such as outdoor shared community spaces, planting and sharing food, indoor shared community spaces. In particular amenities should be within 10-15 minutes of people.
- > Consider the risk of a few high-rise buildings absorbing all demand, thereby limiting other development and leading to vacant land remaining.
- > The post-earthquake demand studies were intended to encourage a more vibrant central city and this shouldn't be lost. Another demand study may now refine what is required.
- > Fear that simply reducing height limits will result in unintended consequences.
- > The existing urban design rule could be expanded to include additional assessment matters that would enable consideration of any specific issues associated with tall buildings.
- > Six floors is an appropriate height but car parking, if allowed, should be underground and all occupants should have access to green space of an appropriate size.
- > Recommended increase on the wind test threshold requirements to 22m to allow for a buffer to the Draft Plan Change rules of 20m minimum building heights.

Reduce development above 12 metres comments

474

NEGATIVE IMPACTS ON COMMUNITY

335 COMMENTS

A very large number of comments were made which criticised the negative impacts on communities and individuals of development above 12m. They are discussed below in the order of frequency that points were made.

Shaded, cold homes and health, wind tunnels

35 comments

A considerable number of respondents focused on the negative impacts that large buildings will have on direct neighbours. These respondents were concerned that tall buildings appearing next door will shade neighbours leading to reduced sunshine hours, colder houses and less sun in backyards. The comments below articulate a number of these points and are representative of many of the comments made.

Medium or high-density buildings will inevitably cast significant shadow and greatly reduce light and heat from the sun into neighbouring properties. Many areas with older character housing stock will no longer have the warmth of the sun for winter months. Open, private gardens will be overlooked and without a doubt existing property values will be financially impacted by the building of a 3, 4 or 6 story building in such great proximity.

Christchurch is flat and not suited to three - six storey buildings which will reduce light to neighbouring properties, creating damp homes. Lack of sun and light is detrimental to people's health and wellbeing.

We are continually reminded of the benefits of siting homes for sun, but the new rules will cause a loss of sunlight and outlook. It seems our government has given no thought to the impact on the mental health of residents.

Often these responses provided specific examples of impacts, such as the following.

Currently on Therese Street, there is only one dwelling that has 2 storey. The plan proposed will see this jumping to 4 storey which is totally not aligned with the current character of the street. No resident on the street bought a house here expecting that their property could end up in the shadow of a 4-storey building and losing sunlight.

I have watched these flats go up and am disgusted that Hornby has to have this type of housing right next door to a single storey house. We are supposed to be having nice warm houses and these completely block any natural sunlight to the single storey house next door. Give some thought to the people who have lived in their houses for 40-60 years and then get this slammed next to them. Not a good choice.

This is of a significant concern as if a 6+ story building was built behind us, in an area that has had severe intensification already (multi-unit dwellings) resulting in very small property/section sizes that from information provided, at noon there will still be no sun on the property (12 metre shadow - 6 metres from rear boundary, and 6 metres further shadow would completely cover our house).

Wind tunneling was also anticipated to be a negative impact by some respondents.

High buildings side-by-side in the CBD can create an unpleasant, and sometimes dangerous, wind-tunneling effect at street level.

This comment extended the argument to the central city.

Tall buildings cast long shadows in winter, detrimental to liveability in buildings, streets and spaces they shade e.g. City Mall in winter. Without liveability there will be no community or tourist growth; High buildings channel easterly and southerly winds down to ground level.

Community functioning and wellbeing

24 comments

The next most commonly raised impact of development above 12m was impacts on community functioning and resulting wellbeing for communities and individuals. A moderate number of individual respondents and groups made

similar points around the impacts that intensified housing will have on different living units such as families and older people; the consensus from this group was that what is being proposed will detract from the quality of life for these people and subsequently the whole community.

Many of these arguments could not be articulated better by synthesising them so a number of verbatim quotes are provided below.

Local communities have been developed so that they have ease of access for walking, child friendly and safe, room for parking, back yards, front yards, and houses. Streets are tree lined with sun flooding through, ensuring roads and paths stay dry and safe, plants grow and people feel safe to walk around the neighbourhood. High density housing will change that for suburbs.

Tall buildings inter laced with traditional residential housing will always create disharmony distrust and break up communities who have often lived on one site for many years.

There are also a lot of families living in this area and a four-story building next door will completely compromise their privacy in their homes with their children.

Many high-density buildings are owned by investors rather than families, so they have no vested interest in ensuring the "green" amenities are present. Many are used as Air BNB's or short-term accommodation, tenants of which are not involved in the community, or particularly care about other residents. The heart is removed from the community. What effect will reducing long-term residents from this area have on CBHS, CGHS and the Harakeke St Kindergarten

Mental Health: I struggle to understand or believe that putting people in soulless mass produced boxes could create a positive outcome on mental health and well being ...again given there would be no outdoor space to be creative to just sit and have green space around you. NZ already struggles with massive suicide rates and mental health issues.

The point made in the following comment was that housing type will result in a homogenous group of people choosing to live in intensified developments.

Intensification to the degree planned will result in a more homogenous inner-city population: those willing to, or having no choice about, living in smaller, extensively shaded, expensive (more for less), restricted access (or none at all) to the outside, housing. They are likely to be predominantly younger, single and transient, an outcome that is not conducive to a more livable city for all communities and groups.

Reduced options for older people with the inclusion of vertical buildings, in particular stairs, was raised in this comment along with the impact on families.

Take Merivale for example, where the plan is to allow development above 12 metres around the commercial centre. Almost 20% of Merivale residents are aged 65 or more (2018 census) and almost 25% of residents have lived there for 20 years or more – that is, an older and more stable population than other suburbs. Older people have less mobility and higher needs, and so gradually they will be precluded from living in areas like this. Where will they be siloed? These developments will also be unsuitable for families with children. There's not enough room for kids to throw a ball about, and get the exercise they need. No conscientious parent would allow their young children to go to a public park alone and will need to always find the time to accompany them.

Te Whare Roimata and the Latimer Community Housing Trust provided a long detailed response, including first-hand cases studies of people living in unstable living conditions and intensified housing. This was their conclusion:

Our submission has highlighted the paradox of intensification. On the one hand intensification increases housing supply but to whom, and at what cost to socially disadvantaged communities especially in, geographic locations such as the Inner City East which supplies the city with vital affordable single person housing for people on limited incomes.

Without an analysis of the social consequences of intensification, the ICE experience demonstrates how the plight of the poor, single dweller is overlooked in the rush to create an intensified, compact city. Increased vulnerability, greater competition for the remaining supply of low cost housing, the loss of connectedness and the dislocation from social networks, displacement and/or the risk of homelessness impact on wellbeing and are

some of the downside effects of intensification – eroding choice and raising questions about the ability of the Compact City to deliver the benefits sought. Choice, equity and fairness are quickly lost. Such qualities are recognised in the Council's Strategic Framework⁹ with its vision of ensuring opportunities for all, where equity, diversity and inclusion are valued and development prioritises the social, economic and cultural wellbeing of people and communities as well as the quality of the environment now and in the future, helping to create resilient communities with a strong sense of community and active participation in community life which enables them to own their future.

What the proposed Plan Change 14 and the Council's Strategic Framework seeks, and what the realities are, as experienced by the ICE/Linwood West Community demonstrates a real disconnection that will continue to be hidden in and misunderstood without a social impact analysis and a vision of Just Compact City where equity sits at the heart of all planning processes.

Our submission identifies some steps needed to support this view and provides measures to strengthen the proposed plan's desire to enable housing choice for all.

This point was part of the **Waikura Linwood Central Heathcote Community Board** response.

However, the Board is concerned that high intensity in lower socio-economic areas, such as within the environs of Eastgate Mall, will lead to issues of anti-social behaviour thus increasing the impact on New Zealand Police, and mental health services resources that are already highly stressed. The Board continually hear of issues from its Phillipstown residents who are experiencing high density in a low social-economic area. The Board notes that while economic and environmental impacts have been considered they do not feel that the social and well-being consequences have been considered as thoroughly.

Reduced liveability

19 comments

A moderate number of comments focused on the functionality of communities, with the term 'liveability' appropriately encapsulating the value that many want to retain. Primarily, these comments came from the perspective of the changes that would be imposed on existing residents, with these changes ultimately being rejected by this group.

The following comments sum up the sentiment of these respondents.

Already we are seeing this way of life destroyed. Lovely established gardens either completely destroyed and replaced with multi-storey units or now completely overshadowed and overlooked by adjacent high-density developments along the entire boundary. With the potential to have 12 metre building along the full length of 3 sides of a property (4, if it is a back section) it would be like living in a prison courtyard.

Those developers have demonstrated time and time again that they have no vested interest at all in the neighbourhoods other than buying up land, stripping it of all of the trees, erecting as many units on it as they can possibly jam in, "landscaping" the minimum amount of land that they are able to get away with, and smothering what remaining land is left with cement, asphalt or other forms of impervious paving, none of which is good for the environment.

We strongly object to the development of areas of Papanui where families have traditionally lived in single dwellings on a section, enabling them to walk to school and have some outdoor space for their children. Large residential development in these areas will not attract families and will instead force them further out of the area and into their cars to access the school. It is absurd to have a section where development above 12 metres is allowed next door to a residential zoned section where a family is living (as is the case with Papanui Street for example).

Congestion - poor and worsening traffic flow

16 comments

A moderate number of respondents commented on the existing areas of the city that are suffering from traffic congestion and that this will be exacerbated by increased intensification. Most of these comments identified specific examples of congestion in particular areas, with examples distributed cross the city, such as these two:

This street has families with young children that chose the area for its safety and quiet nature. Intensification will increase traffic, risk, noise and safety of current residents.

The Barrington St, Stourbridge intersection by Barrington Mall is already congested with cars trying to turn into the mall, buses trying to pull out and cars turning into Stourbridge or the petrol station, more cars is just asking

for accidents. The amount of near misses I have seen is crazy, more cars because of more residents is going to cause a major accident.

Impact on established tree areas (Riccarton Bush, Papanui Memorial) 16 comments

Respondents commented on the environment from a number of different perspectives. These comments focused on the impacts on established areas of trees, particularly Riccarton Bush and Memorial streets of Papanui which between them comprised the majority of these comments.

Riccarton House and Bush made the following comment: note that significantly more detail is provided in the original comment, which is representative of the other comments made regarding this area.

The Board's concerns Pūtaringamotu has exceptionally high ecological and cultural values that housing intensification has the potential to directly impact adversely. These values are clearly recognised through the site having its own Act of Parliament (the Riccarton Bush Act 1914) and by the site being mapped as a Site of Ecological Significance in the Christchurch District Plan (Plan). The site also meets Section 6(b), 6(c) and 6(e) criteria in the RMA (see below).

While any housing intensification will not take place within Pūtaringamotu, the scale and extent of such intensification, in such close proximity, raises the following concerns:

1.1 Ground disturbance associated with building 3-6 story buildings adjacent to Pūtaringamotu.... 1.2 Loss of greenspace adjacent to Pūtaringamotu through increasing site coverage and reducing the minimum site size. With intensification it is proposed to increase site coverage from a maximum of 35% to 50%, and to reduce minimum lots sizes from 450 m2 to 400 m2. In addition, the intensification rules suggest that the area of green space only needs to be 20% of the site. In total this will have adverse impacts on Pūtaringamotu in several ways... 1.3 Erection of large buildings adjacent to Pūtaringamotu altering local microclimates. ... 1.4 Reverse sensitivity effects towards Pūtaringamotu.

This comment is representative of the comments made regarding memorial streets in Papanui.

There are a number of heritage and dedicated memorial streets in Papanui that are simply not suitable for this level of intensification. These include Perry Street, St James Ave, Paparoa Street and Rayburn Avenue. Special consideration must be given to these existing heritage areas to retain their character.

The following comment represents more broadly held concerns for ecosystem protection.

New significant information has come to hand in that The United Nations have declared that 2021 to 2030 is to be the decade of ecosystem restoration propagating native trees in urban neighbourhoods...this for the protection and revival of the ecosystem...this goes against the mandated six story blocks. What would happen to our birdlife which is plentiful and gardens that produce the much needed bees etc. All would be lost as there would be no gardens lawns or trees.

Housing and neighbourhood aesthetics, and overall amenity 16 comments

A moderate number of respondents objected to the proposed changes because of the anticipated impacts on proposed housing and neighborhood aesthetics and overall amenity. A number of these respondents objected to the creation of a concrete jungle. The following comments are representative of these.

We question whether Christchurch needs this level of intensification and would prefer a more human scale to suit the topography and layout of the city, including the central core where the current district plan requirements seem more than adequate.

If these new plans are put in place I think Christchurch will become an unattractive, poorly planned concrete jungle with no respite. It is certainly not the future we envisioned for our children and grandchildren.

The Board is opposed to a building height increase beyond 12 metres in areas other than the City Centre. It considers development up to 20 metres (six storeys) to be inappropriate for Town Centres including North Halswell, Church Corner and will be totally at odds with the character of these areas.

Council response to government approach

13 comments

Several respondents focused on the response that Council should take to the Government's Statement on Urban Development. These respondents objected to what the Government has proposed and urged Council to reject it. Overall, some of these comments were critical of the Council going beyond what is required and proposed taking a minimal approach, as is described in this comment.

CCC should do nothing but the bare minimum to satisfy the legislation. Anything more is inconsistent with other decisions and imperatives.

Oppose changes to recession planes, specific for Christchurch

13 comments

These comments focused on the details of changes to recession planes and expressed the opinion that the changes will have negative impacts for neighbours. This comment expressed criticism by articulating what the respondent felt the outcomes would be from changes.

Buildings on sections orientated east - west which now get sun from the north will lose much of their sun if a 12+ metre house is built on the section to the north. The new recession plane guide of 60 degrees from 4 metres (at twice the height of a standard paling fence) will shade most of the daily sun if a house is placed 1 metre from the fence line to the north, especially in winter.

The point was made by a few respondents that impacts are greater in Christchurch than more northern cities because of the angle of the sun in winter.

Mid-winter sun is lower in the sky at 23 degrees in Christchurch than at 30 degrees in Auckland. That difference continues through the year. The Act's dimensional requirements, including recession planes, are oddly the same for Auckland and Christchurch, hence the shading outcome from the sun sitting lower above the Christchurch horizon gives much greater shading and is more detrimental to Christchurch residents (who in fact need sunlight more given the cooler climate)! Adopting current CCC recession planes, tailored to the city, would at least rectify this shading inequity for those parts of buildings above 11m high.

Retention of 'garden city' or trees generally

12 comments

Several respondents made the point that the approach is not in keeping with Christchurch, with some of these comments specifically focusing on the inconsistency of the proposal and the traditional image of Christchurch as the 'garden city'. These are a couple of representative comments.

More than enough business intensification is provided for in the proposal – and it could be reduced in some of the local centres – again a more human scale of up to four storeys would be more appropriate for Christchurch.

More consideration should be given to retaining a green canopy - rather than just a provision for outside 'green' space. Christchurch is supposed to be the Garden City but this is under threat from developers who completely strip any sign of life from a section before they begin building. Allowing the removal of existing tree canopy not only changes the look and feel of a neighbourhood but increases hard surfaces - impacting run off and flooding potential.

Lack of on-street parking

11 comments

Similar to the congestion discussion above, respondents felt that an already bad situation will be exacerbated in some areas as a result of increased intensification. These respondents expressed that it is already difficult to find on-street parking or navigate streets because of the amount of cars parked and they felt that greater intensification will exacerbate this issue. This was a representative comment.

Parking, at times, is already an issue. This will be compounded by intensification.

Privacy loss

9 comments

Several respondents rejected the proposed plan because of the predicted loss of privacy perceived to be a result of tall buildings. This was one of the comments, which represented the sentiment of the majority on this topic.

No, it makes sense to have tall buildings in the central city but not in Halswell and Shirley etc. It's totally unnecessary. Nobody wants to have their neighbours peering into their bedroom window.

Noise impacts

9 comments

Several respondents made the point that noise will have a negative impact on neighbours; the following comment is typical of these.

Bishopdale being on the proposal is going to ruin the peaceful nature of the suburb. We don't need medium or high-density housing everywhere, like don't spread it out! Make the city the central focus like they do elsewhere and leave the suburbs for those who want some peace, quiet and space!

Three waters infrastructure

9 comments

Infrastructure was an issue for some respondents with three waters being the most commonly discussed. This respondent raised a common concern.

Infrastructure - We have little information about the wastewater infrastructure in this area, although we do see it sometimes not coping with its current load, can we afford to add more load?

Single storeys being dwarfed, loss of ambience

8 comments

The general loss of ambience due to tall buildings being built next to smaller buildings was another concern for respondents. This comment was more detailed than most in this section, it broadly articulates the arguments of many.

12 meters is too high. Established properties will be dwarfed by the adjacent new property. The light levels will cause significant issues for some properties, impacting the quality of living for these residents that are not willing to sell up and lose their homes. It will completely change the character of these areas, not only the buildings but also the surrounding landscapes.

Inconsistent with post-earthquake planning

8 comments

Several respondents discussed how the proposed approach is inconsistent with the Christchurch's post-earthquake urban planning. The point was made that Christchurch does not have an undersupply of vacant land like Wellington and Auckland and that the city's circumstances are different. The point was also made that the people of Christchurch invested significant thought and effort in articulating its one development trajectory following the earthquake and this should be followed through. People did not appreciate significant divergence from this plan. This comment articulated the sentiment in a number of these comments.

The people of Christchurch are still trying to build what we wanted and what CCC said they would build post-quake. CCC should continue with this plan and utilise the land already zoned and identified for residential housing, rather than taking an aggressive approach of intensifying neighbourhoods that do not need intensification. Why is the land identified in the Christchurch Recovery Plan 2014 to the South of the CBD (the Southern Frame and then through to Moorhouse Ave) not being used as planned to include residential development? We actually have the challenge of too much land in the Central City, and its empty and being wasted. On the Southern side of the CBD we have cars driving through parked cars and car yards. I'm pretty sure this is what the Council didn't want, and yet this remains a city of cars and more cars wasting apparently valuable land. Here's what Council said in 2014 in the recovery plan relating to the Southern Frame.

Additionally, some respondents focused on the issue of height and that Christchurch people specifically articulated the desire for a low-rise city post the earthquake. This was one comment.

Post earthquake there was considerable time and money devoted to public consultation on the Christchurch rebuild, including the safety of buildings and the physical and mental well-being of residents. We thought we had been listened to when it was decided that new commercial buildings would have a height limit of four storeys.

Off-street parking and garage space issues

7 comments

Further to the on-street parking discussion above, these respondents identified the need for greater off-street parking to reduce the street impacts of greater intensification, but also to provide storage space in small residential building for the equipment (bikes, kayaks) that modern lifestyles often attract. The following two comments covered both of these points.

Provision should be enforced for at least one car park per dwelling. There is potentially not enough on-street parking for the number of vehicles that will 'belong' to one development. I appreciate the idea is to reduce car ownership and create a shift to other forms of transport but this is not likely to happen any time soon in Christchurch due to a limited public transport system and a reliability on car ownership. Even with all the best intentions a Christchurch citizen would be hard pushed to not own a car even if this is for only occasional use and not a daily commute.

With respect to there being no requirement for parking on site or even garaging, I wonder how it is proposed to accommodate Kiwis' liking for heading to the beach with a surfboard, to the mountains with skis or to the hills with a backpack, if there is no provision for cars. Christchurch (or anywhere in NZ for that matter), unlike many overseas cities, is not so far from sea and mountains that people wouldn't consider going there for an afternoon. I'm sure if you lived in a central USA city or even London, the thought of heading to the beach or the mountains for the afternoon would be unthinkable.

Developers' impact on aesthetic and liveability - profit ahead of quality

7 comments

Concerns were expressed that developments would lead to poor outcomes as a result of developers being overly profit driven. The point was also made in these comments that once areas have been impacted it will not be possible to reverse the change. The following example was provided.

A good example is the property on the corner of Titoki and Rimu Streets (7 Titoki St). At present there is an old house in disrepair on what is a very large section. That property would be ripe for a developer to purchase at some point, to demolish the house and build a 6 storey apartment block (under the proposed changes). Such a building would be directly opposite Riccarton Bush and would be horrendously out of place there. It is currently an attractive residential area with a large public open green space across the road. A 6 storey development would create unwanted shading, bring increased parking issues, noise from multiple residents, and generally detract from the peaceful urban setting. The same can be said of all the streets I have mentioned in that area near Riccarton Bush. Make no mistake - property developers are not interested in maintaining the aesthetics of an area - their motivation is profit and nothing more. A series of apartment blocks will totally ruin the area, and actually discourage people from wanting to live there.

Property market impacts

7 comments

A small number of respondents expressed concern for the impact on the property market. Some articulated that the changes will not actually increase opportunities for home ownership for those on a lower income but will instead increase profit opportunities for developers and short-term and long-term landlords. This was one of the comments.

The directive by the Government for massive infill housing has not and will not solve the problem of affordable housing for those wishing to purchase a home. It will lessen the opportunity for people wishing to buy an existing home in an affordable area as developers will now target those areas.

Data and projections underpinning the process

7 comments

A small number of respondents were critical of the data and projections which underpinned the modelling of future housing demand, in particular. This comment outlines one proposed calculation of the supply and demand of housing if the Plan is actioned.

If PC14 were to be fully implemented, 5 million people could be living in Christchurch City. Christchurch currently has a population of 384,000. Statistics NZ predicts the population will grow to 443,000 by 2038 that is an increase of 15% or 3.7% per annum. If on the other hand CCC were to scale down this Draft for intensification to accommodate twice the number of those expected to live in Christchurch City by 2038 i.e., by 7.4% or 7,400 people, the city would still be meeting government's expectations and producing housing of high-quality design.

Catchment sizes and distances

7 comments

While a moderate number of respondents sought increases to the 12m development area, these respondents were in favour of decreasing 12m zones. These comments were aligned with the desire for the Council to propose the bare minimum in implementing the Governments' NPS-UD. This was one of the comments.

Expanding the "walkability catchment" further than it needs to be and further than appropriate for Christchurch is another example of going too far. In particular, Victoria Street should not be considered part of the Central Core. Additional points: The CCC agreed when developing the Local Alcohol Policy that Victoria Street should not be treated the same as the City Centre. It was only after a few bars on Victoria Street refused to compromise that the Council reduced the exemption to the area between Peterborough Street and Bealey Avenue.

Incompatibility (height) within neighbourhoods

7 comments

Similar to topics discussed above which identified loss of privacy and neighbours being dwarfed, these comments made the point that high buildings would be incompatible with existing buildings in established areas. The following comment makes the point.

A goal of achieving coherent urban form in the wider Riccarton area should take into account the disadvantages that would arise. In our case, the development of 6 storey buildings will make the properties surrounding such buildings less attractive and the increased population will put further pressure on parking, traffic congestion etc. Urban form should support a diverse and connected neighbourhood where people want to live, not just pass through.

Anti-social behaviour, reduced safety

6 comments

A small number of respondents commenting on appropriate areas to develop to heights above 12m objected overall to the approach because of the links they identified to anti-social behaviour and reduced safety. This was one of the comments which articulated points made by other respondents also regarding on-street and in-home crime.

Crime - we have seen an increase in recent months of car windows being smashed and car contents being stolen, and have had personal experience of this. With increased on-road parking this type of crime will increase. We have also seen over the last few years that the area south of Riccarton Rd, which has higher density housing, has a much higher crime rate with almost nightly reporting to the Police of house break-ins, car thefts and car damage. With a large number of young families in the area north of Riccarton Rd, this is something we do not want to see.

Planning approach and rules

6 comments

A small number of respondents considered the planning approach and generally articulated that a more fine-grained approach is required. This comment used the example of Hornby to detail what is required. A couple of specific points were made recommending particular planning rules.

I do approve of the CCC intention to reduce the carbon footprint by encouraging more intensive housing close to transport and retail hubs. However to imply that there is a need for it in Hornby is silly when you look at the planning disaster that has got Hornby to where it is. Hornby is situated in the middle of an industrial area that is all about moving goods. This needs to be acknowledged. Unless there is a huge change in the Council's commitment to making sure that public transport links are up and running, a hard rail corridor is coming soon, that park and ride areas are being planned, that zebra crossings or over-bridges are constructed and wide family friendly footpaths are being built everywhere, we do not need an increased population density in the area. At the moment new housing areas are not linked properly with walkways and cycle ways, and walking or cycling around our Hornby business/retail hub is often scary and always unpleasant. Tree cover in this area is scanty and new plantings are often inappropriate to the soil type and water availability. Its noisy and windswept.

It is the height of stupidity to give developers the impression that they can and should cram 3 and 4 story properties on to existing sections willy-nilly within the high-density zone. Already prices of properties on decent sized sections in the surrounding area are rising, and I suspect that land banking is on the increase. High density in the area needs to be limited to well planned and landscaped developments that are sustainably

built, energy efficient, properly spaced to give everybody privacy, access to sunlight, open air and community space, and allow secure affordable tenancy.

Public transport

5 comments

A small number of comments made points on public transport with the most consistent theme in this topic being the need to improve public transport infrastructure.

We understand the need to allow a level of intensification to discourage the waste of land that has happened through recent housing developments and we expect this will also go hand in hand with a much more efficient and cost effective public transport system for the area.

Housing and neighbourhood functionality

5 comments

Similar to the topic entitled liveability, these comments focused on the need to appropriately place housing amongst its surrounds. This was one of the comments.

Almost everywhere that new high rise residential development occurs (except in the centre of major cities typically with populations in the millions) it is enabled in large areas of largely vacant land so that all the infrastructure and natural outdoor amenities can be planned alongside the future development. Although buildings may be high, the land use ratio falls dramatically; large areas of useful outdoor open space are planned and created to ensure a liveable environment.

Comment on the government's approach

4 comments

A small number of respondents focused criticism on the government's approach to urban development. In particular they expressed the changes have gone beyond what is required for Christchurch, and that a very blunt instrument is being used to solve a problem in a complex environment.

The Government's Policy Statement on Urban development is a blunt instrument and does not overlay well in Christchurch. Suburbs within 10-20 mins walk of the CBD, particularly older, more established suburbs, should not be caught up in such (vertical) intensification. The result will be a significant loss of established green canopy, amenity value essential for healthy homes and healthy inhabitants (sunlight, ability to grow food etc.), and overburdened infrastructure, and all on mainly TC2 land that is typically between 1 - 3 meters above sea level (based on 2020 stats.) (Where is the connected thinking with other major issues facing our communities?).

Gardens, or trees impacted (impacting growth)

4 comments

A small number of respondents were concerned about the impacts of the changes on gardens and trees. This respondent expressed concern over not being able to grow a vegetable garden.

The PC 14 proposal enables building heights that exceed those mandated in the legislation. The proposed building heights will produce shading effects in Christchurch homes that are damaging to residents' health and wellbeing; residents will have no ability to establish their own food gardens because of this shading. Christchurch homes will need to use substantially more energy for heating - probably all year round - because of this shading.

Provide trees, canopy, parks, recreation, public spaces

4 comments

These comments were critical of impacts on public spaces and amenity from developments. This was one of the comments.

If the Draft Plan goes ahead in its current form, the character of neighbourhoods will be erased along with their history and perhaps most critically, natural amenity will be destroyed, i.e., they will be stripped bare of trees to make way for housing. There should be a far more balanced relationship between trees, green space and housing. Trees should be peppered throughout our streets and between our homes, not banished to isolated "islands" in public parks, particularly when the Council stated in the submission to the Government Environmental Select Committee in 2021 that there is simply not enough public land in Christchurch for the city to plant trees on in order to achieve a sufficient tree canopy cover.

Consenting requirements

4 comments

A small number of respondents sought the retention of the requirement for consents to control some levels of development. The point was made that rules are being unfairly changed. This was one of the comments.

Suburban areas should not be the target for this type of housing. There still should be consent. There still should be accountability and with the current proposed changes developers can do as they like. It is not respectful of others next to a property where this height of house could go up and majorly impact their day to day living!!

Process information to consider, definition of term, this and next plan version 4 comments

A small number of respondents focused on the information that had been provided to inform the development of the Plan and/or the engagement process. Some sought a better iteration of the Plan in the next version and others identified inconsistencies with the current Plan. This is an example of someone questioning the details of the Plan.

There also seems to be an inconsistency in the Consultation Document: page 11 refers to a 10-minute walkability catchment for increased height of 32m; page 14 says 15minutes for what seems to be the same or similar proposal. My understanding is that the MftE's guidance for areas similar to Victoria Street is a 10-minute parameter.

Variety of topics

33 comments

A large number of points were raised three or fewer times, specifically focused on the development of areas above 12m. These points are briefly described in this discussion. The brackets contain the number of respondents who made each point:

- > **Devalue homes (3):** these respondents criticised new high-rise buildings decreasing the value of neighbouring property.
- > **Flooding (3):** respondents identified surface flooding as an issue in specific areas.
- > **Climate change impacts (3):** was identified as an issue, in particular preserving trees and planning a sustainable city.
- > **Travel demand and reliance on vehicles (3):** respondents made points similar to those under traffic congestion but with a focus on the traffic demand that will be generated from increased intensification.
- > **Active transport and Pedestrianisation (3):** comments discussed the need to consider provision for active transport and routes.
- > **Community engagement – future development (3):** respondents requested greater input from communities into planning process to increase buy-in and better outcomes.
- > **Electric car charging issues (2):** Two respondents identified that it will be difficult to charge vehicles if onsite parking requirements are removed as vehicle owners homes will be potentially a long way from where they park their vehicle.
- > **Roading and other transport provision issues (2):** respondents identified roading issues, such as clogged small streets.

The following points were made by a single respondent each: solar panels will be shaded by high buildings; views will be blocked by tall neighbouring buildings; areas will devalue in the future because of low-standard developments; concern regarding developers not taking appropriate environmental care during construction; older trees need to be added to schedule of significant trees; concern over there not being enough energy capacity in older areas such as Barrington; impacts on trees and amenity will outweigh housing benefits in some areas; housing aesthetics will be diminished; with the housing types built be appropriate for the purpose they are serving (for example building for elderly); concern for ground disturbance during construction; the central city zone is arbitrarily too large; will individuals be compensated for property value loss?

This was one of the most consistently made individual points across all of the feedback. A sizeable number of respondents consistently made the point that development above 12m should be restricted to the central city or at least should occur in the central city prior to development moving to the suburbs. Two prongs of this argument were that central city development will protect the suburbs from over-development and at the same time the central city will be able to compete against development that has already occurred in the suburbs, and if allowed will increase in the future. This comment generally covered this argument.

Inner city intensification - there are still swathes of land in the inner city which are lying bare, and should be the preferential site for intensification, rather than the suburbs. People choose to live in the suburbs for a particular lifestyle, enjoying the amenities that are available, and mixing with all types of people, of all ages in their communities. Lower density housing facilitates this by allowing easy neighbourly interactions. The inner city and brownfields are the place for intensification.

Related benefits from this approach were also discussed, such as reduced need for providing public transport to suburbs.

I believe that the council should concentrate on providing incentives for business to return to the central city before encouraging any more in the suburbs. For many of us the central city is nearly irrelevant as most businesses we use are in the suburbs. The council will need to concentrate on increasing the density of housing in the Central city before degrading the residential suburbs even if they are near to Riccarton or other main roads. Any move to increase intensification should be done after the city centre has a plan and is underway then and only then begin a staged intensification which takes a community centred approach rather than a blanket approach.

This comment explained the benefits of developing the central city and the challenges of suburban development.

Intense residential development should be considered for areas such as the central city where fledgling and recovering businesses would benefit from additional resident consumers. Enabling people to live and work in the central city won't contribute to the ever-increasing traffic congestion. The recently built central city should already have infrastructure capacity, whereas the historic streets of Barrington are using the power, water and drainage to the capacity they were designed for.

This comment contains this respondent's opinion of why people prefer central city development in Christchurch, over suburban development.

Christchurch is not New York. People are moving here from Auckland to escape the rat race up there. No one wants a 12 metre 3 storey concrete "flats" next door to them. The comment that we need 50,000 houses for the future is just rubbish. Christchurch is such a lovely city (I'm a Wellingtonian). Don't ruin it and turn it into a concrete jungle. Build up in the CBD only.

This comment proposed residential development in the central city, over commercial development.

Use the empty core to develop residential housing by zoning it so that buildings will be built to a high quality and high aesthetic to protect Christchurch's beauty; control and be deliberate in this rather than liberally spraying the entirety of Christchurch city with random 6, 10, 32 (whatever) storey buildings. Obviously no one wants to build commercial in the core so use this 40 hectares of empty land for residential. It seems such an obvious solution. Hell you might even start a trend.

This comment described the historic context of suburban development and why it should be reversed.

The reason we have a large commercial centre in Riccarton so close to the central city is that before the 1989 amalgamation the Riccarton Borough Council rezoned a sizeable amount of land commercial. It is unusual to have a large commercial centre so close to the Central City. Council needs to protect the central city which should be where apartment living is permitted, and encouraged. Any building more than three stories high should be central city. Council needs to bring in rules to achieve this.

Others felt that the central city zone is too large, for example it shouldn't include Victoria Street. The following point succinctly articulated this.

Why hasn't the CCC considered the CBD to be The Core as defined by the 2014 Recovery Plan? CCC keeps changing the definitions of CBD and Central City areas to suit their needs. Plan Change 14 proposal should be drawn from the borders of The Core i.e., the CBD to determine appropriate boundaries to meet the requirements of the Government's legislation. Victoria Street can't be CBD when the gateway to the city is clearly indicated as being at the entrance to Victoria Square on the corner of Durham St North and Kilmore Streets.

SEISMIC RISKS - LAND NOT SUITABLE

19 COMMENTS

A moderate number of respondents cautioned development above 12m due to the risk that land in Christchurch poses, specifically the risk of damage to buildings during large seismic events. These comments frequently made detailed reference to the destruction that occurred during the Christchurch earthquakes, along with the likelihood of the Alpine Fault rupturing in the future. There were very clear and direct points made in these relatively detailed comments, of which the following three are examples.

I don't think any area of Christchurch, or close surrounding areas, should be anything above 12 metres - We had a devastating earthquake and people died - and you want to risk that again?? It is not fair on the people of Christchurch, and it certainly isn't a safe option.

Restrictions on the height of new builds were introduced post earthquake when some 80% of the buildings within the CBD either collapsed or were damaged beyond economic repair. 10 000 residential homes were demolished due to liquefaction of the land their home was built upon, causing irreparable structural damage.

Science suggests the Alpine Fault could rupture in the near future. Multi-unit dwellings are costly, time consuming and difficult to repair. Is suburban land appropriate to build to the heights set in the draft plan? Has any consideration been given to the consequences of a 12m or 20m high suburban building collapse due to liquefaction of the land?

Most people living in the central city accept the need for greater intensification / more people living in the central city. They also realise that there are now a lot of givens, legislated by central government that the Council must follow. What we don't understand is why the Council are proposing intensification criteria that are in excess of those required by Government. It would seem that policy makers have quickly forgotten the folly of constructing tall buildings on a swamp (central Christchurch), made obvious by the destruction caused by the 2010-2011 earthquakes. The quality (and safety) of the lived environment now appears to take a distant second place to the quantity of dwellings.

NOT IN KEEPING WITH CHRISTCHURCH

10 COMMENTS

Several respondents made the point that this level of development is not in keeping with Christchurch and its historical development, these comments were additional to those which criticised the level of development for being inconsistent with Christchurch's reputation as the 'garden city'. An underlying point was that what is appropriate for Auckland and Wellington isn't necessarily appropriate for Christchurch. This was one of the comments.

Not necessary in Christchurch. We have so much land that could be made available that negates the need for heights needing to be so much higher.

The following respondent's comment describes characteristic urban form and Christchurch lifestyles which they claim the planned approach is inconsistent with.

The Central City, Riccarton, Linwood, and Sydenham are the only areas of the city which would be suitable to go up to 12 metres. Christchurch is still a very low-rise city and if it all went to two storey that would be considerable intensification but still allow gardens to maintain the Garden City image. People are also turning back to vegetable growing so need space and sunlight to achieve productive plots.

This was another short comment which articulated the sentiment of these comments.

This is ridiculous, suburban Christchurch does not need this over housing problem we are not Auckland.

DEVELOP VACANT LAND

9 COMMENTS

Several respondents stated their preference to develop vacant land before suburban areas are developed. They were in the same vein as those which recommended development of the central city over suburban areas. The point was made that there is significant development capacity in existing vacant land. This was one of the comments.

The 1.5m setback is also almost meaningless when compared to the effects of a 12m building. How much of the stated future 50000 housing shortage can be solved by adding taller multi storey apartments within the huge amount of vacant land in the 4 Aves? What proposals are there to force intensification of this vacant land (where it should be happening)?

One respondent questioned why the red zone can't be developed.

Thank you for your letter regarding zone change to Sydenham commercial zone to residential. Sounds a pretty unappealing place to live. What about getting the red zone to the east of Chch up and running again? This would be a much better place to live.

ALREADY A BUSY AREA

5 COMMENTS

A small number of respondents made the point that areas identified for development are already busy, specifically Riccarton and Merivale. These comments focused on traffic impacts. The comment below describes anticipated impacts of development on Merivale.

In Merivale this is unsuitable due to: A high proportion of conventional housing which will suffer extreme light and claustrophobic deprivation. Street parking in St Albans Street is already under big pressure. We have only one park on our property and often have to walk 150m to park on the street. It being a leafy suburb adding to the quality of life for which existing residents have paid a premium. Rateable values falling as existing property prices falling. Retirees in existing houses wanting to downstate to provide retirement funds will be disadvantaged. Traffic congestion on Papanui Rd is already severe. Character of the area adds to the overall attractiveness of Christchurch to visitors.

RESTRICT TO NEW SUBDIVISIONS

4 COMMENTS

A small number of respondents opposed development within existing suburbs and instead preferred development being restricted to new subdivisions. This was one comment which summed up the argument.

I do not support high density housing in established suburban areas where sewer, roads and neighbours are to be highly impacted. Why not do it in new residential areas where these issues can be planned for.

OTHER REDUCE DEVELOPMENT COMMENTS

9 COMMENTS

Several one-off points were made regarding reducing development of areas above 12m.

These included: detailed direction on what level of development should be allowed in particular coloured areas of the Draft Interactive Zoning Map provided by CCC, and the result would be significant reduction of development (for example removing Victoria St from the central city); there should be not too many hubs that are developed too quickly; most Christchurch builders are too small for multi-story and will take a decade to upscale; neighbour conflict needs to be minimised during this time by minimising the areas involved; Church Corner should be a local centre, like Bishopdale (it is not big enough, and is too close to Riccarton to be considered a town centre); prior to the earthquakes Christchurch Central was a dismal, windy, shady area in parts, we now have the opportunity to develop and grow a pleasant, inviting place for citizens to gather and to attend to their business needs; and, lastly, making the central point that the Plan should guide the market to deliver the outcome desired by the Plan, only if the re-zoning is carried out progressively (rather than all at once over a much wider area than is immediately necessary) is this likely to happen.

Increase development above 12 metres

comments

66

Note there are comments focussed specifically on greater development of the central city as a priority in the central city section (section 3, page 42).

AREAS RECOMMENDED TO ADD TO CURRENT PROPOSAL

29 COMMENTS

A considerable number of respondents who supported the development of areas above 12m recommended other specific places or areas they deem suitable for development. Around half of these respondents generally supported more areas being developed to greater height by making comments in support of more areas being developed or by stating that all of the city should be developed. This was a typical comment.

I would include a lot more areas, even large empty lots of land so gives the ability for future mini metro areas.

The remaining comments were specific and identified either a particular lot or a particular area that respondents felt should be developed more, these included: Church Corner, University, should be developed more; Wigram, there is evidence of demand nearer commercial centres; the existing areas zoned for intensification (RSDT or RMD etc.) were previously selected for development and should be included in greater development – such as Spreydon, Sydenham, Linwood, Woolston, etc.; Garnett Avenue add to Barrington; higher density in the immediate vicinity of smaller shopping centres (such as Woolston or Edgware for example); Avonhead Mall; Sumner; New Brighton; more areas north of the city; from Tuam to Moorhouse should be included in the central city area and the catchment zone expanded accordingly; and, Woolston Village.

Specific lots were: a couple of respondents discussed specific sites near Church Corner Town Centre - Lot 9 DP 2470 and 40 Main South Road, Lot 9 DP 2470; 120 Peverel Street – clarification if sought; Lot 1 DP471475, Lot 3 DP17794 and Lot 1 DP491986 (60 Croziers Road); and Ryman's site at 78 Park Terrace; Westholme St – Waimairi; requests that the sites at 37 - 49 Bangor Street (currently proposed as HDR) be zoned CCMU. CCMU Zone: 15.12.1.3 RD3 - amend matters of discretion or clarify which built form standards apply to retirement villages,

ENLARGE 'CENTRE' ZONES, INCREASE HEIGHTS

20 COMMENTS

A moderate number of respondents suggested either increasing the area of centres or increasing the heights that can be built to in those areas. These comments were similar to the section above and there were overlaps but the difference with these was that they were primarily focused on expanding the current provisions in geographic area and/or height, rather than adding particular areas or adding specific sites to particular areas. These are a couple of generic comments from respondents.

Some of them are too small. Any long-term plan that makes a serious effort to combat GHG emissions will require the city design to have Emerging Metropolitan Centres and Town Centres that cater for around 30,000 residents within walking distance of the centre. Using say 500 metres as "walking" distance the proposed zones are too small. My local centre at Riccarton is a good example of this. The plan is not ambitious enough in the area that it allows for high- density housing.

We support the reclassification of the Town Centres emerging as Metropolitan Centre into Metropolitan Centres with a larger walkable catchment and more height allowed.

Additional to around one third of these comments which generally stated increasing the size of zones, of catchments, or heights generally, the specific points below were also made. Often these points were supported by detailed arguments which are contained in the full text of responses. Note that nearly all of these comments are made by a single respondent, the comments start with broad statements and then comments which focus on particular areas are listed:

- > The areas for development above 12 metres are located within the walkable catchments around the different centres. Christchurch City Council isn't going far enough with the walking catchment for two main reasons: Firstly because the catchment are not wide enough, and secondly because they haven't proposed walkable catchments around the existing main bus routes.

- > Increase commercial mixed-use zones in the central city and nearly everywhere.
- > Recommended that walking catchments for suburban centres extended from 5 minutes to 10 minutes linked to increasing better pedestrian access for places such as the Palms and Eastgate to facilitate less vehicle use. This respondent also recommended quality public amenities (parks with facilities) in close walking distance of these areas, more so than tree requirements on private properties.
- > Outside of the 4 Aves one respondent supported a donut of medium high residential, and along corridors and existing commercial centres.
- > One respondent supported the 1.2km size for the city centre walkable catchment. However, they believe the catchment is calculated from the incorrect boundary. Instead of basing the catchment off access to the city centre zone, it should also be based off access to adjoining sections of the Commercial Central City Mixed Use (CCCMU) zone. In practice this would mean pushing the starting point of the walkable catchment from Tuam St to Moorhouse Ave (as one example).
- > One respondent supported the approach taken to the proposed 400m walkable catchments for town and significant local centres. They did not support the approach taken for the 200m catchments for larger local centres. This would be a 2.5 minute walk, which is not consistent with objective 3(a) of the NPS-UD.
- > In keeping with the provisions of the District Plan, one respondent considered the increase in the height of Town Centres should be commensurate with a commercial centre's status relative to other centres and to support the development of a legible urban form with commercial centres having greater height than the residential areas surrounding them. An increase to the maximum building height is supported by amended Policy 15.2.4.1: Provide for development of a scale and design that supports a legible urban form and contributes to the city skyline. The stated that the height limit in Rule 15.4.2.2 should be increased to 50m.
- > CCMU Zone: Maximum building height of 22m as a permitted activity and 22m – 32m as a restricted discretionary activity. HDR Zone (where within 1.2km of City Centre zone): Maximum building height of 20m as a permitted activity and 20m – 32m as a restricted discretionary activity. Remove 'secondary' restricted discretionary activities.
- > In line with this Policy, the permitted height limit for the High Density Residential Zone should be 20m. The requirement to obtain a resource consent should only apply to developments which exceed 20m in height.
- > Barrington: Barrington Park, Garnett Ave, Sugden etc. where a 5 min walk (the qualifying catchment) will have people at the mall's doorstep, yet they are not zoned a local centre zone. Some that are zoned local centre zone are a greater distance away and a more tortuous path, yet receive this beneficial zoning...its inequitable and inconsistent.
- > The walkable catchment for Linwood should be extended past Stanmore Road as this is not only within easy walking distance to the city, but Stanmore Road also has multiple bus routes. It is also within easy walking distance to suburban commercial areas (Linwood Village, Eastgate, Richmond and Eastgate), has good access to services, schools and shops and is connected to walking and cycling networks, meeting most Government directives of the National Policy Statement on Urban Development.
- > One property business sought Plan Change 14 to rezone the Hornby "Commercial Core" area as a "Metropolitan Centre" with a detailed list of arguments provided in their comments.

CONTINUITY WITHIN AREAS

9 COMMENTS

Several respondents made suggestions to alter the boundaries of areas to increase continuity and/or avoid anomalies. Again, these comments were usually in the form of one-off examples. The most frequently discussed area was around Church Corner and Upper Riccarton and these comments have been grouped at the start of the list:

- > 55 Waimairi Road in Upper Riccarton should be included to the High Density Zone, as the property is within the blue dash line.
- > If the high-density residential zone is covered the northern side of Haslett place, the Southern side of the street should be the same because the walking distance from this endless street to the Bush Inn town centre should be the same.
- > The area north of Riccarton Road (Newnham, Rudley, Hanrahan, Rountree, Siska) has the University as a second focus, besides the Church Corner Commercial area; - Between Waimairi and Ilam Roads, the proposed High-Density area should extend to the University, to include Rountree Street and Siska Place. Otherwise the

proposed Medium Density in this area would be a no-mans-land. Better converted to High Density, integrated to university needs.

- > Around Upper Riccarton the catchment stops halfway along Suva St between Hansons Lane and Ballantyne Avenue. It would make more sense to extend this catchment to include the South side of Suva St all the way up to Ballantyne Avenue and possibly increase or decrease the catchment on Roche Avenue. This will reduce the impacts of neighbours within the same street based on development extents possible.
- > One respondent state the high density zones should be larger around the city center and Riccarton. There should be one in Addington. The borders of the zone should follow roads in more structured way. They should follow the cycleways as well e.g. through Riccarton and Upper Riccarton.
- > If the high density residential zone is covered the northern side of Haslett place (Upper Riccarton), the Southern side of the street should be the same. Because the walking distance from this endless street to the bush inn town centre should be the same.
- > Could be more apartments in the south Richmond area for example, only extend to the area immediately neighbouring Fitz Ave. This means they will be inherently less livable and friendly to families etc than if they were located further from busy roads. Extending or moving those options slightly further towards secondary roads e.g. Stanmore would probably increase the desirability of those locations.
- > Re: Barrington Shopping Centre, The Commercial Centre Walking trigger dotted line is drawn in an odd way. It should loosely follow the yellow Intensification zone shown on the map.
- > Avon Loop is supportive of the proposed CCMU zone for the site, and requests that the sites at 37 - 49 Bangor Street (those currently proposed as HDR) also be zoned CCMU, so that the same zone applies to the contiguous land holding. Avon Loop consider that it will enable more efficient site development and reduce zone boundary issues in terms of consenting requirements.

OTHER INCREASE DEVELOPMENT COMMENTS

8 COMMENTS

A small number of other points were made by respondents who generally supported increasing the size of areas or the height of buildings. Many of these responses were quite detailed and specific and Council Offices have the full text. Points are presented in no particular order. This was one direct quote in favour of the market deciding what areas should be developed.

I don't believe you should propose any areas and there should be no ultimate height restrictions. I think the focus should be on mitigating any negative effects and ensuring development is of reasonable quality, which you look to have already done through the conditions such as recession planes, balconies and planting. The market will also act to prevent developments in nonsensical places - no-one will build an apartment in Avonhead because no-one would buy them. And if people do want them there, there probably shouldn't be a height restriction preventing them anyway (that's what pushes up house prices).

Other comments include:

- > One long and detailed response made these main points in support of increased development: 1. Transit Oriented development, and densification along transit corridors; walkable, cyclability and Mixed-Use Development; car free areas, and minimal car usage city; vast amounts of quality apartments and catering to all demographics; beautiful Christchurch with proper planning, density, and green spaces; over coming challenges and NIMBYs, and preventing problems from becoming worse.
- > By allowing greater densification around the main centres of the city, one respondent stated we can long-term increase our city's housing supply in areas that will allow people to be closer to amenities and their workplaces.
- > Greater use should be made of permitted or controlled activity status; and caution should be exercised in the drafting of policies and assessment criteria to ensure such provisions are clear, certain and are ultimately enabling and supportive of intensification.
- > Where buildings are 4 or more floors high, requirements for the size of urban trees (more substantial tree cover and taller planting) should normally be encouraged.
- > Not entirely sure whether the high density residential recession plane requirements apply in the central city, but they seem at odds with what "high density" residential development would require. I would prefer minimal side setbacks and recession planes to enable near-continuous street frontages, to allow for rowhouses, perimeter block housing, etc.

Section 2: Mixed use and business intensification

100 comments

Section summary

Mixed use development

- > A substantial number of respondents supported mixed-use commercial and residential zones. Of these, just over 40 respondents made a short supportive statement via a Generation Zero form.
- > More detailed supportive comments sought increased commercial development, typically including retail or hospitality on the ground floor with residential above. The potential benefits were seen to be activated streetscapes and increased numbers of people on streets that would frequent businesses and add life and vitality to areas. Some felt that the areas of mixed-use development should be increased.

Business intensification

- > Over three quarters of respondents who commented on this topic agreed that the plan change allows for enough business intensification.
- > Consistent with the quantitative result, over half of the respondents who commented on this topic directly stated or implied that there is currently enough or an over-supply of business land. Some also made the point that CBD business development should be prioritised over suburban areas.
 - o Reasons given for an ample or over-supply were business moving to the suburbs and staying there following the earthquakes, and the recent phenomenon of more people working from home.

Changes to mixed-use and business comments

108

SUPPORT MIXED COMMERCIAL AND RESIDENTIAL ZONES

65 COMMENTS

A substantial number of respondents supported mixed-use commercial and residential zones. Of these, just over 40 respondents who provided comment via the Generation Zero form made the following comment:

I support more mixed use (residential and commercial in the same building) developments.

The points made in the remaining 20 comments were quite detailed and consistent in their arguments. There was a desire to increase commercial development by enabling mixed-use developments. This would typically include retail or hospitality on the ground floor with residential above. The benefits were seen to be activated streetscapes and increased numbers of people on streets that would frequent businesses and add life and vitality to areas. Some felt that the areas of mixed-use development should be increased. Below is a selection of comments which capture most of the arguments made.

To improve the vibrancy of the central city more of it should be mixed use. Many buildings should have commercial on bottom, offices or residential on top.

Mixed use development encourages more walking and cycling, and brings residents closer to amenities and services. It is important that we encourage developers to build more mixed use buildings for residents and commercial users. Mixed use development also makes communities safer by facilitating activity at more hours of the day, so as to avoid 'dead zones' or areas with very few people in them.

I do not believe there is a need to differentiate commercial and residential zones, i.e. all current commercial and residential zones should become non-industrial zones. The desire for single-use commercial zones has dropped significantly since 2020 as working from home has skyrocketed. Similarly single-use residential zones are an extremely inefficient way to live and are will forever force us further towards car-dependent, sprawling lifestyles.

Mixed-use commercial and residential development serves to enhance an area so should be encouraged as much as possible.

Other mixed-use zone comments

5 comments

A few other one-off mixed-use comments were made: one comment described fond memories and the popularity of the Milk and Cookie bus prior to moving to Riverside Market and saw this as a template for mixed-use development, they finished with this:

Imagine x100 people living right next to the businesses and supporting them every day with a morning coffee.

The following point was also made:

Sadly and inexplicably, a recent opportunity to meet intensification and heritage goals was lost by allowing the rugby stadium developers to reject the previously agreed-to plans to save the Ng Building by moving it to another site.

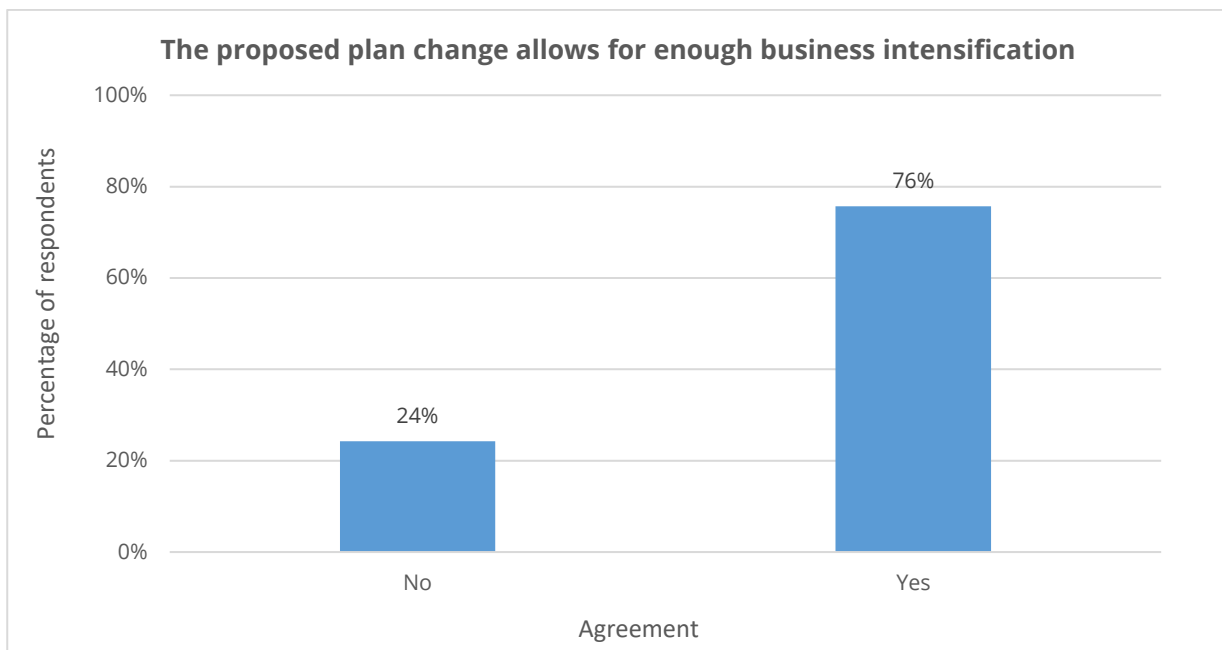
The following respondent called for requirements to meet climate change and sustainability goals.

New commercial buildings in the Central City should be required to build in residential capacity and either roof-top gardens/leisure facilities or solar energy farms from the initial design stage no matter what their height. This requirement would both increase residential capacity, and begin to meet urgent environmental and sustainability targets for the future.

A final comment appears to identify an inconsistency.

Increased business intensification is being encouraged in the Central City, with mixed use buildings. Unfortunately, existing small businesses in the suburbs where there are no malls with large off-street car parks are being sacrificed to bus-lanes and cycleways (by removal of on-street car parks near those businesses).

DOES THE PROPOSED PLAN CHANGE ALLOW FOR ENOUGH BUSINESS INTENSIFICATION?



Results

- > Over three quarters of respondents agreed that the plan change allows for enough business intensification

COMMERCIAL AND INDUSTRIAL DEVELOPMENT COMMENTS DEMAND AND SUPPLY

38 COMMENTS

In addition to the quantitative question asked above, respondents also commented on the demand and supply of commercial and industrial land. Consistent with the result above, over half of the respondents directly stated or implied in their comment that there is currently enough or an over-supply of business land. Some also made the point that CBD business land development should be prioritised over suburban areas. The following two comments are examples of those received.

I work in the central city and pass through two 'satellite' areas immediately adjacent to the CBD on a daily bases. There is a plethora of new build commercial premises available to lease and many empty sites that have yet to be developed post earthquakes. The shift to WFH will continue to impact the demand for commercial office space, as will the continued impact of online shopping and click and collect options on retail and related services. It is folly to allow for further business intensification outside the CBD when the forecasts for the viability of the CBD are concerning. Business intensification needs to stay in the CBD or in established business areas e.g. Riccarton Rd, South City etc. Again, the NPSUD and the CCC's interpretation of it demonstrate that neither is fit for purpose.

I'm not sure if business intensification is necessary as there are already many office spaces and shop spaces standing empty. Some enormous business spaces are still un-developed in the city. I also question the radii shown on the proposed plan.

The following comment explains the respondents' thinking about why there is less demand for commercial development.

Since quakes many businesses moved out of the Central City and since Covid struck most have changed policies and are now allowing staff to work from home at least for a few days in the week. The new norm for office workers continues to adapt to allow more home-based work and more flexible hours, so the kinds of businesses that used to be located in the central city no longer require as much space as in pre-earthquake, pre Covid times. The corollary is that there are many empty spaces and carparks within the Four Avenues that could be used for residential buildings up to six stories.

Other individual points were made that development opportunities in Riccarton have been stymied because of recent upgrades and that development should occur in Belfast.

A small number of respondents stated that there isn't enough provision for commercial and industrial development. The points made were that business development opportunities will encourage more people to move here. The following comment was made.

I am for building a strong and large central business district, as Christchurch's current CBD is too small. Car yards and most industrial industries should move out of the centre city (mainly those within the four avenues and around Sydenham).

Other long or specific comments on individual circumstances or requesting changes to planning conditions were received from a number of large organisations.

Other business development comments

5 comments

The CDHB made the following point on this topic:

...as mentioned previously, the CDHB recommends that the council considers and assesses commercial development opportunities with a 'Health in All Policies' lens and considers the impact of certain commercial enterprises on population health. For example, the health impacts of fast food outlets and off-licenses being developed in neighbourhoods where there is already a number of these businesses present.

One respondent identified the inconsistency in requiring suburban bars to have car parks when drinking and driving is discouraged, and they believe that the free market should prevail in whether car parks are provided or not and businesses should have a choice.

Lastly, one respondent stated the following:

With high density business intensification comes unacceptable noise pollution especially during night hours. We are experiencing this already from neighbouring hotels/apartments and office blocks due to the skips and rubbish collection in the early hours of the morning (most nights) to avoid daytime traffic.

Section 3: Proposed changes to central zone

25 comments

Section summary

- > The point was made not only in this section but also in a number of other sections, that there is a desire for a timed approach to development, beginning in the central city. This was seen as a unique opportunity, different to Auckland and Wellington because the impact of the Christchurch earthquakes has left a large amount of vacant land still available for development in the central city.
- > A consistent argument in these comments was that increasing the number of central city residents will then increase the city's vitality, business opportunities, and safety as a result of more people on streets. The development of the central city was commonly linked with suburban development—the argument was that the central city needs greater development than other areas to be competitive, and a larger population is required to support central city businesses.

While there were comments about the central zone in a number of other sections, in particular the desire for the central city to be developed prior to other areas, these comments focused more on how the central city should be developed.

Develop central city

19 comments

A moderate number of respondents proposed how the central city should be developed. One of the consistent suggestions in these comments was increasing the number of central city residents which would then increase the city's vitality, business opportunities, and safety from having more people on streets. The development of the central city was commonly linked to the development of suburban areas. The sentiment was that the central city needs greater development than other areas to out-compete them and through this, it will have more likelihood of success—higher population is required to support central city businesses. The comment that follows presents a holistic vision for the city, and mirrors points made in a number of different responses.

...we need to take this once in generations opportunity to shape our city for decades to come in a positive way. A strong central city infrastructure supported by a high central city population within easy walking distance is a key foundation to that vision. Supported by suburbs which reflect Christchurch's reputation that supports kaitiakitanga for our whenua/land means we will have a city we will all be proud of.

One approach to increased intensification and vibrancy was to intensify the core of the city.

The long-term vision for Christchurch should be the starting point, including a more condensed "Core" (rather than encouraging greater spread of taller and more intensified development buildings well outside the CBD). Greater development to encourage vibrancy

This comment promoted providing incentives for businesses to locate in the central city.

Any other comments about the proposed plan changes?: I believe that the council should concentrate on providing incentives for business to return to the central city before encouraging any more in the suburbs. For many of us the central city is nearly irrelevant as most businesses we use are in the suburbs.

A number of other respondents stated that the population of the central city needs to grow to be successful, with 50,000 and 20,000 central city residents suggested. To achieve this, respondents commonly recommended that Council enable and encourage higher residential buildings. This was one of the comments.

I agree for the height limit removal for the CBD. This will attract more development in the city core as one less restriction to development it also makes for a more lively city and a safer city with more population. At the moment there is nearly zero multi level apartments in our city only two over ten levels that were built before the earthquakes a lot of new housing has been built but usually only two levels so residents don't have a view. We

really need 50,000 residents in the CBD to make it a viable city center and we wont get to that number with just one or two level housing only being built on all the empty sites in the CBD.

Some comments were quite specific, such as this one which considered the cities environment and setting.

Buildings on the north sides of public spaces such as City Mall and Cathedral Square should have a max height of 3-4 stories-- no need to go through a consent to establish this!!!

Building heights are a matter of city form and shape-not only wind etc [although this is also a critical matter in ChCh] .What is the form and shape of the City Centre you are seeking to create?

Limit Central city development (also see inconsistent with post EQ Christchurch) comments

4

A small number of comments requested limited central city development, contradicting the section immediately above, but generally in line with the topic of being consistent with Christchurch post-earthquake planning. A couple of respondents referred directly to what was planned and implemented post-earthquakes in terms of a low-rise city. This respondent expressed that higher buildings would be detrimental to the city.

There seems to be a serious danger of making the inner city area very unattractive to current and prospective residents by enabling unnecessarily tall buildings and excessively dense development. You are aiming towards millions more Christchurch residents than could ever be reasonably expected within the lifetimes of the buildings themselves.

The point was also made that suburban development will detract from central city development.

This undermines all the rhetoric and attempts CCC has made to encourage more people to live within the 4 Avenues (including the often-repeated goal of at least 20,000 inner city residents).

Suburban centre zone development will reduce Central development **2 comments**

A couple of respondents made point that suburban development will detract from central city development.

This undermines all the rhetoric and attempts CCC has made to encourage more people to live within the 4 Avenues (including the often-repeated goal of at least 20,000 inner city residents).

Section 4: Medium density

residential zone

169 comments

Section summary

- > The vast majority of comments opposed increased Medium Density Residential Zone development.
- > The anticipated negative impacts were consistent with those identified in comments in section 1 about developing areas with buildings over 12m high.
- > Direct impacts from tall buildings on neighbours were the most discussed issues from respondents who opposed increased medium density residential development, particularly the impacts of shading. Respondents anticipated that loss of sunlight on homes and back yards would create cold, damp living conditions. Loss of privacy was another associated risk.
- > Seismic risks and the likely negative impacts from a future event were reasons why people were fearful of more and higher development on susceptible land.
- > Several respondents focused on the loss of liveability that they envisioned occurring as a result of changes to the MDRZ. The point was also made that the new approach would change who residential housing is appropriate for, in particular, that smaller homes would be less suitable for families.

The comments which are synthesised into theme and topic discussions below came from all the survey questions and comments provided in respondents' own formats. Note that no direct question was asked on this topic.

Oppose MDRZ increased development comments

169

IMPACTS FROM TALL BUILDINGS: SUN BLOCKED, COLD HOMES, GENERAL HEALTH, WIND TUNNELS

16 COMMENTS

Consistent with the comments made on the proposed areas to develop above 12m, direct impacts from tall buildings on neighbours was the most discussed issue from respondents who opposed increased medium density residential development, particularly the impacts of shading. While there was not a question focused on MDRZ, there were still significantly fewer comments made.

A moderate number of respondents were fearful of the potential loss of sun to their home and the negative impact of that happening. This comment discussed the issue generally, what is being lost and an alternative approach.

The Council should revise setbacks and recession planes and let's work with the recession planes in the current District Plan so that the sun can get into houses and gardens and warm them up so people and plants can live, healthily. I thought the Government were encouraging and funding New Zealanders to live in warm, dry homes, and yet our sun is being taken away from us...?

This comment explained in detail a personal circumstance that the respondent would be faced with.

There are areas in Riccarton near Riccarton Rd which have single storey units such as those at 32 Hanrahan St. I live at this address and if the property in Newnham Tce which is on my east boundary were redeveloped and allowed to build higher than it already is plus come within 1 metre of my unit I would get no morning sun in any of my east facing rooms which include 2 bedrooms and my kitchen. I would not be able to remain living in my unit if such a development were to take place. The Council need to ensure with its proposed changes that it doesn't allow large buildings to block out light and sun from existing single storey properties. It simply isn't fair to force property owners, including retired seniors such as myself, into relocating their lives. Having to do so would have a huge impact on my life.

SEISMIC RISK ON MDRZ

10 COMMENTS

Several respondents identified the risks associated with building on TC3 land or generally the risks of earthquakes on residential development. The point was made that we should learn from what occurred in Christchurch's recent past from earthquakes. The damage not only to land that was built on but also underground infrastructure was identified as a potential issue.

These were a couple of the comments.

Christchurch has plenty of available land for new development without the draconian and extreme measures proposed. Allowing intensification via height increases on poorer land such as TC3 is not good planning.

Another big concern is that of safety for the population. According to the engineers I have spoken to, much of the ground in Christchurch is the consistency of toothpaste. It cannot support the massive structures that could be built under the new plan. Another big earthquake could cause even more loss of life and injury if this plan goes ahead.

REDUCED LIVEABILITY

8 COMMENTS

Several respondents focused on the loss of liveability that the envisioned occurring as a result of changes to the MDRZ. The point was also made that the new approach would change who residential housing is appropriate for, in particular that smaller homes would be less appropriate for families to live in. This was a brief comment describing what was anticipated to occur as a result of increased intensification.

These new rules are over-the-top and will destroy the liveability of the city. Residents currently living in the suburbs beyond the four Aves will be forced to move further out.

This was one detailed comment, which painted a negative image of anticipated outcomes.

There is a need to consider who will be living in these new intensified properties before the CCC accepts what central government has passed as being acceptable. Living in Spreydon I have watched the over-intensification of the area. Most of this is two bedroom flats, where one house is removed to be replaced by 4 or 5 flats on two levels. Downstairs a kitchen/living/dining/laundry but too small for both a table and chairs and a lounge suite. The bedrooms are double with about 50cm either side of a double bed. And now, no requirement for off-street parking and taller buildings.

As they are two bedroom flats children will be living in these. With no longer the requirement for off-street parking and an extra floor permitted it is likely that even more flats may be able to be crammed onto sites. As most are bought off-plan it would seem that they are mainly rented out. So what will it be like living in one of these with children? If renting, the most expensive possession will likely be a vehicle that must be parked on the street, and probably some distance from the flat. If the local resident facebook pages are anything to go by, it will get broken into and no Mazda Demios please. Vehicle insurance will be difficult to retain and likely soon the family will no longer own a vehicle.

PRIVACY LOSS

7 COMMENTS

Loss of privacy was another anticipated negative impact of taller buildings being built in the MDRZ area. A small number of respondents made points which included loss of privacy as one of the factors which was anticipated to reduce quality of life for those who had three-storey buildings built next to their home. This comment described the issue and also went further and proposed a solution.

The current recession plane rules have provided residential sections with privacy and light. To suddenly have a three storey structure appear over your fence with its corresponding loss of privacy is grossly unfair. These developments should be in blocks of like buildings with roads and parks and open space buffering the traditional style of housing.

COUNCIL RESPONSE TO GOVERNMENT APPROACH

6 COMMENTS

A small number of respondents reported that they felt the Government changes were not appropriate for Christchurch and that issues from elsewhere are being inappropriately applied to Christchurch. Respondents urged the Council to push back on what they considered will result in negative outcomes for the city. The sentiment in these comments was that Council has some discretion in how it applies the directive, and they should exercise that discretion appropriately. This comment described their preferred approach.

I believe the MDRS is seriously flawed when applied in the Christchurch context. While there is a strong directive in the Act to apply the standard, The Council should be looking for any wriggle room where it can at least try to mitigate its impact on neighbourhoods.

OPPOSE CHANGES TO RECESSION PLANES

6 COMMENTS

A small number of respondents focused on the details of recession planes with the sentiment being that the changes will result in undesirable impacts on neighbours. Some preferred the retention of recession planes described in the District Plan. This is an example of a detailed explanation of an anticipated outcome from the new rules.

The first one is that, in high residential zones, the recession plane requirement will be done away with for the front unit of a development (up to 20 metres from the front boundary), so that there will be more private outdoor space within the development. But this means that a wall of 12 metres or more can be built only one metre away from an internal boundary at the front of the site. My point is, that that is not a directive from central government, but simply a staff decision to protect the privacy of the new residents. How can staff make these decisions if they are not driven by central government, and which pay absolutely no attention to the privacy or shading of established neighbours? I object to such leniency for developers.

DEVELOP VACANT LAND

6 COMMENTS

A small number of respondents stated that vacant land should be developed prior to infill intensification in Christchurch suburbs. This comment was specific to what could occur in one area of Christchurch.

The Papanui Heritage Group objects to the medium density residential standards (MDRS) which will allow 12m high, three unit dwellings to be built on all residential sections in the Papanui area. We don't agree that such intensification is necessary in suburban Christchurch. Instead, our contention is that the gradual building of infill housing, or blocks of single or double storey flats on empty sections, as is happening now, will meet Papanui's future housing needs.

RETENTION OF 'GARDEN CITY' OR TREES GENERALLY

5 COMMENTS

Another desire of respondents was to retain trees, with some respondents referring to this as enabling Christchurch to retain its reputation as the 'garden city'. For some it was not just retaining a number of trees but the overall city-wide impression that established trees and gardens create. This comment describes one Christchurch resident's pride in being known as the garden city.

I understand that this plan involves cutting down some of the tree canopy over the city and that many of the trees will be old, established and native trees. Christchurch prides itself on being The Garden City and it would be devastating for those of us who love the green city to see it be changed into a concrete jungle.

This was one of the comments identifying Christchurch's status as the 'garden city' as a point of difference.

To retain the Garden City we would need to have trees that are proportionally sized to the buildings so that the trees continue to dominate the visual aspects in neighbourhoods. Our position in New Zealand is the Garden City - this is an important differentiator for economic, social and environment reasons, and something residents are passionate about retaining for the future; and in our personal experience being a new resident its why we chose to move here, so its just as important for new residents. Otherwise where's your point of difference to Auckland...being flatter?

COMMUNITY FUNCTIONING, WELLBEING, COMMUNITY IMPACTS INCLUDING MENTAL HEALTH 5 COMMENTS

A small number of respondents focused on how changes to MDRZ rules will impact how communities function and overall wellbeing. One respondent went on to make the point that as long as people's quality of life is assured in areas outside of Christchurch, such as Rolleston, then urban sprawl will not be reduced. The point was made that people could avoid the risk of having a large building built next to them by moving to an area where this isn't possible. This comment articulated the issue.

Social wellbeing in Christchurch communities, especially areas such as Cashmere flats, Beckenham would be greatly negatively affected if multi storey houses start being built. People choose housing in these areas for family feel, views, privacy and safety of their children playing in backyards. If people can start building without neighbouring properties being able to contest building plans, this is not democracy. It also affects their properties own vale. This is significant social wellbeing issues. Build more properties outside areas of Chch rather than building densely in areas that have appealed to those for the benefits they currently enjoy.

SINGLE STORIES DWARFED, LOSS OF AMBIENCE 4 COMMENTS

A small number of comments were provided by respondents who objected to high buildings appearing as neighbours because of the overall loss of amenity, some also alluded to loss of value of their property. These comments were similar to the comments regarding loss of sunlight and privacy. The following is an example of one of the comments made.

How you can allow any development over 2 meters is beyond me, consider those on the other side of the fence, would you like a 3m or 20m building on your boundary?

OFF-STREET PARKING AND GARAGE SPACE ISSUES 4 COMMENTS

A small number of respondents requested the impact on residents of not requiring car parks to provided on site to be considered. This was one of the comments which described the issue.

An issue that is often raised within our communities but is not addressed within this plan change is the recent removal of car parking requirements for developments. The consequence of this is that, once more developments are built with no off-street parking, more residents will park their cars on the street. This is not a big issue on streets that are suitable for this (busy streets with lots of parking availability) but has a substantial negative impact in quiet suburban areas, especially those with very narrow streets that only allow for parking on one side of the road. This needs to be considered when allowing developments to occur.

IMPACT ON ESTABLISHED TREE AREAS (RICCARTON BUSH, PAPANUI MEMORIAL) 4 COMMENTS

A small number of respondents discussed the impacts of MDRZ development on established natural areas. This comment made the point that the amenity of the Beckenham Loop area would be compromised if there was a change in the demographic of people living in the area.

Having the Beckenham loop so close to the city where it offers an almost park-like setting that is set amongst character family homes is what sets us apart from other close suburbs to the city and it is what attracts people from all over Christchurch to visit this area for cycling and walking. If this was to change and become a high-density area, allowing 3 story apartment-style buildings to be built, instantly the feel of our family neighborhood would change drastically, and no longer would we be attracting families, but young adults that quite rightly, are not at that stage of life where they care or have the time to be interested in looking after their homes, gardens and community grounds.

HOUSING AND NEIGHBOURHOOD AESTHETICS, OVERALL AMENITY **4** COMMENTS

A small number of respondents focused on the aesthetics of housing and the overall amenity of their area and how that will change under new MDRZ conditions. This comment described the changes in a particular area.

The city has nice out suburbs where people don't want tall dense buildings. Build those closer to town where they will be expected. Bishopdale being on the proposal is going to ruin the peaceful nature of the suburb. We don't need medium or high-density housing everywhere, like don't spread it out! Make the city the central focus like they do elsewhere and leave the suburbs for those who want some peace, quiet and space!

12M IS APPROPRIATE, SUPPORT CHANGES

4 COMMENTS

A small number of respondents agreed that 12m developments in MDRZ areas is appropriate. One response from an engineering firm considered the historic, social, and architectural context of the current planning rules and arrived at the conclusion that building to 12m in MDRZ areas was appropriate, the full text provides great detail of the argument. This is quoted from this response.

1. The 400 square metre rule makes sense if it's assumed that the sections will be occupied by up to three houses. Is the three dwelling per site rule absolute? If a small house is built lot-line to lot-line with no front setback or off-street parking, a 125 square metre house can be built on a 125 square metre section with a 60 square metre garden, so a minimum useful section could be smaller. I understand that most new multi-unit developments are done as body corporates, though I also understand that such dwellings cannot be purchased under most bank's residential lending rules, instead coming under commercial lending rules with higher interest and much larger deposits. This makes such dwellings less accessible to first home buyers. That said, I also understand that free-standing houses on a cross-lease can be purchased at residential rates. In the absence of Government changes on residential lending rules, it might be helpful that planners and developers are aware of this, maybe even with the CCC offering advice on better cross-lease agreements.

2. The proposed higher height limits and steeper recession planes will be very helpful. Recession planes/sunlight access planes have a much greater impact than height limits. In my experience while height limits are important, sunlight access planes have a greater effect on built form and land use, and for most individual properties make height limits irrelevant. With recession planes calculated starting at 2.3 metres off the ground, a section oriented north-south in the Residential Suburban Zone would need to be more than 14 metres wide before a house could be permitted to reach the 8-metre height limit, and more than 15 metres wide if the section were oriented east-west. This effectively forbids two storey houses on small sections over much of the city.

A few respondents made general comments supporting development to 12m believing that it was appropriate.

CLARIFICATION SOUGHT

3 COMMENTS

A few specific clarifications were sought. These points were made by one respondent.

Given the lack of information, evidence, and subdivision chapter rules released as part of this draft plan change, it is considered that people cannot make robust submissions on this draft plan change. It is therefore our recommendation that the subdivision rules should not have immediate legal effect in August 2022 because people have not had the change to review any proposed subdivision rules and to provide submissions on them.

Medium density buildings: The proposed change says without resource consent, buildings must not "Cover up to 50 per cent of the site" It is unclear whether this refers to individual buildings (i.e. can 2 buildings cover 40% of the land each, provided all other criteria are met?) I would appreciate if you can contact me with this clarification.

INCLUDE A PARTICULAR AREA

3 COMMENTS

A few respondents sought the inclusion of particular areas in the MDRZ area: one was Redmund Spur, another a particular section in Westall Lane, Avonhead and another questioned why Governors Bay isn't included.

MORE LENIENT STANDARDS

2 COMMENTS

A couple of respondents sought greater ability to develop in MDRZ areas, one was a specific parcel and another a property where de-listing from being a Significant Individual Tree was requested because of dangerous branches.

VARIETY OF TOPICS

42 COMMENTS

A number of points were raised three or fewer times specifically focused on MDRZ areas. These points are briefly described in this discussion. The brackets contain the number of respondents who made each point:

- > **Three waters infrastructure (3):** difficult planning infrastructure upgrades not knowing in advance where growth will occur along with additional hard surfaces adding to storm water impacts.
- > **Consenting requirements (3):** these respondents requested the retention of consenting requirements for significant developments in MDRZ areas.
- > **Incompatible height in neighbourhoods (3):** these comments generally opposed high-rise buildings in traditional low-rise neighborhoods.
- > **Congestion and poor traffic flow (2):** a couple of points were made, one was that increased intensity in outer suburbs will contribute to greater congestion and another was that narrow streets will be difficult to travel down with increased vehicles having to navigate greater numbers of parked cars.
- > **Devalue homes (2):** these comments made the point that the arrival of tall buildings in established areas would devalue existing homes.
- > **Impact on solar panels (2):** a significant loss identified by these respondents was shading of solar panels reducing their effectiveness.
- > **Developer impacts on areas (2):** one respondent focused on the impacts caused during developments in existing subdivisions and how these could be mitigated, and another stated that developers have too much freedom to develop poor-quality housing.
- > **Schedule of significant trees (2):** these respondents wanted greater funding and focus on the protection of significant trees.
- > **Climate change (2):** taking the opportunity to plan for climate change was encouraged.
- > **Future community engagement (2):** both respondents stated that communities should have a say on what is developed in their area.
- > **Data and projections underpinning the process (2):** one respondent argued that a robust social cost benefit analysis be completed prior to zoning maps being released, another questioned how much development capacity needs to be provided for.
- > **Greater impacts of recession planes in Christchurch (2):** these respondents made the point that because the sun is lower in Christchurch than in Auckland during winter the impacts of recession planes are more significant.
- > **Housing and neighbourhood functionality (2):** these respondents felt that lower-standard developments and living environments would reduce the attraction of Christchurch or force people to live in outer regions.

These points were made by individual respondents in this section: significant impacts during the development of areas would need to be managed; desire to stop development on fertile farm land immediately; fear that changes to housing provision would change the nature of suburbs and increase crime and anti-social behaviour; criticism of the lack of on-street parking; question asked where electric cars will be charged; peace and quiet will be reduced by the developments; shading from neighbours feared to impact growth in gardens; flooding will increase if drainage systems are not fit for the purpose of managing intensification; encouragement to retain land for parks, especially in the East; fear that monolithic architecture and low-quality developments will proliferate; residential development and traffic planners need to work more closely together; Council needs to listen to residents more; medium density zones are not clearly enough marked on maps; some small sections should be exempt from intensification; Council should reject what the Government is planning because it isn't appropriate for Christchurch.

OTHER MDRZ COMMENTS

30 COMMENTS

A considerable number of other comments were made regarding MDRZ issues.

A specific piece of land between Mairehau Rd, Greenhaven Drive, QE2 Drive, and Marshlands Rd was identified for potential development.

A detailed comment from an architectural firm critiqued a number of rules in the plan and provided opinions on changes.

Generation Zero identified medium density housing without a resource consent as an important change in increasing the supply of housing and sought a focus on mass rapid transit. They were also in favour of perimeter block fencing.

One respondent felt that allowing suburban development will stymie city growth.

One suggestion was for every pedestrian traffic light to have a canopy tree providing shading, deciduous trees were also proposed by this respondent. The point was that large trees provide good shade.

Waitai Coastal-Burwood Community Board emphasised that subdivisions play an important role in addressing the housing shortage and also warned against not providing enough housing variety.

The **Summit Road Society** supported the plan not to change existing residential areas on the Port Hills, along with a number of other specific points raised in their detailed comment.

Waihoru Spreydon-Cashmere Community Board prefer a limit of two stories on suburban streets with three story or even higher on busy roads and around suburban hubs. They also argued that housing should only change a suburb to improve it.

There was a desire from one submitter for the Council to be more extensive in where it plants street trees, such as roundabout and small areas of Council managed land.

An engineering firm sought greater clarity on Greenfield Precincts, and felt detail was lacking.

Englefield Residents Association wanted to see houses being built that people actually want to live in, and linked outdoor space and a sense of community to mental health.

A retirement village sought medium density standards for their villages.

A contracting firm stated that they do not support the imposition of a 'maximum' allotment size as indicated and submitted that residential yield requirements are maintained in accordance with the current 15 hhu/ha standard.

The Retirement Villages Association provided a long and detailed submission discussing issues concerning the development of retirements villages.

Section summary

- > Around four times as many comments were made suggesting qualifying matters should be increased than comments which either agreed with what is proposed or suggested reducing qualifying matters.
- > Two thirds of the comments which called for an **increase in qualifying matters** discussed character or heritage items. Just under half of these comments discussed the preservation of character and heritage generally, with the majority of comments focused on specific areas.
 - o Character and heritage was discussed in these ways:
 - Those who discussed the preservation of city-wide heritage and character didn't want development to destroy important sites or areas. One of the key arguments that supported this was that Christchurch lost a lot of heritage during the earthquake and the city should retain as much as possible.
 - Riccarton Bush was the most commented on heritage or character area with the community wanting it protected from the imposition of tall buildings being built close to its boundary. Respondents were concerned that construction and ongoing impacts would negatively affect the remnant podocarp trees and also impact an important historic site in the founding of Canterbury.
 - Richmond was another area that was commonly discussed, with people wanting the area that is currently protected extended to the south.
 - The 15 Papanui Memorial Streets were also considered important places to protect for the environmental and heritage values that the area holds for the local community and veterans.
 - Beckenham Loop was the existing character area discussed most, with respondents focused on extending the area that has been identified in the Plan. Respondents wanted a more continuous area protected from three-storey development.
 - Other existing heritage and character areas that received comment in support of protection were: Dudley, Chester Street East, Englefield and St Albans.
 - o Impacts on natural features was another issue that respondents wanted addressed with qualifying matters. Riccarton Bush and the Papanui Memorial Streets were again identified as areas to protect because of their natural heritage values.
 - o Loss of sun from tall neighbouring buildings was another negative impact of development that people sought protection from.
 - o Concern was expressed about the ability of Christchurch's three waters infrastructure to cope with greater development especially the old, damaged pipes that remain from the earthquakes. Related were fears about seismic events damaging land, and requests for land quality to be a qualifying matter.
- > Those who **sought a reduction** in qualifying matters primarily focused on particular heritage and character sites and infrastructure.
 - o Several respondents generally felt that the need to protect character was overblown, while others questioned the value of protecting particular locations, with Piko in Riccarton discussed most.
- > Those who **agreed with qualifying matters** as they are outlined in the draft Plan focused most on heritage-character infrastructure and coastal hazards.
 - o Heritage-character comments most commonly made general supportive statements (city-wide), with Beckham being the most supported specific location.
 - o Infrastructure comments focused on supporting the vacuum sewer rules, and came from respondents living in the affected areas.
 - o Several respondents, mainly government organisations, supported the coastal hazards qualifying matters.

The comments synthesised below primarily came from respondents answering the question: *Do you have any comments about the proposed Qualifying Matters that will restrict intensified development or thresholds for needing a resource consent?* When responses from other questions were relevant to this topic they were also included within this analysis. Responses include both survey responses and comments provided in respondents' own formats. Also note, that heritage and character comments received via the Heritage Plan Change PC13 have also been included in the character and heritage sections that follow.

Agree with qualifying matters **71 comments**

AGREE WITH PROPOSED HERITAGE AND CHARACTER AREAS **11 COMMENTS**

City wide comments **11 comments**

Several respondents commented in support of the approach to city-wide heritage and character qualifying matters. These were generally short statements of support with some going further to state this is a good overall approach or critiquing the approach as positive overall for the city. Waikura Linwood Central Heathcote Community Board expressed that character and heritage protection should evolve.

The Board suggests that provision should be made for interim protection of areas and sites with potential heritage values to allow time for necessary in depth investigation to be undertaken before their values are undermined or lost by inappropriate development.
The Board has adopted the Greening the East Development Plan to increase the tree canopy to use as a model for future development over the rest of the city.

A few respondents stated that this approach is necessary to fulfill the requirements of PC13. This comment was provided by DOC.

DOC supports the inclusion of residential heritage areas as a 'qualifying matter' as this is necessary to give effect to PC13.

AGREEMENT WITH CHARACTER AREA **7 COMMENTS**

Beckenham **3 comments**

A few respondents expressed their support for Beckenham as a character area. This was one of the comments.

I support that the Beckenham Character Area be a Qualifying Matter where lower density rules should apply. This is to protect the street scene and special character of the Beckenham Loop.

While the Beckenham Neighbourhood Association Inc (BNA) was generally supportive, their comment included this statement.

While we are broadly very supportive of the approach in PC14, we think some fine tuning of the development rules for the Character Area could be considered. For example, the proposed building setback from the street (8 m), minimum building width facing the street (10 m), and minimum building floor area (150 m²) are all larger than many of the original character bungalows whose general street scene these rules seek to protect.

Note that there are a significant number of comments later in this report from respondents who suggest Beckenham loop should be protected to a greater extent than what is outlined—primarily increasing the area.

Recommended heritage locations **4 comments**

Four other areas were also supported by individual respondents. There was support for the protection of Deans Cottage in Riccarton Bush. There was general support offered for heritage protection in Riccarton and Shirley and this comment was made by **Waikura Linwood Central Heathcote Community Board**.

The Board is referring to Chester Street East which has one end in a residential character area, the other end (at Fitzgerald Avenue) is high density, and then on the opposite side of Fitzgerald Avenue there is Englefield Heritage

Area. The Board wishes that whole streets are taken in Residential Heritage Areas to give the community a sense of continuation.

Note there are significant more comments in favour of increasing protection or area and sites in the next section.

AGREE WITH INFRASTRUCTURE QUALIFYING MATTERS

16 COMMENTS

Note infrastructure comments were primarily focused on the vacuum sewer wastewater systems installed post-earthquakes to cope better in Shirley, Aranui and Prestons. The propose of the qualifying matter is to make these areas exempt from the new provisions, with reduced densities of housing, because the systems are at capacity.

A moderate number of respondents supported the infrastructure qualifying matters. The majority of these comments were from people living within the affected areas of Shirley, Aranui and Prestons. Most provided moderately lengthened explanations supporting their opinion, such as this one.

I agree with the proposal that properties in the Shirley, Aranui and Prestons vacuum sewer areas should be excluded from intensification as proposed by the new rules. The fact that vacuum sewer area capacity has now been reached is pertinent to the decision. However, while agreeing that the "like for like" development is appropriate for Shirley and Aranui, I am fully in favour of high-rise apartment developments in other areas, as long as they are sustainably built, allowing for all health needs, physically and socially.

This was another first-hand representative statement.

To whom it may concern, Just wanting to agree that Shirley is totally unsuitable for intensified housing. Due to the problems we already experience with the vacuum sewerage system.

This respondent agreed with the approach and also felt that there were better uses of Council funds than upgrading the sewer system.

We believe the current character of the Prestons subdivision would be eroded if further intensification was to ahead. Also, we believe there are other priorities in the area for the use of the funding to upgrade the Prestons vacuum sewer pump station, such as the establishment of a community/service centre for the Prestons community.

ECAN Canterbury Regional Council supported the provisions, this was part of their comment.

CRC supports limiting intensification where the infrastructure capacity would not be sufficient to support further development. Limiting intensification in areas where infrastructure is design constrained would be consistent with the objectives and policies of the CRPS.

Some respondent went beyond the stated provisions.

The CDHB was in support of the current infrastructure provisions, but also commented on going further by also protecting green space infrastructure and extending to considering more areas for protection due to the existing capacity of three waters infrastructure. This was their comment.

Basic Infrastructure Capacity and Green Spaces The CDHB notes that the CCC is aware of existing infrastructure constraints, particularly the wastewater system constraints in Shirley, Aranui, and Prestons. However, the CDHB recommends that some consideration is also given to the impact that medium and high-density development could have on the groundwater levels and subsequent impact on green spaces, for example Deans Bush or Styx Mill Reserve. The CDHB notes that there are precious green spaces and areas of significant biodiversity in Ōtautahi Christchurch that neighbourhoods.

One respondent also supported the provisions because they will reduce greenhouse gas emissions.

CRC supports limiting intensification where the infrastructure capacity would not be sufficient to support further development. Limiting intensification in areas where infrastructure is design constrained would be consistent with the objectives and policies of the CRPS.

One respondent also supported the pylon set back provisions.

Pylons and noise should be avoided because of the adverse effects on residents of new buildings.

AGREE WITH COASTAL HAZARDS

9 COMMENTS

Note that all of these comments haven't been added to the Draft Coastal Hazards Plan Change PC12 report.

The several respondents who commented on this matter in this process were primarily organisations, such as DOC, EQC, ECAN and Community Boards, Waikura Linwood Central Heathcote Community Board and Heritage New Zealand. This supportive comment was from a member of the public.

No, it is good that the council are moving away from these areas. If there is a risk that these areas will become flooded etc, then let's not develop them at all, but there NEEDS to be a plan for those living there to be paid out when they move (no sales) and to keep the area nice while people still live there, then abolish the area as people move on.

AGREE WITH TREE PROTECTION

5 COMMENTS

Note a separate section in this report, Financial Contributions, primarily covers tree protection as well as many other comments discussing the impact of the potential loss of trees in the building higher than the 12m section, and the Medium Density Residential Zone section.

In support of this provision the CDHB and Christchurch Civic Trust provided quite long comments in support of the protection of trees. This was part of the comment from the Civic Trust.

CCT firmly believes that Option 4 (Option 3, plus additional listed urban trees on private land to the tree schedule in District Plan Chapter 9.4) is the option that CCC must take. By this means, the 'low and decreasing urban tree cover ...' can be arrested, to the benefit of citizens (young and old) and communities for which the benefits of nature in an increasingly built / tech environment become ever more important.

This was one short statement from a member of the public.

I agree with protecting areas of character homes, avoiding coastal hazards, and protecting significant trees.

AGREE WITH AIRPORT NOISE CONTOURS

2 COMMENTS

Christchurch Airport and NZ Airports provided long and detailed comments in support of the airport noise contours. Christchurch Airport summed up their discussion by making this point.

Through the documents released as part of Draft PC14 the Council has acknowledged that the Airport Noise Contours and the Airport Protection Surfaces are a qualifying matter (in recognition of CIAL as nationally significant infrastructure). CIAL supports this recognition and application of noise contours as a qualifying matter for the reasons outlined above.

OTHER ONE-OFF COMMENTS

21 COMMENTS

A moderate number of one-off comments were made in support of the proposed qualifying matters, traversing a variety of topics. The majority of these comments were short statements responding to the question posed in a positive manner, providing comments like this one.

The proposed Qualifying Matters make sense

One respondent who agreed with qualifying matters felt that schedules of significant trees should include collections of trees.

This overall supportive comment was made by Waitai Coastal-Burwood Community Board

The Board's view is that assessment about the suitability for increasing housing (qualifying matters) strikes a good balance between needing to build more housing, while also protecting existing infrastructure, heritage and public open spaces.

EQC made this supportive comment

EQC strongly supports the inclusion of qualifying matter controls for the high flood hazard management area, slope instability and tsunami hazards in the two plan changes.

A couple of comments were a little uncertain on how qualifying matters would be applied, and made points similar to this one.

My only concern is how they are applied when it comes to applying for Resource Consent. I would be concerned if they became used by council as a backdoor way to block good quality development.

Increase Qualifying Matters

644 comments

CHARACTER AND HERITAGE AREAS

186 COMMENTS

City wide comments

97 comments

A sizeable number of respondents supported increased city-wide character and/or heritage protection. The majority of these statements were from community members who wanted character and heritage protection across the city to be increased. This was one of the comments seeking increased protection.

We are strongly opposed to the change, effectively you are foisting upon us character destroying developments onto our area which has many special character and heritage features. We do not want large sun blocking, architectural monstrosities, which will turn out to be nothing but poorly maintained slums of the future.

It is great to see more heritage included in the heritage plan. Again I am sure that there are even more buildings that could be included. Once they are gone they are gone...

This comment was favourable toward the general approach but again the respondent felt the Council should go further.

The concept of giving heritage protection to entire neighbourhoods or areas has been internationally recognised as very important for very many years, but in the case of Christchurch, the areas or neighbourhoods being protected are too limited, and the protections is not sufficiently robust. Protection of trees needs strengthening too.

Several respondents focused on the amount of heritage lost during the earthquakes and expressed a desire for care to be taken to protect what is left. This was one of the comments.

Christchurch lost too many of her beautiful old character homes due to the earthquakes and now the ones that have survived appear to being lost to intensive development. I am not a fan as you can see.

Having quickly destroyed many character and heritage buildings (Brownlee's 'old dungas') postquake, it is important to retain those that remain. The character and heritage areas identified in the Council's proposal are an absolute minimum.

The sentiment in this comment was for the Council to hold firm on what is protected, which was expressed by a small number of respondents.

I wish to provide my support for the maintenance of the residential heritage areas as proposed. Additionally I would encourage the council to be careful with issue of resource consents in these areas. Particularly with high land values there is a strong motivation for individuals or developers to "sell out" on a community to make a one off profit. Once this occurs there is an irreversible dilution of the historical and cultural value of these areas, which provides benefit for the whole city.

Heritage New Zealand provided a long and detailed response listing overall support and also focusing on individual heritage elements. They provided feedback on proposed wording of definitions, policies and rules within the Historic Heritage chapter of the District Plan. The support they offered was captured in this comment.

HNZPT supports the scheduling of 40 additional heritage items and 25 additional interiors for protection under the District Plan. We understand that this forms part of an ongoing programme to identify new heritage places and to assess additional building interiors. We also support the simplified method of protecting interiors, providing clarity on which interiors are protected and which are not. Further to point 5. of this feedback, we reiterate our support for the proposed inclusion of Residential Heritage Areas, which are made up of multiple buildings and features that are collectively, rather than individually, of significance to the City's heritage and character. HNZPT considers this will provide an important new layer of protection for these neighbourhoods with heritage values.

Historic Places Canterbury made this comment.

Historic Places Canterbury welcomes the simplification and clarification of rules for protecting heritage and the correction of errors. We also welcome and support the extension of protection of interiors to additional buildings. We also welcome the proposal to add new items to the Schedule of Significant Historic Heritage. We particularly welcome the effort to expand the types of heritage which are recognised under the plan and support the ongoing application of a thematic approach. While fully supportive of all the proposed additions, Historic Places Canterbury believes that there are a number of potentially worthy additions to the list which have not been proposed at this stage and which we believe are worthy of further investigation. These have been uploaded as a separate document.

Individual Character areas

41 comments

Beckenham Loop - Fisher Ave, Waimea and Eastern Tce, Large Area (Beckenham) 26 comments

Comments about the Beckenham Loop overwhelmingly called for protection to be retained for the Loop as a whole, rather than allowing some areas or streets within it to be eligible for increased development. This was generally on the grounds that allowing three-storey development in certain pockets would diminish the amenity and character/heritage value of the rest of the area, notably its tranquility, sense of community, safety, parking, aesthetics, recreational amenity, trees, and birdlife. People expressed fears that new three-storey developments among modest homes and bungalows would result in a loss of sunlight and privacy and decrease their property values. One respondent was particularly unhappy about development led by developers, arguing that this will be a profit-driven approach that will lead to poor outcomes for residents. Concerns about stress on infrastructure and increased risk of flooding were also raised. This comment was part of a relatively detailed comment made in support of retaining the size of the area.

Beckenham Loop Character Area should be considered as a whole, especially following the river. Unlike many other character areas, Beckenham Loop is an area that is clearly defined by the loop of the Heathcote/Opawaho. Cutting bits off at the bottom of the loop makes no sense and destroys the integrity of the area. Those walking/cycling along the river (a recreational activity done by many and not just by people from the Loop) would be going from a character part into a randomly designed high-density part into a character part. If those parts of the Loop that currently have the least character houses, will be retained in the character area, the area will eventually become more and more in character. In fact, this is already happening. We know of at least two houses in the southeast part that is proposed to be excluded that were severely damaged in the earthquakes which were not in character before the earthquakes but have been rebuilt in the character of the Loop. Retaining the character area for the whole of the Beckenham Loop ensures that in time more and more houses are in the Beckenham Loop style for all to enjoy including all recreational walkers and cyclists from outside the Loop.

Specific objections were made to the proposed changes for Castle Way. Respondents contended that while the buildings were newer, the low style of development was sympathetic to the rest of the area and maintained its leafy aspect, and should be protected. Objections were also raised to removing protection from back properties around Norwood Street, Fisher Ave and Waimea Terrace, on the grounds that development would negatively impact front character properties, increase traffic and pose a safety risk on Waimea Terrace, and degrade the Ōpāwaho (Heathcote) river ecosystem by heightening pollution and run-off.

Respondents requested that the Loop's mature trees, vegetation, gardens, and abundant birdlife be considered and protected as a key part of the area's value. The **Beckenham Neighbourhood Association Inc (BNA)** made this comment

While we are broadly very supportive of the approach in PC14, we think some fine tuning of the development rules for the Character Area could be considered. For example, the proposed building setback from the street (8 m), minimum building width facing the street (10 m), and minimum building floor area (150 m²) are all larger than many of the original character bungalows whose general street scene these rules seek to protect. We think these could be looked at in detail before the Plan Change is finalised, to ensure the rules are effective at protecting street scene without being so restrictive that second dwellings would not practically fit behind an existing house.

Hills, North Avon, Petrie, Shirley Rd (Dudley)

8 comments

All comments regarding Dudley called for it to be retained as a character area and for development to be limited. A couple of the more detailed comments emphasised the area's longstanding appeal, heritage value, and the residents' commitment to rebuilding earthquake-damaged homes in character style. One respondent also noted that the area experienced heavy liquefaction during the earthquakes and contended it was therefore unsuitable for intensification. A few comments requested both North and South Richmond be included as heritage areas, or that the character area be widened east up to the red zone.

One respondent objected to parts of the Boffa Miskell assessment report, arguing that the percentage of Primary and Contributory dwellings are higher than the reported numbers. They suggested that both vacant sites and rear buildings should be excluded from the assessment, and questioned why new buildings which have been designed in keeping with character guidelines were determined to be neutral. They suggested greater community engagement to ensure community context would be accounted for in future reviews.

Innes, Mersey and Severn to Westminster Street (Malvern and Severn)

2 comments

Support was strongly expressed by one respondent for the protection of the area around Malvern Street, and for the broader protection of heritage areas as outlined by the Council. However, they expressed their objection to medium-density intensification across the city more broadly, fearing that this would lead to a reduction in greenery and contribute to an increase in mental health problems.

One response contended that as townhouses were already being built on Rutland Street there was no need to include it in the protected zone, and suggested site coverage be increased to 50% rather than the proposed 35%.

Finally, one respondent stated that the consultation should have been carried out before the new motorway opened, which they felt had already ruined the character of St Albans.

Tainui, Darley, Moana (Tainui)

2 comments

Concerns were raised about the impacts of subdivisions in the Tainui Character Area, with calls for more consideration around how these impacts would be managed. Issues raised included increases in vehicle traffic and pressures on parking, potential weakening of the social fabric of the community, and how aesthetics could be managed to minimise negative visual impacts on the character of the area.

Cashmere

3 comments

A few relatively long comments argued that the Cashmere area needs consideration for better protection to ensure it remains a special part of Christchurch, suggesting that areas that were recognised as special character previously should be retained. This submission listed many homes in the area that have belonged to notable residents and are still well maintained today, arguing that this part of the neighbourhood's history should be protected.

One submission also noted that Cashmere has become a haven for increasing numbers of native birds such as kereru, fantails, bellbirds, moreporks and others. Therefore, the submission argued that there are significant ecological factors to consider. With Cashmere's links to Victoria Park and the large amount of wildlife in the area, increased traffic on the hill and infill housing may have a negative impact on the flora and fauna in the area, as well as exacerbating existing access, traffic safety, and infrastructure and school capacity issues. This submission concluded by noting that it has taken over 100 years to establish a unique and distinct suburb that has its own identity, and asks the Council to protect Cashmere as a whole for future generations. This was one of the comments.

The Cashmere Area needs consideration for better protection to ensure it remains a special part of Christchurch. Areas that were recognised as special character previously should be retained. Cashmere has an interesting and

significant history and should be protected from any structures that will significantly change the visual character and ecological significance (tree coverage is impressive and noted and needs to be protected)

Heritage Areas

48 comments

Chester Street East and Dawson Street

13 comments

All comments regarding Chester Street East/Dawson Street were strongly supportive of the area's designation as a Residential Heritage Area, emphasising the deep value placed by the community on its appealing street frontage and mature trees and the committed efforts of residents to preserve these historic houses. The majority of this feedback considered the current boundaries too limited and called for the designation to be extended to the entirety of the street, arguing that this was necessary to protect its character, visual cohesion, trees and birdlife, and the sense of community. One respondent felt specific trees should be protected.

One respondent suggested extending the boundaries to include heritage character cottages along Barbadoes Street (341, 343 and 347, and 348 – 342 on the other side of the road), the character cottages along Dawson Street (145, 147, and 173), and 217-223 Fitzgerald Ave. Another noted that the boundaries needed to be updated at the Madras Street end, and specified that 79 Chester Street sits within the Oxford Terrace Baptist Church site which is currently being redeveloped.

A few respondents discussed the importance of ensuring that any development on currently empty sections is sympathetic to the rest of the street (with one suggesting historic construction materials and paint colours for buildings visible from the street, and heights in keeping with existing properties), that empty sections are required to be kept tidy, and that areas such as the Church carpark and Fire Station southern boundary are required to be screened with attractive planting until the land is developed. One respondent requested that the Council implement tools to encourage owners to improve properties labelled intrusive, such as setting required timeframes to move them to "at least neutral", increasing rates for continued intrusive status, and penalties/charging for section clearing and weeding/mowing. However, another respondent argued against the labelling of the carpark at 102 Chester Street as intrusive, citing its mature trees and its contribution to minimising cars parked on the street.

Two respondents discussed rules regarding subdivisions. One expressed their support for the RHA rules as they apply to houses and gardens visible from the street, but contended that restrictions should be minimised to allow development/subdivision in back sections. They argued that development in back sections should be a permitted activity as this would not impinge on the street's frontage and character, would be in keeping with the aims of the NPS-UD to allow intensification where possible, and could offset the other constraints placed upon owners of heritage houses (i.e., the higher costs of maintaining heritage homes and the restrictions on altering their homes as they see fit.) The other respondent called for subdivision rules to be more restrictive than the current District Plan, fearing that "unfettered and unsympathetic subdivision will severely compromise the coherence and collective nature of the buildings", and requesting height limits and design guidelines or rules.

Fitzgerald, Armagh, Gilby, Avonside Dr (Englefield)

11 comments

Several respondents commented on this area. All comments supported Englefield's RHA designation and extolled its high heritage values, with a few respondents emphasising the importance of ensuring that Englefield Lodge is preserved as part of this. One comprehensive response detailed the building's outstanding heritage values as one of the oldest buildings in Christchurch with a colourful history, and exhorted the Council to recognise this and prioritise its restoration.

Another respondent expressed concern about unsympathetic development occurring, citing new buildings on East Armagh and Kilmore Streets as examples of developments which detract from the surrounding area due to their height or aesthetic style, as well as the increased pressure on parking. They called for development to be "sympathetic, architecturally appropriate and encouraging of community values", offering the Brougham Street community housing project as a positive example, and emphasised the importance of maintaining trees and greenery where intensification occurs to provide corridors for wildlife.

This response urged a comprehensive approach be taken in this area.

We are happy to see Englefield Area and others being recognised for protection from intensification and other developments not 'in character'. We would like to see the Englefield Heritage Area to especially include Englefield Lodge, the second house to be built in Christchurch. See document attached. (1). The whole of our Heritage Area is the original Britten Farm borders – From corner of Fitzgerald Ave to Avonside Drive, to England Street, to

Armagh Street, to Fitzgerald Avenue, back to Avonside Drive. This area is recognised by NZ Post and as such we request that it should all remain together as a 'Heritage' – Special Character area. We are a tourist attraction and have many visitors on walking tours both from overseas and locals. It is in all our interests to preserve and encourage conservation of these heritage areas for the health and vitality of this city and for future generations.

If only the little bits proposed were protected, then we could be surrounded by a concrete jungle in the future which will detract from the Heritage/Character areas diminishing value.

Innes, Rutland, Westminster, Roosevelt (St Albans)

7 comments

All comments expressed their strong support for the St Albans Residential Heritage Area, with almost every comment mentioning the importance they placed on the preservation of Gosset Street in particular. One respondent noted that the area's longstanding status as a SAM/character area meant that the "proposed RHA will not represent a dramatic change for current owners", and cited a previous study carried out by the Council which had showed widespread support for character values among residents. They praised what they felt were the strengthened rules of the RHA over the previous rules governing character areas.

Lyttelton

5 comments

A few comments were made in support of Lyttelton's inclusion as a Residential Heritage Area, citing its heritage values and its unsuitability for intensification.

The Ministry of Education focused on the Lyttelton School and sought assurance that it would be able to effectively manage it in the future. They summed up, making this point.

It is noted that Lyttelton School is designated, and the existing designation will prevail over the proposed RHA heritage controls provided the relevant project works are in accordance with the designation.

Forbes and Shelley Streets

3 comments

Opinion was split among comments regarding the Shelley/Forbes Street Residential Heritage Area. Two people expressed their support for Shelley Street's inclusion based on the historically significant workers' cottages, while one requested exceptions be made for derelict or earthquake-damaged properties to be developed, noting that there was such a row in Shelley Street.

Two comments objected to Forbes Street being included within the RHA, arguing that many of the buildings have low/no heritage or aesthetic value or are extremely run-down, and that the street's location makes it ideal for sympathetic development close to the CBD. One of these suggested the "better maintained heritage properties" be retained.

Lastly, one person remarked that many of the historic houses in the area would require substantial investment to improve their condition, creating a "tremendous financial burden" for the property owner. They suggested significantly more funding in heritage grants is needed to support this.

MacMillan Avenue (Cashmere)

3 comments

A few respondents commended Council for their efforts to retain key areas within the restrictions set out by central government, but categorised the proposal for Cashmere Hills as "ineffective" and argued that the whole of Macmillan Avenue and the whole of the previous character area should be reinstated. They cited Macmillan Ave's popularity with walkers, the architectural and historical variety represented by houses along the street's length, as well as noting that the narrow and winding street was "barely functional" for existing dwellings and was ill-suited for further development. This was one respondents request.

Macmillan Avenue is a narrow street very popular with walkers, who enjoy the view and overall environment. The houses represent a range of periods of Christchurch history along its whole length including significant Arts and Crafts, Art Deco, Christchurch Modern and later mid century examples designed by local but nationally significant architects.

One respondent who did want to protect heritage felt that the restrictions would prohibit developing a site in keeping with the area.

A further concern that I have is that the Residential Heritage Area could be too restrictive. I have a property at 2 Whisby Road, Cashmere which is in the Macmillan Ave RHA - a small cottage on a large site. I and my family

have had a long-term ambition to restore the cottage and to develop a another modern home close to the road frontage which I believe could be done without compromising the heritage value of the cottage and its setting.

Rolleston, Worchester, Montreal, Armagh

2 comments

Two respondent who live within the area expressed their straightforward support for the Residential Heritage Area, extolling the virtues of the historic houses in their area and noting the interest they have for tourists. This was part of one of the comments.

I could have demolished this old house after the 2011 earthquakes and undertaken a high density housing development but I elected to restore the house and retain the heritage quality architecture and street appeal. Thank you to the CCC planning department for introducing this RHA heritage exemption and protecting the Arts Centre precinct from high density infill. I fully support the Heritage plan change.

Heaton St (Heaton)

2 comments

One respondent called for designating the entirety of Heaton Street (rather than just the eastern side) as a Residential Heritage Area, arguing that both sides of the street were crucial to its character and appeal.

Another respondent took a different stance, arguing that defining Heaton Street as an RHA is inappropriate, given that St Georges Hospital has been allowed to encroach on much of this valued heritage area already, and that many heritage homes have already been lost in the earthquakes.

Taylors Mistake Baches

1 comments

Strong support was expressed by the Taylors Mistake Association for all Taylors Mistake baches to be added to the Schedule of Significant Historic Heritage to ensure they were protected for future generations.

Wayside Ave

1 comments

An extensive piece of feedback expressed general support for Wayside Ave's designation as a heritage area and suggested various ways in which its heritage value could be maximised. These included signage regarding the history of the street and its houses, road safety improvements to minimise speeding and through-traffic, upgrading water infrastructure and footpaths, and controls on street frontage to ensure the aesthetics of the street are maintained. They also queried whether any controls (such as soft boundary plantings) are in place to minimise the impacts of three-storey developments immediately around the heritage area, expressing concerns that this would detract from the street's aesthetics and heritage value.

RECOMMENDED HERITAGE LOCATIONS

158 COMMENTS

Riccarton Bush

56 comments

A substantial number of respondents sought protection for the heritage of Riccarton Bush and wanted the protection extended to the surrounding area. This was the most frequently commented on individual area of PC 14 feedback process.

There were two components to the protection that was sought. One was the ancient remnant podocarp forest that still stands, characterised by the 300-year-old kahikatea trees along with tōtara, mataī and hīnau. The second component was the buildings and history which remain from the settlement of Canterbury, in particular linked to the Deans family. Respondents wanted this area protected and felt that the imposition of large buildings close to the area would bring with them significant negative impacts including ground disturbance both during construction and ongoing, shading of natural areas affecting flora and fauna, wind tunnelling effects from high buildings as well as the aesthetic and visual impacts on a special Christchurch area. This comment exemplifies the arguments included in multiple comments.

We need to protect the city's oldest Heritage site.

Riccarton House and Bush / Pūtaringamotu is a unique New Zealand heritage site consisting of two historic buildings, flanked by beautiful open parkland and ornate gardens, bordered by Ōtākaro / Avon River and set against extensive native bush forest featuring kahikatea trees up to 600 years old

Riccarton Bush is probably the oldest protected natural area in the country. It is a reminder of what the Canterbury Plains would have looked like before human settlement. The trees are mostly kahikatea (between 400 and 600 years old), totara, matai, kowhai, hinaiu and other species. The dense stands of kahikatea and the birdsong, which echoes through the bush, will be lost if we have development as proposed around the Southern perimeter of Riccarton House and Bush.

Before European settlement, Pūtaringamotu was a valuable source of food and timber for the Māori. From the bush they produced carvings and canoes, and preserved pigeons. The Riccarton Bush Trust is fundraising to improve the bush and promote the natural and cultural heritage for the 75,000 visitors they have each year. If the proposed plan is allowed to go ahead it will no longer be a tranquil bush but a backdrop to six storied housing development on the Southern border.

This comment focused on the visual and other impacts on the area.

The immediate skyline will change forever, destroying the current ambience and natural appeal of the area adjacent to the bush. The proposal appears to mean residential buildings could be built up to 6-storeys high without notification and/or resource consent. Such development so close to each other and so close to the bush and grounds is a dismal prospect. The mighty Kahikatea do not need competition from towers of concrete and cement.

This comment articulated views similar to many others:

Why would anyone want High Density Residential Intensification – three - six storey buildings around Putaringamotu (Riccarton Bush)? Putaringamotu is all that is left of the native forest that once covered the entire Canterbury Plains. We MUST protect this special piece of History / Heritage. Putaringamotu is of national ecological significance, and we need to protect the native fauna and flora. If there were three - six storey buildings around the bush, the loss of light could have significant effect on the trees and reduce the native bird population. We need to protect this taonga.

This was a specific example of the impacts on the surrounding area:

Our family has lived at 35 Rata Street, Christchurch for nearly 40 years. We are members of the Riccarton Bush-Kilmarnock Residents' Association and support their concerns as expressed to Council. Our home has just been proposed as a heritage site for both architectural and social history. It is one of the first houses built on land which once formed part of Putarikamotu (Deans Bush) and was part of the Deans' family property. It was named Te Whare Maukaroko (Peace House) by local kaumatua due to the work on peace and disarmament which has been carried out here. The house next door is the original house built on the corner of Rata St/Kauri St and will be sold and demolished next year. Under the current Council proposal a 3 storey high block of apartments could be built there. This would take most of the afternoon sun from our home and cause parking problems on these streets which is already restricted due to the proximity of Westfield Mall and Saturday Farmers Market at Riccarton Bush.

This was another argument in favour of increasing protection.

Riccarton with its many pre-war buildings (one of which we have just rebuilt in keeping), Riccarton House, John Brittan Stables House, Mona Vale and the Kate Shepard house make the surrounding area a heritage area. Maintaining the Totara/Ngahere Streets, the Kauri Cluster and Kahu Road seeks to maintain some vestige of heritage in the area. Again making the surrounding area Putaringamotu a Qualifying Matter would be easy to do ensuring our historic area is preserved, especially when so many were lost in the earthquakes.

Having a high density area close to Putaringamotu also detracts from Christchurch becoming a National Park City – something many organisations (including the University of Canterbury in the area) are striving to achieve.

Several respondents referred to the previous District Hearings Panel decision (2015) to protect the area in their argument and considered this further support for protecting the area.

Previous ruling by District Plan Hearings Panel - in 2015, many of the residents in this area, ourselves included, objected to changes to the District Plan allowing intensification of these streets. The panel ruled that intensification should not proceed - what has changed since 2015 to reverse this decision? We fully support the panel's decision that this area's amenity values are more important than intensification benefits.

Richmond

29 comments

The majority of these comments called for greater protection measures to be put in place around Richmond, particularly South Richmond, to connect the North Richmond and Chester Street character areas and ensure that the special value of the broader area was not lost. These respondents argued that the distinction between North and South

Richmond was “arbitrary”, with some noting that South Richmond was developed before North Richmond, with history predating the 1860s.

Several respondents outlined the heritage values of particular houses or streets, both describing their own homes or remarking on specific areas such as the Chancellor Street Heritage Houses and the residence built by Benjamin Oakes Moore. Streets which received specific mention included Harvey Terrace, Haywood Terrace, Alexandra Street, London Street, and Avalon Street.

The area is one of the last areas within Christchurch to maintain the tāhuhu kōrero and character from before the mid-1800s. This is rare in our city after so many of our precious and treasured heritage buildings were destroyed in the earthquakes. The area contains parks and waerenga where mature trees have grown over many decades. These trees provide nohonga for native birds who are also drawn to the area as a result of the neighboring Avon River. It is home to many colonial cottages, a lot of which were built over a 120 years ago. These beautiful buildings personify our history and architectural heritage, which is sadly now unique to our city.

Historic Places Canterbury, while accepting the need to remove height limits in some areas, stated their concern about the extent of the high-density precinct, noting that the current delineation could allow 20m buildings on Harvey Terrace directly opposite the Sutton House, adversely impacting its heritage. They requested Harvey Terrace’s current designation be reassessed, and suggested that the high-density zone should be taken from a central point like Cathedral Square, and should consider more factors than just distance, for example, the number of traffic lights along the walking route.

Several respondents also discussed their concerns about tall buildings blocking sunlight, affecting quality of life and potentially leading to the loss of the area’s mature trees, or noted that present issues with traffic congestion and lack of parking in the narrow streets would be exacerbated if intensification were allowed to occur.

A small number of respondents commended the Council for its inclusion of the Dudley Character Area, extolling the distinct heritage values, streetscape and community feel of the area, and observing that many residents have gone to considerable lengths and expense to maintain the heritage value of their homes. A few of these comments also supported greater retention of character areas, and noted that even with this protection some infill development would be allowed, calling for “robust protections to be put in place to avoid the degradation of these special areas.”

Residents of the Dudley Residential Character Area have had to adhere to the Councils’ Special Amenity Area rules and regulations in the last decade, to create a cohesive and uniform style across many streets. Now this and other areas are at risk of losing their unique character. The collective influence of these special areas contributes to the overall amenity and attractiveness of the city as a whole.

Papanui

27 comments

The majority of these comments called for the ‘Memorial Streets’ of Papanui – which are planted with trees to represent those lost in the Second World War – to be recognised as qualifying matters and protected as heritage areas. These include Alpha Avenue, Claremont Avenue, Condell Avenue, Dormer Street, Gambia Street, Halton Street, Hartley Avenue, Kenwyn Avenue, Lansbury Avenue, Norfolk Street, Perry Street, Scotson Avenue, St James Avenue, Tomes Road and Windermere Road.

Several of these comments were comprehensive and detailed the history of the plantings, the importance of the trees to residents and their value as a “living memorial” in educating future generations about those who died in the war. Respondents generally feared that as well as changing the character of the streets, the construction, increased traffic and changes in sun brought by tall buildings would drastically detract from the health of the trees. The following comments are typical of respondents’ frequently ardent views on the importance of the memorial trees:

Yes, intensification is needed, but we cannot erase history for it to happen. The Memorial Streets honour the fallen of Papanui. They fought for our freedom, and those of us living in these streets wish to honour those men by retaining the memorial streets.

Whilst we understand the Character streets have been chosen due to houses or buildings they contain, the significance of the memorial avenues is the trees that have been planted, not the houses themselves. It is already clear that increased traffic in these avenues is having an impact on these trees, as some are being replaced by the Council, but currently with the same type of trees to allow the continuation of these beautiful memorials. However without protection under the new act there will no longer be consideration for the impact on these beautiful trees, and another part of our heritage in our city will be lost.

Several respondents noted that these streets have previously been recognized in a 2016 hearing (regarding the proposed RMD zoning) as an area of special significance unsuitable for medium density, arguing that this decision was equally relevant to the current proposed changes and should preclude the area from being designated high density. The President of the Papanui Returned Services Association (RSA) offered a comprehensive response concerning the 15 'living memorials'. The respondent noted that these living memorials must be protected, but also acknowledged that the trees may need to be removed in order for remedial work to be done to the sewer and other facilities in these streets. If this is required, the respondent asked that new trees, perhaps natives, be replanted to keep the memorial alive, and that the RSA, families of the fallen, and local residents be given the opportunity to hold a blessing ceremony with due reverence to those whom the new trees represent.

Several comments also argued that the extent of the High-Density Residential Zone in Papanui was inappropriate and should be limited to closer to the commercial centres. These objections were generally based on the view that there were other heritage buildings and areas in the Papanui zone which should be valued and protected from surrounding intensification, and concerns about the impacts of intensification on quality of life for neighbouring residents, as well as increased issues with traffic and parking.

One piece of feedback from the community board expressed support for the Residential Heritage Areas, and strongly recommended that additional areas be considered for inclusion, including the original workers' cottages on Dover Street which are of historical significance.

St Albans - Woodville Street, Cleveland and others

8 comments

Several respondents advocated for greater character protection for certain streets in St Albans, while a couple expressed support for the character protections proposed, emphasising the value that St Albans' residents placed on the area's character and visual appeal.

One comprehensive submission focused on the Mays Road, Chapter Street, Weston Road and Knowles Street area – previously recognised as a special amenity area. The respondent argued that the area's mature trees, verges and gardens, as well the remaining traditional villas and bungalows, imbued it with a high standard of character and rendered it worthy of being protected from intensification under qualifying matters. They also noted that the 2015 Beca assessment did not cover this area.

One response described in rich detail the character of Woodville Street, with its greenery and old character bungalows that have been lovingly restored and cared for by its residents, who chose to live in Woodville Street for these very reasons. This feedback called for the protection of Woodville Street and others like it (including Edward Ave from Hills Road to Barbadoes Street, Geraldine Street and Cleveland Street from Edward Ave to Warrington Street, Barbadoes Street from Edgeware Road to Warrington Street, and Warrington Street from Cleveland Street to Hills Road).

One respondent also called for the protection of Cleveland St, Woodville St, Geraldine St, Mayfield Ave, and Edward Ave, while another warned that any Holly Road development would detract from the character of neighbouring Ranfurly Street (a character area) and a designated heritage building on Holly Road.

One respondent noted that safety was a concern if intensification occurred, noting that St Albans school was "already challenged".

Merivale

6 comments

The comments regarding Merivale all called for the area's "gracious character homes" to be protected. Two respondents argued that homes in the Merivale area (particularly Leinster Road) should be protected, particularly as many of the area's older heritage homes were already lost in the earthquake. One person also raised the value of ensuring the area's existing tree coverage remained.

Another respondent felt that character protection was insufficient, stating that St George's Hospital had been "allowed to encroach on the whole of this valued heritage area."

The Waimāero Fendalton-Waimairi-Harewood Community Board expressed their desire to safeguard the area's heritage, observing that so much had already been lost after the earthquakes. They requested that houses in the Merivale area be treated on a case-by-case basis, noting that the additional listed houses would likely differ in heritage value.

Please save the original character houses around Merivale & Strowan. There are large character houses on sections full of trees and greenery. They give this area its character and charm.

Spreydon and Barrington

6 comments

Respondents expressed their desire for the area around Barrington Mall to remain at its current density, arguing that it was inappropriate for intensification. A few of these responses described the area's family-friendly, community feel, which they felt would be at risk from infill housing and tall buildings blocking sunlight and intruding on privacy.

Concerns were also raised about the area's infrastructure – which was described as at capacity – being unable to cope with intensification and the potential for increased surface flooding. It was noted that traffic in the area was already heavy, particularly during peak hours, and that parking was limited, especially on narrow streets, and that intensification would make this “unmanageable”.

The intensification based on the model set out by the government will adversely impact on the neighbourhood. The infrastructure of services is already at full capacity. In heavy weather drains gurgle, and the street floods from excess stormwater coming in from Stourbridge Street. The road is small and narrow and is coming into disrepair from the increase in truck traffic.

A few comments mentioned Therese Street in particular, describing its “particular attractive aesthetic with large trees and the feeling of green space, and heritage 1930s/1940s transitional villas and architecture”, and arguing that tall buildings would detract from the street's character and residents' quality of life. One comment specified their concerns were in relation to the Therese Street, Wychbury and Stourbridge area.

Feedback from the Waihoru Spreydon-Cashmere Community Board offered the suggestion that “heritage values should not just be measured through significance of the buildings and features to one particular era, but also how a particular area could demonstrate 'passage of time' heritage through multiple eras”, using Sydney Street in Spreydon as an example of this.

Somerfield

4 comments

Greater protection measures were suggested for Somerfield. The area's attributes were described by one respondent, who stated:

Consideration should be given to the special character of Somerfield, there are many villas and tree lined streets and having 12 metre builds in this area will definitely destroy the character of the area.

One respondent wanted more qualifying matters introduced to exclude certain streets or areas from further intensification, for example, some older, original streets with significant historic homes in the Somerfield area. This respondent also argued that tall fences should not exclude houses from being able to achieve heritage status. Streets noted by this respondent included Roker Street, Rose Street, Penrith Ave, Leitch Street, Studholme St, and Ashgrove Terrace.

Meanwhile, another respondent also wanted to see Roker St between Selwyn and Strickland considered.

Lastly, one response was made expressing general opposition to infill housing and subdivision in the Somerfield and Lower Cashmere areas, stating that recent developments of one or two storey flats are already affecting the area's “open and uncluttered” nature. They recommended that the rules for Character Areas remain as they currently stand.

Riccarton

3 comments

Three comprehensive submissions, two from the Waipuna Halswell Hornby Riccarton Community Board and one in an individual capacity argued that the proposed high-density zoning in Riccarton was inappropriate, with the Community Board stating they strongly opposed it on the grounds that the proposed changes would “destroy the area's character.” The submissions highlighted various heritage features in Riccarton and argued that these aspects, especially when coupled with concerns about effects on community and residents' quality of life, should be considered qualifying matters and current density should be retained.

Riccarton in particular is a foundation borough and has significant heritage features that need to be recognised and protected from the type of intensification proposed. As noted above the proposed changes are regarded by many residents as a breach of trust of their "good faith" investment in the area.

Heritage items in the area were listed, including: Riccarton House and Bush, Deans Cottage, the original Christchurch Boys' High School Buildings, the original Riccarton estate farm buildings; the War Memorials at Jane Deans Close and Boys' High School, the Kahu Road bridge, 35 Rata Street (requesting heritage status), Mona Vale, possibly Britten Stables in future, and the Riccarton estate farm buildings. It was also noted that, as well as the protected trees, there were

numerous other trees and character pre-war housing, contending that heritage should be defined more broadly than simply whether sufficient housing has retained its original character.

Both respondents pointed out that two areas had retained their low-density status through the 2015 Hearings Panel process (St James/Condell Avenue and the northern side of Riccarton Road), suggesting this recent decision should constitute a qualifying matter.

There was considerable stress on the community at that time and they now feel highly concerned to be going through this again. The Board supports the view of residents that this should be accepted as a “qualifying matter” (Section h) given that the appropriate density was so recently judged by the Independent Hearings Panel.

Hornby and Hei Hei

3 comments

Three comments, one of which came from the **Waipuna Halswell Hornby Riccarton Community Board**, suggested that Hornby and Hei Hei have character areas similar to those identified as Residential Heritage Areas, and should be recognised as such. One respondent raised the point that proposed heritage zones appeared to be concentrated around more affluent areas, stating:

...There don't seem to be many Qualifying Matters that apply to the Hornby, Hei Hei area. The preservation of certain housing areas seems to be based on well maintained architecturally designed houses for people with very high incomes. How about the city preserving an area of a well designed State housing that achieved its aim in the 1950s of providing warm affordable rental housing and a place to grow the veges for workers and their families. Such a place could be a rare historical place of interest in the future.

The Community Board added that:

The Board considers that there is not sufficient foresight being given now to areas that may become character or heritage areas in the future if their character is not undermined by allowing the type of intensification currently proposed.

Sydenham

3 comments

Three respondents cited Sydenham's heritage and amenity values and their desire for this to be recognised. One respondent stated that Rogers Street in particular should be a character overlay area due to the number of character homes along the street, some of which are built in 1905.

Barnett Ave Pensioner Cottages

2 comments

A detailed piece of feedback recounted the history of the Barnett Ave Pensioner Cottages in Sydenham Park, noting their historical and social significance as the first pensioner flats constructed by the Christchurch City Council, and as the first elder housing initiated by a local authority in New Zealand. This feedback highlighted that the flats are also amongst the first old age pensioner cottages developed in this country, and therefore occupy a significant place in the history of public housing in New Zealand.

As well as the reasons mentioned above, this respondent also discussed the likely archaeological significance of the site, and the fact that the flats have some technological or craftsmanship significance as examples of standard technology and workmanship of the time (1930s).

This respondent, along with one other, called for the Barnett Avenue Pensioner Cottages to be appropriately protected to ensure that their history and character live on.

In addition, responses from two organisations, Historic Places Canterbury and the Christchurch Civic Trust, also wanted to see these pensioner cottages protected.

Waitai Coastal-Burwood Ward

1 comment

Feedback from the Waitai Coastal-Burwood Community Board emphasised Christchurch's identity as the 'Garden City' and stressed the importance of preserving the city's gardens and trees, both exotic and native, as these are an important part of the city's character. The Board also noted that it wants to see more protection and scheduled maintenance for trees of significance, and to see more trees added to the Schedule of Significant Trees, including trees that have been identified by communities as important to them – many of which have existing plaques.

Hagley Park and Dorset

1 comment

Feedback from the Christchurch Civic Trust emphasised the significance of Hagley Park and the importance of ensuring careful control of intensified housing around the park. In particular, this feedback referenced the approval in 2021 of the Ryman Healthcare development on its Bishopspark and Peterborough sites, noting that heights approved by the two Commissioners were considerably above permitted Christchurch District Plan limits.

They also expressed support for protecting specific areas of the city for their collective residential value, noting that the earthquakes have meant areas such as Park Terrace have lost major heritage buildings and streetscape features.

Linwood

1 comment

The Waikura Linwood Central Heathcote Community Board offered a submission suggesting that all of Chester Street East should be a Residential Heritage Area to give the community a sense of continuation. They also suggested that:

...provision should be made for interim protection of areas and sites with potential heritage values to allow time for necessary in depth investigation to be undertaken before their values are undermined or lost by inappropriate development.

Kilmore and Barbadoes streets

1 comment

One respondent suggested the buildings and sites at 347 Barbadoes Street and 278 Kilmore Street be assessed as potentially Significant / Highly Significant / historic heritage, with a view to being scheduled as such if found appropriate.

Waimāero Fendalton-Waimairi-Harewood Community Ward

1 comment

Feedback from the Community Board asked the Council to ensure that the residents who will be impacted by these changes (i.e. now own or live in heritage homes in the Fendalton area that are newly identified) are proactively informed and engaged with.

Corner of Fitzgerald and Gloucester

1 comment

One respondent exhorted the Council to ensure that any heritage protections have “real teeth” to avoid the RHAs being “rendered meaningless,” describing a shop on the corner of Fitzgerald and Gloucester which has been (purposefully, in their view) allowed to run into disrepair and which would likely be demolished as a result.

Sumner

1 comment

One response was made in which the respondent argued that it was “appalling that CCC is considering removing some areas”, mentioning the Clifton and Esplanade Character Areas in particular, and arguing that previous restrictions on should development should have been more stringent to ensure these areas were retained. They expressed their disappointment that so many heritage buildings had been demolished and felt that the proposed changes would result in further loss of Christchurch’s character, as well as diminished trees and green space.

Phillipstown

1 comment

This respondent argued that Phillipstown, along with other residential suburbs across Christchurch, is not suitable for high-density infill housing. Phillipstown was described as a “foundation community” which is home to “many old-style villa houses as well as other homes dated back more than 100 years”. They were opposed to these houses being demolished and replaced by high-density buildings on single sections, which they viewed as destroying both heritage and green space, arguing that developers were more motivated by profit than by protecting the history of a community.

Ferrymead

1 comment

Ferrymead’s suitability as a heritage area was discussed by one respondent, who also raised problems and inconsistencies around the planning and consultation process. The respondent had received a letter in April stating Silvester Street was part of an RHA, but upon consulting the online map this was found not to be the case. They felt the process and online information was unclear and difficult to navigate, noting that this was likely to deter people from submitting.

They argued that this area, close to the Heathcote River, should be an RHA based on its history as a key transport hub (ferry and rail) for early settlers. They were also distressed that the changes could allow new high dwellings to “tower over me and add huge amounts of noise and traffic to our street where parking is already an issue.”

Civic Trust List - various places

The Civic Trust expressed their support for the inclusion of various items and buildings, and suggested the following for inclusion:

- Upper Riccarton War Memorial Library Info Agenda Item 9, 10.02.2022
- Woodham Park Former Caretakers Residence - an example when Caretakers were living on site.
- Barnett Avenue Pensioner Cottages
- The Inter War Bridges (The Victorian Bridges are already protected)
- Carlton Mill Bridge
- Hereford St Bridge
- The Princess Margaret Hospital: although earthquake damaged the only major surviving building of the period / style; of great significance locally and more widely. Retention of this building complex is very important in cultural and environmental terms.

Historic Places Canterbury – various places

- Upper Riccarton War Memorial Library
- Woodham Park Former Caretakers Residence- an example when Caretakers were living on site.
- Barnett Avenue Pensioner Cottages
- The Inter War Bridges: (The Victorian Bridges are already protected)
- Carlton Mill Bridge
- Hereford St Bridge
- Former High Court building, Durham Street, 1989: (with a detailed description of the building's architectural significance as a surviving example of the Ministry of Works design office's last phase.)
- Princess Margaret Hospital 1952-1959: (with a detailed description of the building's history, concluding with a statement of its significance as a building that "exemplifies the role of the state in the post-war era in reinforcing the values of the welfare state through the extension of high-quality health care to all New Zealand citizens. Its naming after a member of the Royal Family who enjoyed considerable popularity at that time is also illustrative of New Zealander's attachment to the British Monarchy in the 1950s and 60s, at a time when Royal Tours could still bring the nation to a standstill.")

NATURAL FEATURES AND ENVIRONMENT

73 COMMENTS

Concerns that established tree areas will be damaged

40 comments

A considerable number of respondents discussed the impact of development on natural areas, particularly groups of trees or, in the case of Papanui, a collection of streets planted as a memorial to war veterans.

More than half of these comments focused on Riccarton Bush and the protection of the ancient trees in that area. This was one of the comments discussing protection of this area for nature conservation reasons, arguing that a buffer zone must be in place to protect the tree roots.

The territorial authority should be identifying all the qualifying matters that may apply to a site or feature to provide for it "to the extent necessary".

Where Pūtarīngamotu is concerned, the Board considers this area must include at least the long-recognised buffer for the protection of the root zones of trees within Pūtarīngamotu from damage caused by development on neighbouring sites. But importantly, it should extend to the further buffer area identified above (22m for intensive building development) that would also apply at Pūtarīngamotu. This is seen as necessary to provide the protection that s.6 requires for Pūtarīngamotu from the proposed and enabled intensification.

Additional qualifying matter – significant trees. As well as the Bush's protection being of national importance, the additional qualifying matter that the Council intends utilising – significant trees – must also capture the Bush, with the mechanism for protection (setbacks from significant trees) already part of the existing District Plan methods. The issue for the Board is that the absence of the recognition of that protection in graphic form

on the planning map, means that the setbacks can be overlooked or just treated as another matter to be dealt with under a resource consent for new development.

This is a small part of the comment provided by **Riccarton House RBT** providing a detailed description of the negative environmental impacts that would come if greater intensification was allowed.

...affecting mature tree root systems, both structurally and in terms of the volume of soil they are able to absorb nutrients and water from, leading to tree ill-health and potentially dieback in Pūtaringamotu.

b) affecting soil hydrology and particularly the lateral movement of water through the soil, which will lead to reduced water available for native vegetation within Pūtaringamotu.

1.2 Loss of greenspace adjacent to Pūtaringamotu through increasing site coverage and reducing the minimum site size. With intensification it is proposed to increase site coverage from a maximum of 35% to 50%, and to reduce minimum lots sizes from 450 m² to 400 m². In addition, the intensification rules suggest that the area of green space only needs to be 20% of the site. In total this will have adverse impacts on Pūtaringamotu in several ways:

a) It will reduce the amount of habitat (especially trees) for native fauna, especially as corridors for bird movement. This will have significant impacts on mobile fauna such as kereru, korimako and tui which require areas larger than Pūtaringamotu, and the ability to move between different areas, for viable populations.

b) Further affect soil hydrology by reducing the amount of soft/green permeable surfaces through which rainfall can percolate into the ground, with a much greater area of water being lost via hard surfaces into the storm water system. This will lead to reduced water available for native vegetation within Pūtaringamotu.

1.3 Erection of large buildings adjacent to Pūtaringamotu altering local microclimates.

This will have direct impacts on the vegetation and hence habitat quality for flora and fauna proportional to the height of structures by: a) Shading parts of the bush, thereby reducing photosynthesis. b) c) d) Creating potentially strong wind funnelling effects that can cause increased transpiration from foliage and potentially cause physical damage. Leading to increased air temperatures due to urban heat island effects. This again can affect plant photosynthesis and respiration in the bush.

Increased light pollution from taller buildings impacting bird, gecko and insect populations within the bush.

Long and descriptive comments were provided explaining the history of the 15 Memorial Streets in Papanui and the historic and ongoing importance they hold. A personal account described sitting amongst the trees to remember a veteran who had recently died. These respondents felt that protecting the integrity of these trees was important to honour past sacrifices along with the initiative to create the memorial. This was a small part of one of the comments:

The 15 Memorial Streets that sit within Papanui require protection for now and future generations as they speak of the sacrifices made both at war and home, they tell the story of this time in history from the perspective of the of the ordinary person, the one that worked in the pea factory, Firestone and Sanitarium and other "blue collar" industry in Christchurch.

Other comments emphasised the value in protecting mature trees stands in other areas across Christchurch, such as this respondent from South Richmond:

South Richmond is my kainga and it has been to my whanau for many generations. The area is mauri to Christchurch for many reasons but mainly due to the history and heritage it embodies. The area is one of the last areas within Christchurch to maintain the tāhuhu kōrero and character from before the mid-1800s. This is rare in our city after so many of our precious and treasured heritage buildings were destroyed in the earthquakes. The area contained parks and waerenga where mature trees have grown over many decades. These trees provide nohonga for native birds who are also drawn to the area as a result of the neighboring Avon River.

Support for tree protection (also see financial contributions section)

19 comments

There was general support for the protection of trees in a moderate number of comments. Note there were significantly more comments which discussed trees in the section immediately above, and the Financial Contributions section (below). Many of these comments were short statements describing the value of trees and what will be lost if excess development occurs without taking necessary precautions. This was a typical comment:

The gardens, trees, large sections and community that is present in many areas of Christchurch will be lost through intensive development that restricts sunlight, kills green space, trees and gardens and removes a sense of community belonging.

This was another comment which discussed trees as a qualifying matter.

Qualifying matters should be strengthened by increasing the area of tree canopy required, greater protection for wider special character/heritage and the application of financial contributions that truly reflect the cost of adverse effects imposed through this plan.

Support for protection of natural features such as waterways

11 comments

Several comments were received which discussed natural features and a desire for them to be protected, with some directly stating that they should be protected as qualifying matters. The following comments are examples:

As such I repeat my request that you agree that all sections directly adjacent to any city waterway (river, stream, creek, lake, or pond), should be classified as areas unsuitable for increased housing under the Qualifying Matters category.

The "qualifying matters" should take river protection and ecology much more into consideration. Intensified development along the Heathcote River is almost certain to have a negative effect on river quality. The Beckenham Loop is a very "green" area of the city; it is part of why Christchurch is known as the Garden City. Intensified housing would mean many trees would be lost – trees that serve as homes for nesting native birds that come down from the Port Hills.

Permeable surfaces

3 comments

A few comments identified permeable surfaces as an issue. These comments generally opposed covering soil with hard surfaces.

The environmental impacts of more land being blanketed with concrete and asphalt, leading to more pollutant rich storm water being poured into the waterways of our city, and the risk of urban heat islands developing in the concrete jungle.

CONCERNS ABOUT LOSS OF SUNLIGHT

29 COMMENTS

A considerable number of respondents discussed the significant detrimental effects of tall neighbouring buildings blocking sunlight, arguing there should be greater restrictions around this or that wellbeing should be considered as a qualifying matter.

Children also need safe places to play outside the home but safely on their own properties so they can play independently (e.g. not relying on caregivers to take them to the park!) The ridiculously narrow scope of Qualifying Matters is an affront to the health and wellbeing of every resident in existing suburbs, and the adoption of climate-related low-impact behaviours (as above). Set-backs and shade planes must be increased substantially and no 12m high buildings should be built in existing suburbs next to single story residences.

There should be several strict rules around builds. If a multi storey building went up next to the home I own it would block all my sun making my house cold, damp, costing more in electricity bills etc. absolutely disgusting.

A couple of respondents explicitly stated that the loss of sun to solar panels should be a qualifying matter. This was one of the comments:

I would like to see other qualifying matters, such as whether there are houses that have invested in solar power. It's possible that some developments could mask the sun from solar panels on the roofs of neighbouring properties, making the investment wasted and the ability to sustainably power homes impossible. I also think that our trees should be better protected, not just listed trees but trees above a certain size.

INFRASTRUCTURE CAPACITY AND FLOODING

23 COMMENTS

Around three quarters of these comments expressed concern that Christchurch's infrastructure does not have the capacity to cope with increased development. Some referred to old and damaged pipes, or noted that flooding already occurred in severe weather events. Respondents suggested that infrastructure capacity should be considered a qualifying matter or reason to restrict development. These were a couple of the comments:

Building up is not the only answer but it appears that Govt and some in local Govt seem to see this as an easy answer without fully understanding the consequences unless they are right in front of their eyes while they make these decisions. Reality is there are serious issues and problems that will arise from this but they may take a number of years to reach the surface and by then it is too late

Aging and damaged infrastructure should be included as a qualifying matter. I may add that it would be ill advised for Council to minimise or discount the actual and potential issues related to the current state of flux about three waters reforms and gambling that someone else may pick up the tab to fix infrastructure to support intensification.

Proximity to sewerage or recycling areas was suggested as a qualifying matter by one respondent.

KiwiRail identified the benefits in co-locating housing near transport corridors but identified reverse sensitivity as an issue which needs to be protected against, and they proposed that buildings built within 60m of rail infrastructure to be built in a manner to mitigate impacts.

CONCERNS ABOUT SEISMIC RISK, NATURAL HAZARDS, AND LAND QUALITY CONSIDERATIONS

19 COMMENTS

The impacts of the Christchurch earthquakes were fresh in the minds of these respondents. There was a desire to avoid repetition of the events of 2010 and 2011 by taking appropriate precautions, in particular avoiding building on TC3 land. There was also concern that broken pipes from previous earthquakes are still underground. The ongoing social and psychological impacts of earthquakes were significant for some people and avoiding these impacts was considered important.

This was a comment from **Waipuna Halswell Hornby Riccarton Community Board**:

The Board queries whether the major earthquake sequence suffered by Christchurch in 2010/11 should be regarded a qualifying matter? Residents of Christchurch are understandably concerned about increased height of buildings proposed by the intensification not only because of the actual earthquake risks of taller buildings, but also the psychological effects of these buildings on residents who have been severely traumatised by the earthquake experience. The Board believes strongly that this should be accepted as a qualifying matter and that Christchurch should not be subject to the proposed intensification requirements.

This was another comment about the risks of TC3 land in Richmond:

Much, possibly all, of the land identified for intensification in Richmond South was labelled TC3 following geotechnical surveying after the February 2011 earthquake. Foundation types, for example re-level-able slabs and deeper piles have enabled housing to be rebuilt or repaired within this zoning. Nonetheless it remains prone to liquefaction in any future earthquake event. Foundation types may protect a building and inhabitants however up to six stories on this type of land seems counterintuitive to me. Liquefaction such as that experienced in this same area in 2011 would in the future see many more people displaced or at risk. In 2011 liquefied matter was removed from properties onto the adjacent streets from where it was then removed.

A few other comments were also made about natural hazards, in particular risks from flooding.

Waipuna Halswell Hornby Riccarton Community Board made this comment:

2.4 The Board considers that there needs to be provision for a range of other matters that render areas of Christchurch unsuitable for the type of intensification proposed. These matters include land stability and the height of the water table in some areas as well as the capacity of infrastructure such as roading to cope with additional development particularly in areas of already rapid growth such as Halswell where there is evidence

that roads are already struggling to cope with the traffic generated by the growth. The Board notes that the removal of the requirement for developments to provide on-site parking is already causing parking and traffic issues in suburban streets and that this is likely to become much more severe with the proposed allowable intensification.

CONCERNS ABOUT LOSS OF PRIVACY AND VIEWS

8 COMMENTS

Several respondents objected to high buildings being allowed in current low-density residential areas because of the subsequent loss of privacy and potential loss of views.

OTHER QUALIFYING MATTERS SUGGESTED BY RESPONDENTS

4 COMMENTS

A small number of other specific qualifying matter comments were made, with one suggesting they should be generally stricter. Another respondent posed primary school pick up areas as a qualifying matter due to the risk caused by traffic congestion. They believe that apartments would exacerbate an already challenging issue.

Te Whare Roimata and the Latimer Community Housing Trust suggested social factors as a qualifying matter.

We particularly refer to the role the ICE/Linwood West neighbourhood has played in providing essential, low-cost private rental housing for single people of limited means. Such housing is not easily found elsewhere in the city. Our experience of intensification in recent years has seen growing gentrification of the western end of the Inner City East, replacement housing being targeted at higher income earners with little commitment to community life, the particular loss of single person rental housing for people of limited means, rising rents and increased demand for the diminishing supply of low cost housing... We firmly believe there is a strong case for social considerations to be added to the list of qualifying matters so that existing neighbourhoods which contribute to housing a particular population grouping such as the single poor are seen as unsuitable for housing intensification. This would mean areas such as the ICE/Linwood West are essential candidates for such protection from intensification

BROAD TOPICS

65 COMMENTS

A broad range of other comments were also made in response to the qualifying matters which were not always directly linked to the issue. Below we discuss the comments which were directly or indirectly focused on qualifying matter issues.

Concerns about worsening traffic congestion

14 comments

These comments generally observed that traffic is getting worse and will continue to deteriorate with increased intensification. A few noted this as an issue for emergency service vehicles.

This comment was made regarding traffic capacity and a qualifying matter.

1. An additional Qualifying Matter should be added: Housing on Primary Traffic Routes should be restricted to like for like, no intensification.

For example, there are already problems on roads like Brougham Street, where adding more traffic from driveways would slow the passage of traffic flowing along the roads, cause more accidents and hinder any public transport using those roads.

Calls for increased consenting requirements

13 comments

Several respondents stated that resource consents should be required for more circumstances. This comment is a good example of the sentiment in the majority of these comments:

Neighbours of a property being redeveloped should be able to have a say on how the proposed development will affect their property and way of life so a resource consent should be required.

Waipuna Halswell Hornby Riccarton Community Board suggested the criteria for qualifying matters was too high under the NPS-UD and that resource consents should be required in more circumstances.

Increased development that is enabled by The Act. While the proposed changes provide "Qualifying Matters" that mean rules enabling increased development will not apply, or the level of increased development is limited and remains subject to resource consent approval, the Board notes that strong evidence is required for something to become a Qualifying Matter and considers that the threshold for qualifying matters is too high with the NPS-UD criteria for Qualifying Matters including matters of national importance, nationally significant infrastructure, heritage and public open space and 'other matters' as grounds for restricting development requiring a significant evidence, including site-by-site evaluation and full consideration of what housing or business capacity is likely lost by stopping or limiting more homes from being built and an options analysis for how higher densities can still be achieved.

Concerns about insufficient parking provision

9 comments

These respondents were opposed to off-street parking not being provided because they felt it would increase congestion and infrastructure impacts.

Support for strong qualifying matters

7 comments

A small number of comments generally called for greater limitations on development or stronger qualifying matters. One respondent discussed qualifying matters, urging the Council to:

Make them really strong and enforce them.

Calls for greater consideration of community wellbeing and mental health

6 comments

These comments were fearful for the denigration of communities and quality of life. This comment specifically focused on these factors as qualifying matters:

I don't think the Qualifying Matters of the "Resource Management (Existing Housing Supply and Other Matters) Amendment Act" go far enough. Some attention has been given to "ensuring safe or efficient operation of nationally significant infrastructure" (clause e), "open space provided for public use" (clause f), heritage land (clause g) and business land (clause i). Compliance of these matters should be the brief of Council as part of their everyday stewardship of our city. What needs to be protected is the quality of life of everyday ratepayers.

While the comment below didn't directly mention qualifying matters, it highlighted that freely allowing development may not meet the social or economic needs of the people who will live in these new buildings, and that development must be accompanied by services and facilities:

These proposed buildings WILL house whanau, with small and school aged children. WHERE are they going to school, ece, medical centre, playgrounds, exercise facilities. Just building three story residential boxes will NOT meet the emotional- socio or economic needs of people. They need appropriate services nearby that they can walk to or take public transport. These ARE NOT going to be full of students and professionals. These types of buildings will attract families who need space to grow and thrive.

Concerns about potential negative impacts on the property market

6 comments

Property market comments included the argument that building more houses won't result in increased affordability and instead will be more beneficial for investors. One respondent asked for the number of small units on a property to be restricted to limit the development of Air BNBS. One respondent contended:

This intensification will benefit investors, not first home buyers, as apartment dwelling is not usually high on the wish list for families and neighbours impacted by having a highrise apartment next to them will not be able to sell and no one would want to own and live in a home that has lost its sunlight, so owners will have to rent out their property, or sell at a lower price to an investor, who will then rent it out.

Comments about council response to government approach

6 comments

A small number of respondents argued that Christchurch has different circumstances to other cities, such as being post-earthquake and having more vacant land. A few respondents requested that the Council push back on change or apply for different requirements to be applied to Christchurch. This was one detailed comment discussing this issue:

The Qualifying Matters need to be more creatively applied to protect residential neighbourhoods in Christchurch from destructive and intensive development.

There appears to have been no/minimal consideration given to the increased traffic, roadside parking and infrastructure requirements of intense development in residential areas. Many residential areas (including my home area of Beckenham) was never designed for such intensive housing and traffic. ...

What modeling has been done to understand the impacts of the intensification on residential areas currently designated as residential suburban? How many extra houses/apartments will be built in areas with high prices that will be unaffordable for the majority? At what level will an oversupply issue become our reality? There is already significant debate as to whether Christchurch already has an oversupply of housing. Building more houses won't simply make housing more affordable - that is not how market pricing works.

The proposed Qualifying Matters do not restrict intensified development in anyway near what is required. The Council needs to be creative and far more thorough in their consideration of how to protect residential Christchurch.

Support for retention of 'garden city' identity

4 comments

These comments supported retaining Christchurch as the garden city by protecting trees. One respondent made the point that a native tree corridor is necessary to encourage native birds from the Port Hills to the CBD.

Noise concerns

3 comments

A couple of general comments were made regarding the negative impacts of noise.

ECAN-Canterbury Regional Council made this comment.

Intensification near the Depot is likely to result in reverse sensitivity from noise effects, CRC would consider it appropriate to include If CCC determine that increased this as a Qualifying Matter. Limiting intensification in these areas would then support the efficient operation of the Port, and this would be consistent with the objectives and policies of the CRPS noted above.

Concerns about incompatibility (height) within neighbourhoods

3 comments

A few comments were provided in support of low-rise residential housing, with this respondent expressing fears that the proposed changes will result in over-intensification:

The qualifying thresholds are set so high that they facilitate over intensification in suburban areas. They need to be significantly lowered in order to prevent over intensification. My concern is that the proposed CCC qualifying thresholds will not adequately protect residential areas from ugly Stalinist high rise blocks and the ruination of what was once known as 'a garden city'!

CCC encouraged to reject NPS-UD rules

3 comments

A few respondents in this section encouraged the Council to reject the NPZ-UD. One very long response outlined the issue of current housing supply and arrived at the conclusion that the changes directed by the NPS-UD were not required.

Risk of profit ahead of quality

2 comments

A couple of respondents stated that the commercial desire of developers must be tempered by ensuring quality outcomes are delivered. This was one comment:

The proposed thresholds for needing resource consent are way too low and will most probably result in the development of inner city ghettos of dense housing that nobody wants to live in but are forced to because the cost of commuting from the outer regions with no public transport will be too high. A few rich developers will create these ghettos at the expense of everyone else.

Accessibility and functionality

2 comments

A couple of comments didn't directly refer to qualifying matters but made comments that encouraged functional buildings for all. One comment emphasised that greater provision should be made to ensure buildings are accessible for those with disabilities.

The Board considers that the Building Act requirements for standard of access for people with disabilities are extremely inadequate. The Board would support requirements that enabled greater accessibility in buildings, for people with disabilities and that in local developments a percentage of the buildings meet Lifemark Standard Five for accessibility.

Design standards

2 comments

Two comments discussed design standards. One of these was in the context of living and wellbeing requirements, noting that these needed to be culturally appropriate for non-European ethnic groups:

Suitable Design should be a Qualifying Matter .

a, Size and Design of modern housing is culturally unsuitable for non-European ethnic groups: eg. toilet and laundry are too close to food preparation and eating areas. There is insufficient communal living space for social get-togethers. Housing is not big enough for extended- family groups.

b. Small townhouses and apartments have bedrooms which are not much bigger than a jail cell. How can this be good for mental well-being ?

c. There is insufficient storage available, especially when there is no garage with the property.

No garage also means that cars are at greater risk of being broken into and/or stolen. Vulnerable (who can only afford the minimum) are made more vulnerable.

d. Lack of car parks make the dwellings socially-isolating : ie. no visitors, difficult to access for medical/emergency help

The other comment suggested new builds should have to be sympathetic to its environment:

I suggest that a permitted activity rule be developed that requires new builds and amendments to existing buildings to be sympathetic to the area. This could include specific design briefs or material specifications

Areas will devalue in the future

2 comments

A couple of comments referred to areas or individual homes being devalued by developments, which one described as a seizure of rights.

Intensification will occur naturally as people die. Don't remove their rights to maintain the quality of their investment and lifestyle by your seizure of their rights.

Section sizes and distances

2 comments

This comment identified a potential issue with driveways being used in total section size calculations.

I think there are quite a few back sections in Chch. I.e Sections with long driveways to access lots in behind others that will take advantage of these rules by using their driveway size (sq/m) to get away with building bigger homes on sites where the actual usable area is significantly smaller than on paper. If a 60sqm driveway (not uncommon) is included in the overall usable site coverage (even though it's purely an access point), then the site coverage/outdoor requirement rules you have in play could allow for builds that are far too big for the usable site area, and negatively impact multiple surrounding homes. (Generally these sites are bordered by homes on all boundary's).

This comment referred to small sections that should be exempt from development.

CCC should acknowledge that some inner-city sections are inappropriate for intensification. Many houses are on sections that are only 10 metres wide and/or approximately 300 square metres. These sections should be exempt from the proposed intensification; nor should they be allowed to be aggregated with adjoining sections to achieve a larger building site to more readily enable buildings of 20+m .

School capacity and zones

1 comment

This comment stated that the capacity of schools should be considered in the ability of an area to grow.

'School zones'

Cashmere High School and Somerfield School are at maximum roll capacity already, and with further housing intensification, these schools may need to reduce their zones further. Unfortunately, both schools have little capacity to extend their student roll much more so this may affect some students' ability to commute to these popular schools. Please consider effects that increasing an area's population dramatically has on various school zones.

Decrease Qualifying Matters

79 comments

CHARACTER AND HERITAGE

9 COMMENTS

City wide perspective

9 comments

Several respondents wanted the extent to which qualifying matters can be applied to restrict development reduced in character areas. The sentiment in these comments was, broadly, that more development should be allowed in these areas, and that this should apply city wide.

The state of the heritage offerings in Christchurch was variously described by these respondents as sorely in need of repair/renovation, as having a finite lifespan, as being patchy at best (in terms of there being areas that could be clearly defined as character areas), and as having already been subject to "wholesale" destruction post-earthquake/s.

The point was made that the costs associated would be prohibitive if character was deemed a qualifying matter, the following comment articulates this clearly:

The proposed Heritage related Plan changes would effectively increase regulatory and financial burden on all property owners within the proposed RHAs, irrespective of whether the house had a heritage listing or not. Ambiguous terms such as 'defining' or 'contributory' buildings render unlisted houses as potential heritage items without the owner's involvement or consent. A house that is not listed as a heritage item could, essentially, be treated as one at the full discretion of the Heritage Team / CCC. This places unexpected new regulatory and financial obligations on owners, significantly more so than they currently have.

A few of these comments were succinct, including the following two:

We support intensification opportunity within the Residential Character Areas.

It seems a bit questionable whether private heritage areas should be preserved.

A few others noted that modern houses fit well in an urban streetscape amongst examples of heritage houses, making the point that heritage areas should be able to be developed by owners if this is their preference.

Our area has had a significant number of houses pulled down and replaced with modern houses. A city is supposed to grow and develop organically.

One respondent made a detailed argument that, owing to the particularities of Victorian houses (including their typically higher than average heights), modifications to structures can rarely meet height or recession plane restrictions. Consequently, this respondent felt that "new recession plane and height limit rules be applied to heritage areas" to allow heritage-sensitive design to be applied to existing heritage buildings.

IDENTIFIED HERITAGE LOCATIONS

12 COMMENTS

Shands, Peveler - Riccarton (Piko)

5 comments

These comments all called for heritage protection to be reduced in this area, contending that the state of many of the buildings rendered them unworthy of heritage protection, while the busy location meant they were ideal for redevelopment. All respondents mentioned specific properties on Piko Crescent or Peveler Street and explained why they were unsuitable for inclusion in the heritage zone.

Reasons included existing non-compliant modifications along the streets, the amount of rented properties and student accommodation (described as "messy" and "neglected"), and the poor state of many houses ("old" and "damp") which would require substantial cost to improve. It was argued that the costs to upgrade and maintain these houses to a

national heritage standard would be excessive and disproportionate to their heritage appeal, and that council or government heritage funding could be put to better use elsewhere.

One respondent claimed the situation is unjust if all other ex-State houses are not also classified as heritage, and so subject to similar development restrictions. They object to being burdened with a house (in need of renovation) that they cannot develop without significant financial input.

HA Forbes Street

2 comments

Two respondents opposed the inclusion of Forbes Street as an RHA. One stated that due to its proximity to Colombo Street and the public transport options here, it is ideal for development, while the other described the already mixed housing there and highlighted that the nearby Countdown supermarket detracts significantly from any heritage value of the area. Both raised the issue that renovations are required in this area due to the rundown nature of some of the heritage homes.

I don't believe that Forbes Street meets the criteria for Residential Heritage status whereas Shelley St would be one of the last remaining pockets of Sydenham workers' cottages all of which have been restored and well maintained.

Again, the "life expectancy" of older homes was raised in support of the argument that these homes should be able to be renovated or developed with as few restrictions as possible.

H Wigram

1 comment

One respondent objected emphatically to the Wigram Residential Heritage Area on the basis that the properties therein lack any special characteristics.

HA Chester St East ~ and Dawson street

1 comment

One respondent argued that even less of Chester Street East should be within the proposed RHA area than is currently proposed, stating that restricting high density housing from happening in Chester Street East is short sighted and largely only benefits those who currently own properties in the immediate area. This respondent made the point that many homes that are deemed 'character' homes are no longer fit for purpose as they are damp, mouldy, and of "pretty poor" quality. This respondent went on to say that a better use of the land these houses sit on would be to build 2-3 story high density town houses that would address the housing/rental crisis by providing more people with healthy homes and would have a long term positive impact on the environment.

HA Lyttelton (Lyttelton)

1 comment

One respondent raised objections to the proposed rules for Lyttelton, arguing that the rules would only constrain the evolution of Lyttelton's character – described as "eclectic" and lock it into a "historical" image of the past" that does not accurately represent the Lyttelton that has evolved over time. This respondent recommended that heritage zoning should be limited to the sites directly connected or adjacent to heritage buildings and sites, and closed their argument with the following: "More rules for everyone is ridiculous, beauty also hatches from randomness, and Lyttelton is very much that."

HA MacMillan Avenue (Cashmere)

1 comment

One respondent whose property is on McMillan Ave felt that their property should not be part of the heritage area. Their property is split over two titles; one title (with no buildings) falls outside the proposed heritage area, and the other (with buildings) falls within it. This respondent noted that the buildings on their section were damaged in the 2011 earthquakes and underwent extensive cosmetic changes during the repair process, therefore any heritage character that the house might have had is no longer evident. The respondent also argues that because the buildings are set well back from the road and there is no view of the buildings from the street, any changes to them will not affect the look and feel of the neighbourhood.

Rolleston, Worchester, Montreal, Armagh

1 comment

The University of Canterbury suggested altering the proposal to make it more "pragmatic", arguing that houses need to continue to service the needs of current and future residents rather than be treated as "fossils", and noting that the proposal restricts even minor changes such as improving ventilation or installing solar panels.

IDENTIFIED CHARACTER LOCATIONS

3 COMMENTS

CA Innes, Mersey and Severn to Westminster St (Malvern and Severn)

1 comment

One respondent stated.

In relation to the proposed Malvern Character/Heritage Zone I believe both sides of Roosevelt Ave are not included (as they in the current Character area). It seems silly to now include part of Rutland Street when town houses are already being built on that street (but none on Roosevelt).

This respondent also noted that they would like to see the site coverage increased to 50%, rather than the proposed 35%.

CA Hackthorne Rd (Cashmere)

2 comments

A couple of comments expressed their desire for the Cashmere Character Area to be removed or reduced. One of these offered this opinion in general terms, suggesting that the community saw little value in the designation and did not consider that limitations on development were necessary. The other requested their (currently vacant) property on Hackthorne Road be removed from the character area as they felt it was suitable for three dwellings to be built without negatively impacting neighbours, noting that surrounding properties were not included in the character area or had buildings which did not demonstrate character attributes.

Another respondent, who is a resident of the Cashmere character area, noted that they and their neighbours see little value in this. They argue that there is already a diverse range of housing in the area which itself adds character, stating that when talking to neighbours, there was no real sense that limiting further development is required. Finally, the respondent noted that they would support the removal or further reduction of the Cashmere CA.

IDENTIFIED HERITAGE SITES

6 COMMENTS

Daresbury House

1 comment

Daresbury Limited discussed Daresbury House, once a significant heritage homestead, and the damage that it had suffered during the earthquakes. They stated.

The extensive repair work that would be required to make the building structurally sound effectively requires destruction of the remaining heritage fabric of the building. The building is dangerous, well below Building Code standards, and is not inhabitable.

They went on to make this comment.

4.5 Daresbury Limited is opposed to the Council's proposed amendments to Heritage policies. Particularly, the proposed amendments to Policy 9.3.2.2.3 inappropriately shift the focus of the plan away from providing for ongoing use and adaptive re-use of heritage items, towards more rigid preservation and protection. This can have the perverse outcome of preventing the retention of heritage buildings by preventing owners (particularly private owners) from using and maintaining heritage items in ways that are practical and financially feasible. The risk of a rigid and inflexible focus on prevention is retention of heritage in a way that locks up the viable use of buildings and land, and can result in buildings being left vacant and poorly maintained.

4.6 Daresbury Limited is opposed to the proposed deletion of rules, matters of discretion, and other standards which apply to buildings that were damaged as a result of the Canterbury earthquakes of 2010 and 2011 (for example, rule P9, and matter of discretion 9.3.6.1(a)).

Kirkwood Avenue

1 comment

The respondent provided the comment below and included a list of deficiencies with the building.

The dwelling has suffered earthquake damage and has also been subject to years of deferred maintenance by a previous owner. As a result of this it has been exposed to the elements and water damage has led to a significant biohazard (mould) problem. As such it is now in extremely poor and dilapidated condition.

They requested (as the owner) that the building be removed from the heritage schedule as part of PC 13.

Hereford Street

1 comment

The respondent detailed the issues with the building at 300 Hereford Street. The building is a listed 'significant' building in the district plan. Engineers reports were provided detailing the issues with the building caused by earthquakes. They stated.

Overall, it is considered that the building would no longer meet the threshold for scheduling under policy 9.3.2.2.1. Accordingly, Hotel on Hereford requests that the building be removed from the heritage schedule as part of PC 13.

Peterborough centre and Victoria Mansions

1 comment

A property owner provided feedback on listed Victoria Mansions site and adjacent vacant land at 87-91 Victoria Street, They also own the heritage-listed Peterborough Centre (25 Peterborough Street) on the corner of Montreal Street. Both listed buildings suffered significant damage in the Canterbury earthquake sequence and both buildings have remained unoccupied since. They went on to make this comment.

Ceres recognise that both Victoria Mansions and the Peterborough Centre are listed buildings and that both buildings have heritage significance. Ceres has spent a number of years first resolving insurance claims and secondly investigating the engineering works necessary to restore both buildings. Due to the high cost of such works, Ceres is also in the process of investigating complementary commercial development on the balance of both sites with a view to the new development helping to cross-subsidise the restoration costs.

Ceres is concerned with the Council's proposed amendments to Heritage policies. Particularly, the proposed amendments to Policy 9.3.2.2.3 inappropriately shift the focus of the plan away from providing for ongoing use and adaptive re-use of heritage items, towards more rigid preservation and protection. This can have the perverse outcome of preventing the retention of heritage buildings by preventing owners (particularly private owners) from using and maintaining heritage items in ways that are practical and financially feasible. The risk of a rigid and inflexible focus on prevention is retention of heritage in a way that locks up the viable use of buildings and land, and can result in buildings being left vacant and poorly maintained.

Ceres is likewise concerned with the proposed deletion of various rules, matters of discretion, and other standards which apply to buildings that were damaged as a result of the Canterbury earthquakes of 2010 and 2011 (for example, rule P9, and matter of discretion 9.3.6.1(a)). There remain a number of large heritage buildings in Christchurch which are still in a state of disrepair and are significantly damaged as a result of the Canterbury earthquakes. It is premature to remove these rules and standards, which sensibly provide specific guidance for heritage buildings that have been earthquake-damaged.

Rannerdale House (aka Stevenholme House, Kauri House)

1 comment

The owner requested the Rannerdale House boundary be revised, and exclusions be applied to their heritage setting, and they support where exclusions have been made, for similar reasons to their own, for Suva Street. The rationale they offered follows:

We consider that the modern parts of the site do not contribute to the heritage value of Stevenholme House, nor accord with the District Plan definition of a heritage setting, as they are not integral to its function, meaning or relationships. For these reasons, they should be removed from the heritage setting extent.

While they support heritage values generally, they note that the portions of their property they wish to be excluded from heritage classification are not street facing and have already had some grassed areas removed.

The Blue Cottage

1 comment

An owner requested that The Blue Cottage (located at 32 Armagh Street) be removed "from the Schedule of Significant Historic Heritage in Appendix 9.3.7.2 of the District Plan", further, they would like to see the associated Heritage Setting 287 "removed from the same". The basis of their argument was that the building itself, its immediate and the broader surrounds have little heritage value. They describe the site as follows:

The building is in a poor state of repair with evident damage to its exterior and, as noted in the statement of significance, has had original architectural features removed over time. The heritage setting for the building is of no apparent significance in its own right - constituting a gravelled car park.

They conclude that the “basis does not exist for the introduction of the residential heritage areas” and caution that:

Given the restrictions on development that PC13 will impose, it is essential for Council to ensure that it has a robust and defensible evidential basis for what it is proposing.

RECOMMENDED HERITAGE LOCATIONS

9 COMMENTS

Riccarton

5 comments

These comments broadly questioned the heritage value of Riccarton and advocated for fewer restrictions for development in this area. Two respondents stated they already have consent to develop, and that owing to this, the RHA should not apply.

Specific areas which were deemed to have little or no heritage value included those at Piko Crescent (both generally, and number 2), Peverel Street (both generally and number 112), Shand Crescent (both generally, and its surrounds).

One respondent argued that, due to the proximity to amenities, the areas adjacent to Riccarton Road (including Shands Crescent) “should be designated a high density area rather [than] special character area”. They added that the Housing NZ properties offer a “poor vista”, and that the area is presently “dismal”, with poorly maintained buildings and grounds. They concluded their argument with the following:

Please remove the character designation as it affects our developments in this area.

Merivale ~ Leinster Rd

1 comment

A detailed response from the owner was offered in which they highlighted the Special Purpose Hospital Zone that applies to the St. Georges Hospital, and in which they support the removal of the character area overly for the Heaton Street frontage properties numbering 130 – 170 (on which no buildings stand due to all dwellings having been removed).

The respondent also seeks confirmation that it is the intention “to remove St. Georges Hospital from the Restricted Discretionary Activity Category RD7, which references the character area assessment matters 13.5.5.6.”. They went on to provide a list of specific points for clarification in relation to whether “development recognises the landscape setting and development patterns”, and call for the lower building height restrictions to be removed.

Sumner

1 comment

One respondent would like to ensure that a tree on their property is not a qualifying matter, calling for assurance that the tree will not be subject to a protection designation. They question the validity of protecting a large exotic palm, the fronds of which are described as large, spiky, and regularly falling, having rendered the respondent unconscious on one occasion.

The respondent claimed the tree is a health and safety issue and would like to see it removed and certainly not protected.

Wigram

1 comment

One respondent expressed opposition to the Wigram heritage areas as they do not believe these properties have anything that makes them special. This respondent did note that, overall, they think Council has done a good job classifying the many areas around the city.

Hornby, Hei Hei

1 comment

One respondent argued that Skerten Ave and Denise Crescent should be High Density Zones, as this area is surrounded such zones as well as industrial zones, and is very close to the mall. They expressed concern that the area would look isolated if not high-density.

FEWER QUALIFYING MATTERS SUGGESTED

5 COMMENTS

One respondent expressed support for the proposed changes to the extent of the Beckenham Loop Character Area and the proposed rules for development within this Character Area. The respondent went on to suggest that some of the proposed requirements (e.g. minimum frontage width, minimum building footprint and minimum building setback) be further investigated with modelling, arguing that reducing these requirements by a small amount may open up more

opportunities for development whilst remaining more in keeping with the scale and form of existing dwellings in the area.

Another respondent argued that heritage protection often extends to “scruffy” old houses, arguing that in these cases, protection serves nothing except to infringe on private property rights. A third respondent called for resource consent to be relaxed as much as practicable for ease of development, while another urged council not to give in to “NIMBY demands”, arguing “less requirements the better”.

A building company offered two main points in their feedback, both concerning reducing the impact that qualifying matters can have on their ability to develop their property.

The qualifying matters they want not to be subject to are tree overlay, and the State Highway Adjoining Sites (SHAS) qualifying matter. They state that the tree setback qualifying matter overlay “is an unnecessary duplication of control and should be removed”, and that:

... the State Highway Adjoining Sites qualifying matter overlay should be removed from their 40 Main South Road property.

OVERCOME INFRASTRUCTURE ISSUES

19 COMMENTS

The moderate number of comments addressing infrastructure were mostly in support of improving infrastructure or otherwise allowing intensification in the Shirley and Aranui areas. Others were about the power line setback requirement.

There were six comments containing the same text which expressed concern that the 5m setback from 400w power lines will “kill my property”. An additional three comments with the same text made similar points. Both sets of comments include a request that Council consider undergrounding the lines as an alternative. Two additional comments questioned the legitimacy of the 5m setback rule, stating that if it were required it would be applied nationally. An additional two respondents did not want the power line qualifying matter to diminish the development potential on land they have an interest in.

According to the new rules, the 5m setback will be very restrictive, and our 4 unit development will become a three-unit one, if not worse. So suddenly, the value of this property is going down significantly!

Another respondent speaking on the same topic noted that the setback will adversely affect many thousands of home owners. One respondent claimed that increased power capacity would be required in the event of mass uptake of EVs. Remaining comments addressed the Council’s justification for not allowing intensification in the Shirley and Aranui areas for reasons of limited capacity of waste water infrastructure. There was objection to this on two grounds: that the sewers inability to handle increased housing density is unjust (due to the issue impacting only certain residents), or that the issue could (and should) be ameliorated by an infrastructure upgrade.

I do not want to miss out on future investment opportunities because the council doesn't want to spend money on improving sewer capacity/infrastructure.

One respondent offered a lengthy and detailed response describing their long-held plans develop the property (where they have lived for many years); they feel aggrieved that this option appears no longer open to them and feel that those living in Christchurch’s East have been subject to multiple hardships post-earthquakes, and that this is one more blow. They would like to have seen earlier notification (so that the property could have been sold), or a better sewage system. They suggest a temporary halt to developer development, to allow smaller scale players the chance to intensify. Others conveyed similar sentiment, one lamented that they are “missing out on the opportunity” to subdivide.

Another respondent characterised the eastern suburbs as an “important expansion of the city eastward” and noted that such expansion could “help improve amenities and services”.

Lastly, one respondent summed up the views of many, by stating the following:

I do not support the inclusion of wastewater or other 3 waters infrastructure constraints as a Qualifying Matter for intensified development, such as the Shirley, Aranui and Prestons vacuum sewer areas. This is because, unlike other Qualifying Matters proposed such as heritage values that do not change over time, infrastructure

constraints can be surmounted and no longer exist. I propose that the District-wide engineering provision (which is already proposed) to assess infrastructure constraints is sufficient to restrict development where required.

SUBURBAN DEVELOPMENT

4 COMMENTS

One respondent offered suggestions as to how areas with little long-term future (due to sea level rise) or very weak ground (such as part of what is now the residential red zone) might be developed for housing in a way that allows them to be economically moved on when habitation becomes untenable and/or minimises their vulnerability to geohazards.

These suggestions included making low-lying areas leasehold from the Council, with leases expiring when the flood risk becomes too great, or building homes that can be moved once the land is no longer fit for housing. The respondent suggested that roads, driveways and infrastructure would need to be built differently, but that areas built up in this way would be more resilient against earthquake damage and would cost little to clear entirely should it become too flood prone.

Another respondent discussed the NPS-UD's requirement to assess the impact of these qualifying matters on the housing capacity, especially when located within a walkable catchment, and noted that some of the qualifying matters proposed by CCC are located within a walkable catchment. This respondent suggests that housing capacity loss should be assessed, and that further height should be allowed elsewhere to balance the impact on intensification.

A third comment argued that some areas such as Riccarton and Merivale should not be exempt given that they are so close to the CBD, public transport, cycleways, and the university.

Finally, a fourth comment argued that for the residential catchment surrounding Cranford Park, a 12m height limit provided for by the LCZ (small) classification of Cranford is considered inappropriate and inadequate. This feedback also suggested that there is no need to distinguish between small, medium, and large LCZ, instead arguing that a 20m height limit across all LCZ is appropriate in order to enable intensification of these centres.

AIRPORT NOISE CONTOURS

4 COMMENTS

Four respondents expressed concern about the noise contour as a qualifying matter, each making several points but each considering it a deterrent to intensification.

One respondent claimed that the CIAL-led initial data is exaggerated and that "the outer control boundary restricting residential development is a major impediment to residential growth". Another claimed that the CCC is "using the Qualifying Matters exclusion clause to effectively show disdain to the goals of the NPS-UD". This sentiment was echoed by an additional respondent who queried whether or not the qualifying matters defy NPS-UD goals.

Two respondents agreed that certain areas should be excluded from the Airport Noise Contour qualifying matter, the following quote also raises other areas:

Many sites which fall within the overlay would be suitable for intensification as these are near local centres (i.e. Avonhead Mall, Waimairi shops) along with the University. There are also a large number of open spaces and parks within the overlay (Burnside Park, Rayblank Park) which would help to offset the surrounding intensification.

Areas in close proximity to the university were considered to suitably complement the cycle infrastructure upgrades that Council has already invested in. Broadly speaking, respondents did not want to see the airport stand in the way of intensification goals.

GENERAL DECREASE QUALIFYING MATTERS COMMENTS

8 COMMENTS

In several comments, respondents wanted qualifying matters not to be stringently applied so that more development be facilitated. A few of the respondents opposed the need for resource consents for residential areas, stating that this will only deter intensification. One respondent simply noted "we need homes, lots of homes".

Two respondents wanted to see specific qualifying matters decreased, tree cover and minimum allotment size in a rockfall area rockfall areas. This was to increase the potential for development and to reduce the associated costs. The objection to the minimum allotment size of 650m² on rockfall sites was on the basis that presently unused land could be developed and become a productive rates source for council. The objection to the tree qualifying matter was broadly on the basis that trees can be a burden for future residents and that they may even be let to decline due to the cost and other burdens associated with caring for them.

Another respondent called for the Council to adhere more to the government's directives (i.e., present fewer opportunities to challenge them such as with qualifying matters); this was so that the desired positive impacts of intensification could be more easily achieved.

Lastly, one person stated that there are "too many different qualifying matters"; in particular noise effects were considered able to be mitigated with better insulation. This respondent considered heritage, climate change and natural hazard-related qualifying matters reasonable.

Section 6: Financial contributions 113

comments

Section summary

- > Around three quarters of respondents who commented on this section either supported the financial contributions approach or considered it too lenient.
- > Over half of the around 50 respondents who **supported financial contribution** made a short supportive statement via a Generation Zero form. The remaining respondents who supported the approach felt that protecting the tree canopy was important and this was a way to achieve this outcome.
- > Those who felt that the **financial contributions were too lenient** (around one quarter of respondents, or 25) felt that the approach allowed developers to pay some money to avoid having to protect trees which they felt should not occur and instead existing trees should be protected, in particular. Other reasons for objecting were that a young tree is not an adequate compensation for a mature tree, tree plantings should be close to where the development occurs, and Christchurch is a flat city and trees are important for sun protection. Some respondents felt that it is important for trees to be planted where the development occurs.
- > Those who felt the financial contributions were too strict predominantly had first-hand development experience, and explained a number of issues in relatively detailed comments. The arguments posed were that the scheme would be too difficult to calculate accurately and administer which was summarised as 'red tape'; it would be too costly and costs would be passed on to purchasers.
- > Various other financial contribution possibilities or issues were also identified by respondents. Most of these were clarifications or suggestions of how they would work in reality, such as where trees would be planted and placing higher value on mature trees.

Note that the Plan proposes financial contributions be made if certain conditions are not met when developing land:
"We're proposing that if anyone wanting to develop land does not retain or plant 20 per cent tree canopy cover on a site they will be charged a Financial Contribution. These will be used by us to plant trees on Council-owned land"

Support financial contributions 54 comments

A substantial number of respondents supported financial contributions.

Over two thirds of these responses (39) provided the following statement in their support for financial contributions, which originated from a Generation Zero form.

I support incentives for more trees to be planted in new developments and the council creating more green spaces around the city.

The points made in other more detailed comments were that the retention of a significant percentage (20%) of tree coverage is important and development is likely to have a negative impact on this. Respondents considered it important for tree canopy to be replaced and on this point, the financial contributions approach was considered suitable. Specific points made were that the tree planting should be in close proximity to where the development occurs and that native rather than exotic species should be planted. One respondent stated that a potential benefit is a reduction in the heat island effect of hard surfaces.

The Board acknowledges that areas of more intensive housing will attract greater development and financial contributions and these contributions should be utilised in the areas they are generated from to provide infrastructure, tree canopy and greenspace upgrades and provision.

The following is a relatively short statement which reflected the sentiment of a high proportion of these respondents.

Trees should be included, so I support the proposals. Tree planting on residential streets and public spaces should be made a standard requirement of new developments.

A number of respondents also wanted significant trees to be retained.

I am very concerned about the loss of trees that will occur under these new rules. Already whole neighbourhoods are being devastated in terms of canopy cover. Halswell is one that comes to mind. Native birds need connectivity between vegetated areas and these new rules will see a colossal reduction in trees in the city. I support financial contributions from developers going towards tree planting on council land, but think it needs to be a significant contribution so as to completely offset the loss. This loss could be projected (on a large scale not individual properties) and the financial contribution worked out from that. I also believe this is not a step far enough. In addition all native trees larger than 10m should not be able to be removed. These trees offer significant ecosystem services that need to be maintained.

Oppose financial contributions (too lenient) 25 **comments**

A considerable number of respondents opposed the financial contributions proposal because they believed that this was a way for developers to buy their way out of protecting the environment.

The following comments articulate the general point being made.

You should not be able to reduce open space and tree cover in housing areas by paying money to plant elsewhere - this is like selling carbon credits overseas - the trees must be in the area of the development even if this reduces density of development.

Developers no doubt will be pleased not to have to worry about landscaping and beautifying when a one-off financial contribution eliminates the need to consider planting trees. The council benefits financially, the residents lose out aesthetically.

Some respondents were particularly concerned with the loss of established trees and the replacement with saplings, this was one of the comments that made this point.

I am concerned for the loss of trees, trees that have been getting established for decades. Replacing established trees with saplings will set our environment back many years at a time when we're supposed to be reducing our carbon footprint urgently. What guarantee is there that fees taken for the felling of trees will be spent on new trees. Where will they be planted?

This respondent's detailed comment covered a number of points and expressed the view that green environments need to be close to where people live so that they can be experienced from people's homes.

I also submit that requesting a financial contribution where trees or green spaces are less than a certain percentage of the property is a very weak incentive to build nature into these developments. Judging by our experience in Spreydon, the likelihood is that this contribution will be paid by developers and the cost passed on in the price of the housing. This will transfer (a reduced number of) trees from individual properties to parks. The risk is high that we will end up with a residential area paved in concrete and bereft of trees except for the occasional park that people need to walk some distance to. People - especially children - need to live in nature for their wellbeing, not just travel to it on occasion. This is a huge issue for Christchurch given our flat plain topography where, unlike the other large cities, we do not have the relief of hills and valleys that are green because they can't be built on. At the least, I encourage Council to put in place a requirement much stronger than a financial contribution to encourage proper landscaping in these developments. I also request Council to put a great deal of investment into green streetscaping. It's wonderful to protect the listed trees but these are likely to be in wealthy areas. We are in real danger of exacerbating climate injustice and inequality in this city and Spreydon/Barrington is showing exactly how this can happen.

The following respondent linked the issue to the climate crises and the need to take appropriate actions.

Climate Change: We feel Climate Change has not been factored into these proposed changes. Christchurch only has an average of 15% tree canopy coverage according to CCC data. With High density residential intensification this will reduce further. There is no requirement for Developers to retain or plant trees. Planting a tree on council land is not going to help with the immediate effects of climate change, as trees take decades to mature. We need

to protect our mature trees. This will also have a harmful impact on our native bird population. We are currently the Garden City, we fear with this proposal, this status may change.

Oppose financial contributions (too strict) comments

14

Several respondents opposed the proposal for financial contributions because they felt the proposed approach was too strict. These comments were some of the most detailed and lengthy on a particular issue throughout the whole engagement and a wide range and variety of arguments were made.

The main points were that it will add additional cost to developments that will be passed on to purchasers. There was also significant discussion on the complexity and “red tape” involved in administering the system, for example how the tree canopy percentages will be calculated ahead of time, and some felt that this creates uncertainty which will result in delays and additional costs. Others felt that the approach was unnecessary and an example of council overreach.

This commenter questioned whether there would be exceptions, in particular circumstances.

If the financial contribution is retained where subdivisions do not achieve the current District Plan minimum 15 hh/ha standard, ensure that exemptions apply where there are physical or natural constraints to achieving this standard, e.g. geotech ground conditions, naturally occurring springs, other natural features to be protected. Such constraints are already recognised in the Outline Development Plans, and this recognition should be retained in the financial contributions rule.

The following respondent felt that forcing a 20% canopy in some circumstances would lead to negative outcomes, such as loss of natural light, and leaf drop on adjoining properties that could lead to disputes and the slowing down of developments.

3) The 20% tree canopy rule is not practical for host of reasons, as listed below. It will result in:

- The loss of natural light - The loss of sun - Canterbury homes need the sun, especially in winter, as part of keeping the occupants of these homes warm & healthy. - Neighbour issues including with trees creating shading plus leaf drop leading to disputes between adjoining properties. - Increasing the cost to build with added levies paid by the developer that will be passed on to the buyers. This is counter productive to what Government are trying to achieve. - Huge potential to slow down development that the Housing Enabling Bill is trying to increase. - When developing at 15 hh/ha & trying to make these home liveable warm & dry the tree canopy requirement will make this very challenging & compromises will be made that will compromise the functionality of these homes. - Increasing berms also increases rate payers maintenance at leaf clean up time, damage to footpaths, drain blockages etc.

This respondent outlined the cost of the proposal for developments.

The financial contribution will be a cost per tree for planting etc (appx \$2,000) + the land cost per tree canopy cover area; or a proportion (unspecified) thereof. The average tree canopy area is stated as 113m². For a 500m² site with a market value of \$450,000 (\$900/sq m) this equates to 100m² of tree canopy, or a financial contribution of appx. \$90,000 (land cost equivalent). For greenfield sites, this equates to, in addition, one tree per site frontage (assuming 20mx25m site), which exceeds the current provision for street trees, which are voluntary but usually provided by developers as an amenity feature and in most cases are spaced at around one per two site frontages.

Another respondent sought greater detail of what is planned:

The information put forward by Council for the community on the tree canopy cover is adhoc and incomplete given the financial extent to which proposed changes are to be met by the entire community. It is also extremely far-reaching and has been tacked onto the MDRS District Plan change inappropriately. Such a new ‘District Wide matter’ if necessary to apply to the whole city and not just in residential MDRS provisions needs to be properly addressed by a specific plan change through the normal RMA processes.

Lastly, the following respondent felt the approach was complex and there was a risk of the Council “double dipping”.

The introduction of Financial Contributions for 'tree canopy cover' will add another layer of complexity to the development process and is considered to 'double up' on the charges already being levied by Council as part of Development Contributions.

Various financial contribution points comments

20

A moderate number of respondents discussed other aspects of the tree-related financial contributions. A variety of relatively detailed points were made primarily getting into the detail of how this approach would work and identifying issues that may need to be clarified. The detail of these responses is best understood if read in full. Below is a selection of the arguments made.

One respondent felt there were risks of trees impacting footpaths and damaging existing infrastructure such as pipes.

I'd like to see some of the revenue from new development earmarked for public amenity - green and streetscaping. More public space trees, especially on our overly wide suburban roadways.

This respondent sought clarification on how the contributions would work if only three units are built.

If only the 3 units are built, this will require a total outdoor living area of 60 m², at 20 m² per unit. This is just over 7% of the site. How will the tree canopy requirement be enforced when a 3-unit development does not require a resource consent?

This respondent described their preference financial contributions be spent in ways that benefit the environment.

Densification is better for the environment than sprawl, as green belts and other large public spaces with trees, plants and wetlands are much more effective in providing benefits of carbon sequestration and climate control than standalone plantings in lots and on the road. Therefore we want those financial contributions being used to create more green belts within the city.

Similarly, this respondent called for a fees structure that compensates for the social or environmental impacts their developments have.

Let's charge substantial fees to people who develop the tall buildings or the more intensive buildings, eradicate the existing tree canopy, and rob their neighbours of the sun that heats their homes (and adds to the demand for grid supplied energy throughout the year). Let's set financial contributions at a rate that avoid, remedy, or mitigate any adverse effects of activities on the environment, now and into the future.

This respondent emphasised the importance of retaining mature trees over young trees.

The idea of a financial contribution for those landowners who take down EXISTING trees on their land so that trees can be planted on council owned land is sorely misguided. Mature trees take years to grow and make the character of a neighborhood. Council owned land is not everywhere, so young trees will be planted in parks, while we lose the older trees that make streets shady, give character to neighbourhoods, alleviate climate change and provide havens for birds.

Lyttelton Port Company provided a significant amount of comment on this topic and sought clarification of its circumstance, and **Waka Kotahi** made a link to the approach and positive transport outcomes.

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