

Christchurch Central Recovery Plan

A Liveable City: Analysis of Comments

September 2014



Table of Contents

Overview	4
About the Report	4
Summary of findings	4
Proposed District Plan Changes	7
Car Parking	7
Comments in <i>support of car parking</i> changes 37 comments	7
Comments that <i>did not support car parking</i> changes 70 comments	8
General comments regarding car parking changes 12 comments	9
Maximum Building Heights	11
Comments in <i>support of maximum building height</i> changes 21 comments	11
Comments that <i>did not support building heights</i> changes 138 comments	12
General comments regarding building heights changes 9 comments	14
Comments regarding specific building heights changes 7 comments	14
Urban Design Assessment	16
Comments in <i>support of urban design assessment</i> changes 8 comments	16
Comments that <i>did not support urban design assessment</i> changes 237 comments	16
General comments about Urban Design Assessment 3 comments	20
Specific Changes 5 comments	21
Special Amenity Areas	22
Comments in <i>support of special amenity area</i> changes 9 comments	22
Comments that <i>did not support special amenity area</i> changes 78 comments	22
General comments regarding changes in Special Amenity Areas 12 comments	25
Specific comments regarding changes in Special Amenity Areas 3 comments	25
Non-Residential Activity	26
Comments in <i>support of Non-Residential Activity</i> changes 41 comments	26
Comments that <i>did not support non-residential activity</i> changes 25 comments	27
General comments regarding changes in non-residential activity 8 comments	28
Specific comments regarding changes in non-residential activity 3 comments	28
Recession Planes and Setbacks	29
Comments in <i>support of recession planes and setbacks</i> changes 16 comments	29
Comments that <i>did not support recession planes and setbacks</i> 93 comments	30
General comments regarding changes in recession planes and setbacks 2 comments	33
Specific comments regarding changes in recession planes and setbacks 9 comments	33
Outdoor Living Space	34
Comments in <i>support of outdoor living space</i> changes 27 comments	34
Comments that <i>did not support outdoor living space</i> changes 51 comments	34
General comments regarding changes in outdoor living space 5 comments	36

Specific comments regarding changes in outdoor living spaces	2 comments	36
Residential Site Density		37
Comments in <i>support of residential site density</i> changes	28 comments	37
Comments that <i>did not support residential site density</i> changes	53 comments	38
General comments regarding changes in residential site density	7 comments	39
Travellers' Accommodation		41
Comments in <i>support of travellers' accommodation</i> changes	21 comments	41
Comments that <i>did not support travellers' accommodation</i> changes	20 comments	41
General comments regarding changes in travellers' accommodation	12 comments	42
Specific comments regarding changes in travellers' accommodation	5 comments	42
Notification of Resource Consent Applications		43
Comments in <i>support of notification of resource consent applications</i> changes	9 comments	43
Comments that <i>did not support notification of resource consent applications</i> changes	158 comments	44
General comments regarding changes in notification of resource consent applications	4 comments	47
Specific comments regarding to changes in notification of resource consent applications	15 comments	48
Other Specific Standards		49
Development Standards 2.2-2.4 (parking and loading)	9 comments	49
Critical Standards 4a.3	7 comments	49
Development Standards 4a.2	26 comments	49
Built Form/Amenity and the Role of CCLZ	12 comments	50
Activity Standards 4a.1	2 comments	50
Living 5 rules	2 comments	50
Other and overview comments from commenters		51

ABOUT THE REPORT

CERA developed A Liveable City, to add to the Christchurch Central Recovery Plan. The draft chapter proposes some changes to the Christchurch City Plan (the District Plan).

This report is a summary and synthesis of all comments received on the draft Chapter.

The Recovery Plan already recognises that inner city living helps to create a vibrant inner city that is functioning well. It also anticipated more detailed information would be added after Christchurch City Council had reviewed the central city Living Zones in the District Plan. The draft residential chapter puts forward a vision and objectives for central city living, along with several initiatives to stimulate the development of housing and communities, and in this way help central Christchurch to recover and thrive.

The draft chapter was consulted on from 16 July to 13 August 2014. In total 184 comments were received from individual commenters or organisations. 127 were from the online survey provided to the public and 57 were written comments provided in commenters' own format. The number of comments is high compared with other similar plans which have been consulted on by CERA over the last 24 months.

Each comment has been categorised under the appropriate theme within the chapter and within each theme into an appropriate topic. The table of contents provides the list of *themes* covered in the report. Each theme (section) of the report begins with a summary of comments made relevant to that theme.

The report begins with a summary of findings which presents a discussion of the most commonly commented on themes and topics, and identifies issues which span a number of themes.

Number of comments key

The key below is used to consistently indicate the number of comments made on each topic within the discussions throughout the report.

"One" = one comment

"A couple" = two comments

"A few" = three comments

"Several" = 4 - 6 comments

"Many" = 7 – 10 comments

"A large number" = 11 - 15 comments

"A significant number" = 16+ comments

SUMMARY OF FINDINGS

This is a summary of the views raised by commenters on the draft A Liveable City Chapter.

- The majority of comments made were either opposed to the proposed provisions or sought changes.
 - The provisions that were opposed most by respondents were: *urban design standard assessment* (237 comments); *notification of resource consents* (158); *maximum building heights* (138); *recession planes and setbacks* (93); *special amenity areas* (78).
 - The provisions that received the most supporting comments were: *non-residential activity* (41); *residential site density* (28); *outdoor living* (27)
- The three most commented on aspects of the plan were:
 - **Urban design assessment:** This was the most commented on aspect of the Liveable City Chapter. The vast majority of comments (97%) opposed the removal of the urban design standard. There was rejection of the argument that the market will demand and provide high quality residential housing. The overriding view was that unchecked the market will provide cheap options which maximise short term profits but result in poor quality, unattractive buildings and developments. The downstream impact of this would be an unattractive and unhealthy city that would fail to attract residents and deliver on the current opportunity to create a quality environment.

- **Maximum building heights:** this was the second most commented on aspect of the Chapter. Around 85% of comments suggested change to the proposed provision. A significant number of comments were in favour of retaining the existing rules to maintain greater building form diversity, be more sensitive to existing buildings and neighbourhoods (in particular heritage and SAMs) and lead to more sympathetic design outcomes such as less shading on neighbours. Neighbours felt particularly aggrieved by the potential of having a large building shading them from next door.
- **Notification of resource consent applications:** This was the third most commented on aspect of the Chapter, with around 95% of comments opposing the changes. A very large number of commenters rejected outright the removal of this right. Commenters wanted to be able to protect the amenity of their home and area from poor standard developments being built next door and in their neighbourhood by being able to comment on new developments that require resource consents. Some stated that the removal of this right would put their investment at risk and would deter others from investing because they could not be confident that their investment would not be undermined by other poor standard developments being constructed in the future.
- Some common themes consistently came through comments on various aspects of the Chapter:
 - **A desire for consultation** in the development of neighbourhoods and communities. This came through strongly in the comments regarding *notification of resource consents* where resident wanted to be able to comment on developments that would impact their neighbourhood. It also came through with regard to the impacts of *building heights* and *travellers accommodation* on surrounding areas.
 - **Rules are skewed too far in favour of developers** was a theme that came through in comments made in various aspects of the Chapter. This included *building height* rules; *site density*; *urban design assessment*; and *notification of resource consents*. Generally these comments stated that the rules would enable developers to benefit through profits but the design and amenity outcomes for the community would not be high quality. This is because the rules gave too much leniency to developers to be able to progress their proposals in a timely manner with not enough consideration of the outcomes for the local community of the subsequent developments.
 - **Market won't provide quality outcomes** was a theme which came through in a number of areas. 'The market will provide' was the rationale used to reduce the rules in a number of areas within the Chapter, but generally this was rejected by commenters. Two examples of this were: *urban design*, where it was felt that relying on the market to deliver quality designs will result in cheap ugly buildings that deliver short term profit but long-term negative impacts; *Parking* – where developers will provide the minimum required and tenants or purchasers will be forced to take what is provided. This is especially so for the current market conditions where there is a shortage of residential supply.
 - **Agreement with creating a quality vision** but disagreement with how the rules would achieve this vision. There was discussion in a number of areas how creating a quality vision for the city was important but the methods proposed to get there outlined in the Chapter were disagreed with. For example *SAMs* were seen as a way to preserve and protect quality environments, but the removal of them from the Chapter was considered a way to end up with bland neighbourhoods which undermine amenity and heritage values. Removal of *resource consent notification* was seen as a way of removing local checks on the quality of new developments. The removal of the *urban design panel* was considered the removal of a mechanism that would identify poor quality design and assist with improvements. The removal of *off-street parking* requirements was considered a way to increase parking congestion on streets.
 - **Long term consequences** were seen as something which should be seriously considered in relation to removal of *parking provisions*; *urban design panel*; *non-notified consents*; and *residential site density*. It was felt that the developments that would be the consequences of these provisions would be around for a long time and would take decades to remedy once they have been built.
 - **Elements cannot be considered in isolation** was a comment that came through in a number of areas. For example *parking provision* changes rely on the establishment of quality public transport if people are to be less reliant on personal motor vehicles. It was important that the changes to

building heights were assessed with consideration of shading. The *site density* provisions rely on *recession planes*, *set-backs* and *outdoor living space*, but there were questions over these elements being significant enough to create quality site density outcomes.

- **Retain existing provisions** was a common preferred option for many commenters in a number of areas this included: *building height* provisions and specifically the desire to have more sensitivity to heritage and SAMs and less shading; a significant number wanted the *Urban design panel* retained; *recession planes and setbacks* were preferred to be retained by some to preserve sunlight; the existing *outdoor space* and *residential site density* provisions were other areas that many wanted retained.

Support

- The areas that were most supported were:
 - **Non-residential activity** where around 60% of comments were in favour of providing for more restricted non-residential activities in residential areas. Many of these comments were general statements of support. The reasons for support included creating a more vibrant community through restricting the non-residential activity rules. Many were in support of non-residential activity which supported the local community and did not negatively impinge on neighbouring residents.
 - **Travellers accommodation**, where around 50% of comments were in favour of this proposal. Comments on the whole were general with limited discussion of reasoning.
 - **Outdoor living**, where around 35% of comments were in favour of the proposed changes to outdoor living space. The vast majority of these comments provided general support for the provisions without providing substantial comment to explain their support.

Proposed District Plan Changes

CAR PARKING

Existing provision: A minimum of one garageable parking space per unit is required.

Proposed provision: Remove the minimum requirement of one garageable parking space per unit.

Rationale: Prospective purchasers and tenants will direct the form and number of onsite car parks. In other words, the market will decide what the car parking arrangements will be.

Summary of comments:

Around 65% of comments discussed changes to the proposed provision. The most common argument was a rejection of the rationale by those who stated the provision of parking would be dominated by developers' wishes who would provide the minimum requirement in order to maximise their short term profit. The consequence of this would be an inability to easily correct in the future what is built now. They believe that current high demand for housing would force people to buy or rent, even though they would prefer something else. The consequence of this would be clogged on-street parking, creating difficulties for residents and visitors. Comments were made that public transport is currently not good enough to replace car use. The most popular alternative to what is proposed was continuation with the existing provision.

Around 35% of the comments on *car parking* were in favour of the proposed provision. The commenters that provided an argument explaining their approval most commonly stated that it was more important to have a maximum than a minimum car parking provision and that this would encourage and go hand in hand with less car use in the future. A number of these commenters were confident that the market would dictate and decide on what was an appropriate provision. Within this supporting group, there was a significant number who stated that this provision would only work if it was part of a broad approach which included quality public transport and support for alternative transport methods.

Comments in support of car parking changes

37 comments

General support

24 comments

Two points were commonly made in these comments.

A large number of comments were made regarding having a maximum car parking requirement as opposed to the minimum requirement that is proposed to be removed.

The other main point, made by several commenters agreed that the change was necessary so that people would use alternative means of transport other than cars, for example, public transport, cycling and walking. To compliment this, several commenters stated this issue can't be dealt with in isolation and needs quality public transport and support of alternatives to private vehicles for it to work such as pedestrian and cycle provision.

Improved public transport alongside the provision of good quality walking and cycling infrastructure in the Central City Living Zone makes it likely that some residential occupants will choose not to own a car.

Several comments were made agreeing with the change as they thought developers would still provide parks to meet demand.

A few commenters stated that the market would be appropriate to dictate how many garageable parks are available, hence the current provision should be removed. A few comments were made suggesting that there should be caution around providing parking spaces rather than garageable spaces.

This statement covers a number of the issues raised:

This will allow a number of alternative residential units typologies to be incorporated, in particular higher unit densities on the same land area. Ultimately the market will determine what is required. Some developers will no doubt still provide dedicated parking as part of their sales package and their personal perceptions regarding what potential occupants may demand. The ability for inner city residents to choose how much parking they require, and to lease it separately, makes the actual cost of parking far more transparent. It is expected that car parking facilities will be provided within the Central City Living zone by both the CCC and private providers to service these developments.

This change places more pressure on the City to provide a safe, efficient and affordable public transport system to service the residents. Rules will also need to be put in place to prevent the inner city streets being cluttered with resident's vehicles.

Other individual commenters who generally supported the proposed changes stated: adequate parking was available in the vicinity; against leaving the provision of garageable car parks to the market; against having car parking at the front of sites along the road; suggestion for one garageable park for high-density areas only; some people may require larger garages for second cars; developers wouldn't provide parking as it would take up valuable space; removing the minimum car parking provision would assist in maximising some sites to achieve higher density; cautious about pressure put on on-street parking.

Full support

13 comments

A large number of the comments in this section agreed with the changes proposed to the minimum car park requirements. A few comments were made explaining that the change would reduce dependencies on private transport and encourage more use of public transport. A few commenters suggested that letting the market decide how many car parks to be made available would be the best way. One commenter agreed with the changes as they were...

...essential for promoting medium-density living in the central city.

A single commenter suggested that visitor cycle parking minimums should be introduced and another stated minimum parking requirements were out-dated.

Comments that did not support car parking changes

70 comments

Disagree with rationale

18 comments

The main concern raised in this section was the belief that if there is no requirement for providing garageable parking spaces, then developers will not provide them. A large number of commenters made this point, with one stating it like this.

The market won't decide. Developers will try and build as little as they can get away with, and prospective purchasers and especially tenants will have limited choice.

A large number of comments were also made regarding the expectations of the market being able to decide what the parking arrangements will be. Commenters suggested that the market was driven by developers, rather than buyers and that relying on the market to provide adequate parking would be a huge gamble as parking wouldn't be able to be added after a building is designed and completed. It was stated that buyers would be forced to rent what is provided, even if they did prefer parking, because there is a shortage of housing. Several stated that developers are driven by short-term returns over providing what the market wants. Another comment added that the Council should be the one to decide parking arrangements as opposed to the market.

A few comments were made regarding a rise in undesirable on-street parking and the clogging of streets if the provisions were to change and no parks required to be provided. One of these comments made the point that there could be problems with visitor parking on streets. A couple of comments were made suggesting that the current public transport in Christchurch was not capable of handling the situation arising from having no required garageable parking.

Individual commenters made the points: due to shortage in housing, people would have less choice of housing, and may have to agree to live where there is no parking provided, leading to parking problems; the demand for car parking is different from the models currently used by traffic planners, and so planning for the parking provision cannot be based on these models which are more descriptive of places such as Hong Kong and cities in Europe with narrow streets and walkable areas, where lifestyles are set-up for non-car ownership.

Street congestion and parking problems

15 comments

The most commonly made point in this section was that the proposed change in garageable parking spaces would lead to street congestion problems due to a lack of on-street parking. Especially on narrow streets, cars would clog the roads causing "chaos".

A few comments were made specifically about visitors not being able to find a place to park, as the on-street parking would be taken up by residents. One commenter stated:

As an inner city resident we already have issues with visitors not being able to park on the street as residents and inner city workers have used all available parking.

Singular comments made were: a reduction in garageable parking spaces could lead to residents parking across footpaths, which would be a danger to pedestrians having to walk on the road; concern about the likelihood of break-ins and vandalising of cars that are parked on the street; housing without adequate parking spaces would lead to an undesirable and “unliveable” city.

Keep existing provision

14 comments

Many comments specifically or generally stated that the provision for garageable parking should remain as it currently is (a minimum of one garageable parking space per unit). A few commenters suggested that even if the space was not needed for a car, it could be used for storage of other things, for example, bicycles, scooters or motorcycles, or just storage in general. A few comments were made noting there was not enough on-street parking available if the change in provision was to occur.

Individual commenters made the points: public transport will be insufficient for many years to come, so Christchurch residents will still need their own cars; ability for residents to park cars near homes is currently very limited, so taking away the parking requirement would not be encouraged; general statement that it is nice to have space for a possible car; removing required parking space would cut down on clear space between buildings and complexes, leading to smaller apartments of lower quality.

Public transport and cycling are inadequate alternatives

9 comments

The most commonly made point was that the public transport system in Christchurch would need to be significantly strengthened in order for the changes in the parking provision to be successful. Commenters suggested that the public transport in Christchurch needed to be safe, consistent and of high quality, otherwise the proposed changes in the parking provision would be insufficient to meet residents’ needs.

Two commenters suggested that safe cycle ways should be provided.

Individual commenters made the points that: the climate and weather in Christchurch means that it is unrealistic to expect residents to cycle all year round; a change of expectations is needed before people switch from using their cars to another mode of transport; the networks required for convenient public transport do not exist in Christchurch as they are in other places, such as Hong Kong and Europe.

Other suggestions

14 comments

Many different suggestions were made regarding the parking provisions changes. Several comments were made specifically about how many parks there should be per residence: number of car parks be based on the number of bedrooms in the residence; two parks per dwelling plus two off-street visitor spaces; 60% garages, 20-30% car ports and covered space for bikes; two parks per unit; 0.5 parks per residence.

Individual commenters made the points: the provision should only be for the inner city areas, not extending beyond the four avenues; there should be no minimum car parks, but minimum visitor cycle parks instead; reference to San Francisco having parking on the ground floor of each complex; suggestion of shared spaces rather than individual garaging, as it would be a more efficient use of space.

General comments regarding car parking changes

12 comments

There was a broad range of general comments provided.

Individual commenters made the points that: on-street parking should be kept to a minimum so there could be more trees on the roadside; question regarding where the cars will go; warning not to assume future residents will be car-less or not require garage storage; in specific areas, such as Ely Street, Melrose Street and Otley Street, the existing character needs to be protected, which may not happen if more people have to park on the street; suggestion that this proposed change in provision needs to be combined with other ideas as it is too simplistic; suggestion to have enough parking buildings near to residents so they can lease a park; suggestion to allow projects to go through an urban design panel for decisions on where minimising car parking is appropriate; concern about car parking being

placed in front of sites along the road; incorporation of maximum parking standards into the District Plan; criticism of the surveys done by the transport planner groups for various council reports – not surveying any L4 or inner city residential areas, measuring cars on only limited occasions at limited sites, failing to recognise the importance of the use of cars by permanent residents of the inner city, failing to recognise the narrowness of many inner city streets; question regarding the safety of pedestrians with driver and pedestrian visibility being restricted by fences, and whether there will be a requirement for no reversing across footpaths; question regarding crime prevention measures that will be put in place if cars are on the streets.

MAXIMUM BUILDING HEIGHTS

Existing provision: There is a range of different limits for building heights: 8, 11, 14, 20 and 30 metres. It is also possible to make a building an additional 3.5 metres higher if it uses a pitched roof design. Although the different heights relate to historical differences in particular parts of the inner city residential area, many of the distinctions are less relevant today.

Proposed provision: Set a height limit of 14 metres throughout the Central City Living Zone. This allows for four-storey development and no additional allowance is made to encourage a particular roof style.

Rationale: The community desire for lower-rise development recognised in the Christchurch Central Recovery Plan includes the residential areas of the central city. The 14-metre height limit allows design to be flexible and to produce a variety of housing to suit the different needs of potential residents.

Summary of comments:

Around 85% of comments suggested change to the proposed provision. A significant number of comments were in favour of retaining the existing provision because this would create greater building form diversity, be more sensitive to existing buildings (in particular heritage and SAMs) and lead to more sympathetic design outcomes such as less shading on neighbours.

Neighbours felt particularly aggrieved by the potential of having a large building shading them from next door. For this reason many wanted to retain the right to comment on new building developments, particularly if they would be impacted. A number of commenters felt that the new rules were weighted too heavily in favour of developers.

Around 15% of comments supported the changed provision. About half of these stated general full support. The other half added conditional statements to their support including things such as ensuring there are no exceptions, neighbours are not shaded and the impact on surrounding buildings was taken into account. Some who supported the proposed provisions also wanted the protection of existing areas.

Comments in support of maximum building height changes

21 comments

Full support

11 comments

Several of these comments were general statements of support. A few comments explained that the changes would bring simplicity and cohesiveness to building height standards.

One comment was made stating that not having as many taller buildings would be good as many people no longer wished to work in tall buildings, and the sunlight would not be blocked. Another commenter agreed with the changes as the 14 metre height would...

...balance medium-high density while retaining a human scale.

General support

10 comments

Comments from many of those who generally supported the proposed changes in maximum building heights stated their support is conditional on particular conditions, including: there were no exemptions that could allow some developers to exceed the maximum height; not adversely affect neighbours' sunlight; neighbours have the ability to challenge projects based on the effect of their surrounds; the compatibility with the scale of other buildings in surrounding areas was taken into account; each property has at least two car parks on average per residence; the allowance for a pitched roof is removed; recession plane considerations were taken into account; it introduces a consistent and balanced height restriction across the central city living zone.

A few comments were made regarding Special Amenity Areas (SAMs) retaining different maximum heights, so as to preserve the existing character in these areas, particularly Chester Street East. Similarly, comments were also made about the character of the areas being retained, and how changing the maximum building heights may prohibit this. One commenter suggested that there should be two different maximum height zones, which would protect current neighbourhoods and allow some differentiation in the type of housing.

Comments that did not support building heights changes

138 comments

Desire to retain existing

30 comments

The commenters in this section on the whole either stated directly that the existing building heights should be retained or strongly implied this by rejecting the new provision.

The main view commenters put forward, was that having one maximum building height of 14 metres will cause the city scape to be subject to dull uniformity without any differentiation or variety of buildings. Comments were made suggesting that living environments need to be enhanced, which could be achieved with a range of building heights, allowing for distinction between different areas in the city. A suggestion was made that building height rules should be developed based on each area, rather than having a uniform rule for the whole central city. One commenter stated:

I say follow the community desire previously indicated in public consultations and retain the existing 8 metre limits in areas where character exists in the form of one and two storey buildings and give higher height limits in new areas that were not previously residential. That way developers won't ruin streetscapes with buildings unsuitably scaled compared to the existing residential neighbourhoods.

Comments were made regarding SAMs, explaining that sunlight may be blocked if taller buildings were able to be built in these areas. Other commenters made the point that existing neighbourhoods and their character should be protected.

Several comments were made about the desired increased density. One commenter explained that higher density could be efficiently developed within the current 8 metre height zones. Another suggested that there was already enough space in the city centre without having to build taller buildings.

A comment was made describing the proposed single height limit as an over-simplification, and unnecessary.

Desire to retain 11m and 14m February Draft heights

12 comments

A large number of commenters made specific mention of the draft heights proposed by CERA in February 2014 draft showing two heights, 11 and 14 m. They preferred for these heights to be retained.

Impacts on existing neighbourhood character

23 comments

There were a range of comments about the impacts that changing the maximum building heights would have on the character of existing neighbourhoods. Especially in the SAMs, there was feeling that changing the maximum height limits would diminish the feeling and style of these unique areas. Commenters felt strongly about wanting to enhance the character of the areas but were worried that the changes in heights could ruin the existing coherent and pleasant areas, along with the sense of neighbourliness. Comments were made about the proposed changes removing the protection for areas to be in tone and scale with each other. It was also stated that the opportunity for the creation and maintenance of distinctive, diverse and attractive central city communities may be eliminated, resulting in ugly buildings, lost amenity and unhappy residents. This was one comment.

14 metres, plus no requirements for pitched roof, is too high in existing neighbourhoods that consist mainly of one to two (or 2.5) dwellings, with maximum of 8m +3.5m roof line. Given the relatively small sections in areas such as the Victoria Neighbourhood where I live (eg Salisbury St, Conference, Peacock, Beveridge, Gracefield Ave), allowing new dwellings of 14 metres, with provisions for going even higher without even consulting with those who already live there, will make it very unpleasant.

Other commenters raised the point that the height limits should be imposed depending on the area, and not a “one size fits all” approach. They argued that existing buildings had to be taken into account and that there were different needs in different neighbourhoods.

Elimination of neighbourhood consultation concerns

18 comments

A large number of comments were made showing concern that neighbours would not have to be consulted (non-notifiable) when tall buildings are consented. While many simply stated that this just shouldn't happen some views

expressed to support this opinion were along the lines of this being a reduction of rights and that people should have a say when their rights are impacted on:

No requirement for potentially affected neighbours' agreement is quite simply wrong, one mans economic advantage is often anothers disadvantage and this lack will be counter-productive to the aim of central city residential development.

A comment was made suggesting that not allowing residents to have a say in the heights of neighbouring buildings would be a failure to recognise the existing neighbourhoods. Another comment was made stating that this would attack the rights of existing residents and homeowners.

Alternative suggestions

19 comments

Many different points were raised in this section.

A few comments were made suggesting that decisions about the buildings heights be made on a case by case basis or for there to be different rules in different zones. A comment was made stating that existing buildings should be taken into account. Another comment was made regarding SAMs and how the height restrictions should be subject to an urban design panel to ensure the quality and suitability of these areas.

Differing opinions were stated about what specifically the maximum height should be. One commenter stated that 14 metres was too restrictive and that taller buildings should be allowed. Another suggested an 8 metre limit so as not to block sunlight and views. One suggested that the 8 metre height that has been identified, should be limited to a flat maximum height of 11.5 metres. A suggestion was also made to fix the height at 14 metres, but allow a variable of 3.5 metres...

...based on architectural merit, streetscape form and relief. Qualified Architect/Urban Design Panel should efficiently assess over-height and effect. Architectural merit/form is an essential ingredient to the success or failure of all proposed planning objectives.

A comment was made suggesting some allowance for roof style being included, otherwise there could end up being a homogenous mass of flat roofs.

A suggestion was made to enforce height limits around green areas, such as Hagley Park and the Green Frame.

Another suggestion was made to allow roof top features such as gardens or communal spaces so as to accommodate more development on the land available.

One commenter encouraged more flexibility for the developers in order to boost design diversity with roof lines and streetscape. Another suggested a tailored approach to the central city living zone would be more rational.

A suggestion was made to allow for extra height to be achieved at corner sites to:

Accentuate the inner city block structure.

Another suggestion was made to have a maximum of four storeys and then for housing to be interspersed with green space and walking/biking lanes. A suggestion was also made to remove the 30 metre height limit, as it created unfriendly places and little sense of community.

Sunlight concerns

12 comments

The comments in this section refer to the potential blocking of sunlight if taller buildings were built next to smaller ones. Many commenters were concerned about living next to substantially taller buildings, with one commenter explaining that this would not only block the sun light, but also harm the views of surrounding trees and sky. One commenter suggested that this would...

...unfairly affect those who currently live there as well as deter people from moving there.

Dislike market or developer approach

9 comments

Many comments were made in regards to concerns about developers having too much power and the market not being an appropriate mechanism to ensure current and future residents' amenities.

Concerns were raised about developers only wanting to maximise their return without taking the present coherence of neighbourhoods into consideration. A suggestion was made to use urban design assistance to take into consideration the surrounding context.

A few comments were made suggesting that the limited grounds that are to be considered should be removed as that unfairly favoured the developers.

Also the limited grounds to be considered in such applications should be deleted as this skews the hearing unfairly in favour of developers.

Suggestions were made to ensure that there is consideration for the existing buildings that are in risk of being dwarfed by new structures. One commenter went on to say that this would severely diminish the existing value of the property.

Other concerns

27 comments

Other views expressed by a large number of commenters, was that the height limit of 14 metres was too high. Lost amenity, reduction in desirability for families with children, the destruction of any sense of community and pressure put on the continued survival of existing buildings were several reasons given for the opposition to the 14 metre height limit.

Another concern was raised regarding the need for varied heights of buildings. Reasons for this concern included: having one height limit would lead to a less diverse and appropriate city; eliminated opportunities for the creation and/or maintenance of distinctive, diverse and attractive central city residential communities; one size fits all policy is not appropriate; could lead to a bland, monotonous and unattractive city without distinctiveness of character.

A few commenters were wary that developers would have power to exceed heights during consenting as matters that will be considered were limited, but “economic efficiency” must always be considered. It was thought by these commenters that these rules were biased towards developers exceeding limits.

A few comments had a different view, encouraging the limit to be raised in appropriate areas. One commenter suggested that:

Reducing the permissible height to the subject property will reduce the commercial benefits of investing the subject property. The reduced permissible height will result in the property's value reducing and additional difficulty to fund the redevelopment of the property.

One commenter stated that there was confusion about the actual height restrictions.

A commenter referred to the properties on 25, 29 and 35 Cambridge Terrace, arguing that increasing the maximum height limit to 20 metres would be highly desirable for the following reasons: property only two blocks from the new bus exchange so additional density can be justified; 20 metre maximum would generate more accommodation, particularly close to the hospital; a taller height maximum could allow a better view over the Avon River precinct; more likely to include a car park level in the higher building.

General comments regarding building heights changes

9 comments

Some general comments were made about the maximum building height changes.

A few comments were made regarding the need for flexibility when it comes to regulating the building heights. A couple commented on making the city “human-scale” and thus not allowing as many tall buildings. One commenter stated that taller buildings would lead to:

...shady, dank urban living.

However, another comment explained that having all buildings low-rise would be boring, and high-rise buildings can be earthquake-proofed.

One commenter complained about the length of the process of obtaining permits, and that now with the changes in height restrictions, they would have to change their plans again.

A reference was made to Surfers' Paradise, where the commenter suggested that the high-rise development...

...destroyed the outlook and community [...] Horrible big malls and concrete canyons are not conducive to enjoying a city. Keep it human scaled.

Comments regarding specific building heights changes

7 comments

Several comments were made regarding changes to specific properties and the actual wording of the provision.

One comment was made that the 14 metre height maximum in the Avon Loop must be removed.

A few individual commenters stated:

Under Objective 11.10, Built Form and Amenity add to existing paragraph another sentence giving the objective that “Maximum building heights are compatible with the existing predominant uses in each area.”

A comment was made regarding the specific site on the corner of Moorhouse and Hagley Avenues should be subject to an exception of an increased height maximum.

URBAN DESIGN ASSESSMENT

Existing provision: Under the District Plan, where comprehensive development is undertaken (three or more units), it is currently necessary to make an application for consent with respect to urban design.

Proposed provision: Remove this requirement.

Rationale: The urban design standard is proposed to be removed in order to increase the attractiveness of the central city for residential development. It is expected that the market will demand the high quality residential housing that will help make central Christchurch an attractive place to live.

Summary of comments:

Around 97% of comments (237) opposed the removal of the urban design standard. Many aspects of the removal were criticised with detailed, reasoned and passionate arguments. There was rejection of the argument that the market will demand and provide high quality residential housing.

The overriding view was that, unchecked, the market will provide cheap options which maximise short term profits and result in poor quality, ugly buildings and developments. The downstream impact of this would be an unattractive and unhealthy city that would fail to attract residents and deliver on the current potential to create a quality environment.

Many supported retention of the existing provision and some saw this as beneficial for developers, as the Design Panel was considered constructive and improved current projects through their ideas and input. Some drew attention to the poor outcomes that had resulted in the past and drove the setting up of the urban design process.

Some comments stated that the current provisions should be generally tightened and broadened rather than removed. Other alternative approaches, which included an urban design panel, were also proposed.

Around 3% of comments supported the removal. Little detailed discussion was provided by these commenters.

Comments in support of urban design assessment changes

8 comments

Full Support

5 comments

Four of these comments were one word signifying agreement while the other agreed with the removal to “help speed along the development of the city centre”.

General Support

3 comments

There were three comments indicating support but with provisos that there should still be some form of guidelines, with one commenter suggesting these are “materials” guidelines for example, timber detailing, energy star ratings, green buildings. The third commenter agreed but then noted they did not want to see poor quality buildings resulting in future “slums”.

Comments that did not support urban design assessment changes

237 comments

Disagree with rationale – the market will not provide

49 comments

A significant number of comments were made on this topic, both broadly and specifically disagreeing that the market would provide the high quality, attractive housing that the rationale for the change suggests.

Totally disagree. Urban Design is critical and cannot be left to "the market".

It is short-sighted for the CCDU to “expect that the market will demand high quality residential housing that will make central Christchurch an attractive place to live.”

The overarching concern articulated by a significant number of commenters, was that the market and developers should not be “dictating urban design” as motivation is financial and the cheapest options, or those with quick returns were likely to be chosen.

Reliance on 'the market' to ensure 'high quality' housing will be a mistake, one that has been demonstrated repeatedly in previous years with the many dull, uninviting housing projects on the eastern side of the city. The market (meaning investors) will only seek to maximise their

return on capital in the most expedient way, leaving those who reside in the resulting units to live with the often less-than-ideal results.

One commenter acknowledged that not all developers were ignorant to good urban design, but still expressed concern that “smaller or novice developers” or those “operating at the lower end of the market” may not act in the interest of good urban design.

Many commenters expressed concern that leaving urban design to the market would not take into account the community needs, or reflect what the community considers attractive. Similarly, concerns were also expressed around the imbalance of power between the market and the general public with the former not representing the interests of the latter.

We are told that: “The urban design standard is proposed to be removed in order to increase the attractiveness of the central city for residential development”. Does this mean only attractive for developers. What about attractive for residents as promised in the vision?

Requests to “learn” from previous market failings such as leaky buildings, were made by several commenters and a number of specific examples of perceived poor quality areas (Madras and Barbadoes in St Albans, living 3 and 4 zones, the eastern side of the city) were also given as a reason why the rationale was disagreed with.

This is nonsense and the requirement should stay. Without this “The market” will end up suffering what the profit driven developers provide as there won't be enough alternatives. Time and time again this has been shown to be disastrous and Chch deserves much better.

Other, concerns expressed by individual commenters within this topic were that while people might live in an unattractive development, it is detrimental to its surrounds; that ‘good urban design’ is subjective and there will be differing perspectives on what this is; that architects are under pressure by developer employers to design poor buildings that are cheap to build; that the market needs leadership and will not always ‘demand’ good urban design; and that developers need to be held accountable.

The following quote illustrates some of the overall issues raised in this section well.

There must be some regulatory safeguard to prevent the sort of mass-housing developments that we have seen in Auckland and other cities. Presumably 'the market' 'demanded' them too. Without any urban design assessment what will stop unscrupulous developers from saddling Christchurch with a few of them simply because they believe there is a market for cheap and nasty central-city apartments? Even if they are wrong and their developments fail, their mistakes will be a blight on the city centre for decades. Someone must be demanding of each and every proposal for comprehensive development that it is contributing positively to a beautiful and vibrant city centre. It cannot be left up to 'the market'

Disagree with rationale – housing will be poor quality and unattractive

38 Comments

A significant number of comments were made disagreeing with the other aspect of the rationale – that high quality residential housing and an attractive place to live would result from the proposed changes.

This is a serious backward step. There is no way that removing this requirement will make development more attractive.

A significant number of these comments primarily stated that without the existing provision or any clear guidelines, the result would be poorly designed, “cheap and nasty” buildings.

The absence of an urban design panel (since there are essentially no rules) will result in mediocre buildings. I'm in the property investment business so I see them all the time. Without checks and balances one will generally get the lowest grade buildings possible.

Several commenters expressed concern that this could result in potential “slums of the future”.

Removing the design standard will not increase the attractiveness of the inner city for citizens or developers. What it does increase is the likelihood of poor low quality developments which equals future slums not attractive sustainable inner city living.

References to learning from history, past experiences and examples of poor design were made by many commenters. This included several comments about past planning occurrences that resulted in the urban design process in the first place.

Many comments were made about the long-term nature of buildings and thus the potential to impact on their surrounds if they were poor quality. This included impacting on urban character, amenity and quality of life as well as appeal to potential future occupants.

We're building for the long term here, we need QUALITY of public and private realms if we are to have any hope of attracting interesting, young people to our new cbd. While speed of recovery is also important, we must take care not to leave a shoddy legacy of building stock or dubious public spaces - cities who have done this take years to solve such problems, if indeed they ever do.

Related to this, were concerns by a few that a dangerous poor quality development “precedent” could then be created which would have a “spiralling downward effect” for future developments.

The following quote captures the overall concerns in this section well.

I see no prospect that removing the urban design standard will increase the attractiveness of the central city - quite the opposite, in fact. Thousands upon thousands of hours of work by urban design professionals and years of community consultation has gone into creating the current standards and it would callous and counterproductive to throw it all out. Removing this requirement will lead to more cheap and nasty, ugly blocks which lower the attractiveness of the city as a place to live and visit. If you are serious about creating the best small city in the world then you will ditch this proposal.

Disagreement with removal of the existing provision

35 Comments

A significant number of comments were made disagreeing with the removal of the existing provision and strong language was common across a large number of these comments with the removal often being described in various ways as a “very bad idea” or that it was “strongly opposed”.

I disagree strongly with the proposed removal of this provision. Urban design is really important.

This is a really bad idea. Urban design reviews lead to higher quality.

The removal of the existing provision was described by several commenters in various ways as being “a step in the wrong direction”. One commenter noted the “paradoxical” nature of seeking to remove the urban design standard in order to promote the attractiveness of the city, when -

....it is universally recognised that a high standard of urban design is fundamental to achieving desirable urban living environments.

A large number of commenters discussed the value of the existing urban design assessment; that standards and the Urban Design Panel are a form of “quality control” and help ensure high levels of design standards are adhered to and assist in ensuring honesty, accountability and responsibility across the development stages.

Absolutely not. The urban design panel keeps developers 'honest' by asking them appropriate questions and, where necessary, encouraging them to consider their neighbours and the needs of the city as a whole

Several commenters expressed gratefulness for the Urban Design Panel based on experience, noting that they were “professional”, “useful” and provided “generally positive” and “very good design advice”. The presence of the Urban Design Panel was also commented on by a few to have enhanced design and appearance.

I think this is a terrible idea. I have designed multiple, multi unit apartments in the four aces in the last three years, and the Urban Design Panel have been implicitly useful, not only to us, but to the quality of design in the city.

One comment noted that the existing provision essentially provides free advice to developers. Similarly, another commenter stated that the Urban Design Panel educates developers on good design principles.

Concern was expressed by a few commenters that removal of the current provision would result in negative impacts on the city as a whole, neighbourhood characteristics, amenity values, as well as on residents and communities in general.

It was commented by one that delay as a result of the existing provisions is necessary to prevent inappropriate developments and by another, that delay is not a sufficient reason to rid the existing provision. It was also supposed by two commenters that those who are unhappy with the current provision are likely to be those who need to be subjected to the process.

Retain the existing provision

25 comments

A significant number of commenters requested that the existing provision be retained. This was expressed in very simple terms by a large number of commenters, for example:

The Urban Design Panel should be retained.

I support the existing provision

Though, strong language was also used by many commenters in expressing a desire for the existing provision to be retained.

I beg you to retain urban design requirements.

KEEP EXISTING PROVISION!

When providing reason for retaining the existing provision, reference was frequently made to ensuring quality of developments. Reasons for retaining are also captured in more detail in the other discussions in this section.

Inconsistencies identified with removing the existing provision

21 comments

Three main inconsistencies were identified by commenters on the Urban Design Assessment proposal. A large number of these comments drew attention to the historic occurrence of Plan Change 53. These comments primarily noted that this plan change illustrates the negative outcomes experienced with the previous absence of an Urban Design Panel thus should not be set aside lightly.

Dropping the design check without reinstating detailed rules is only implementing half the system. This then leaves the city exposed to the risk of low-quality buildings in the residential living zone. This actually happened under the 1995 City Plan, leading to the Plan Change 53 which set up the urban design process.

The second inconsistency, identified by many was that removing the existing provision would be inconsistent with planning practices in other parts of New Zealand, overseas and good planning practice more generally. A few commenters also make reference to the Urban Design Protocol (2005) to which they state Central Government and the Christchurch City Council are signatories to.

By removing this provision Christchurch will be totally out of step with the other major cities around the country and indeed the world who see the value of good urban design.

It was also observed by one commenter that design professionals are employed to “optimise the planning for Anchor Projects” and questions why the residential design build does not also have this standard. Another inconsistency identified by a several commenters, similar to the one identified above, was that that the design assessments are removed for CCLZ but retained in the Eastern Frame. Concern was expressed that this will result in a double standard. Similarly, it was identified that the Land Use Recovery Plan was applying Urban Design Assessment thus to not do so in the city, would be inconsistent.

The third inconsistency identified also by many commenters, was that the removal of the existing provision was inconsistent with Chapter 6 of the Canterbury Regional Policy Statement which requires residential development to give effect to the principles of good urban design.

We note also that removal of the urban design provisions of the existing plan is inconsistent with Chapter 6 of the Canterbury Regional Council Regional Policy Statement which was included in the Regional Plan by the direction of the Minister of Earthquake Recovery.

Concern about proposed (non-notified) consent process

13 Comments

Concern in this section was expressed by many commenters about residents not being able to make submissions on consent applications and more specifically to the Urban Design Panel. Additionally, consent was advocated to be retained and protection of the right to comment was desired.

I support the existing provision that consent must be applied for and approved by due process (including community/neighbourhood input) before development is undertaken.

Removing such involvement was noted by several to have impacts on existing neighbourhoods, streetscape and character.

Alternatives suggested

23 Comments

Many commenters argued that if anything, the urban design rules should be strengthened. This was phrased in various ways – strengthened, increased powers, stricter rules, more rules and enlarged functions and covering all new developments. A few comments were also made emphasising “enforcement” of rules.

I can't believe CCDU would take such a huge risk as removing any requirements related to urban design standards. If anything, I'd expect the standards to be STRENGTHENED to ensure that we end up with best that can be managed given the obvious financial constraints.

Suggestions were also provided around what the urban design guidelines should include: street, CPTED, building modulation and articulation, layout and location of access, parking, privacy, outlook, environmental efficiency, form, streetscape, design quality ratings, size of windows, north-facing living areas, garaging on south side, stepped dwellings, utilise the tool box for sustainability as discussed by council in 2005 and a “visual consent process and standard”. Two comments were also made that the assessment criteria should be simplified, one suggested this in general, and the other suggested six criteria. One commenter stated the urban design process needed to be robust. Several commenters also suggested variations of a discretionary urban design assessment process. Two commenters suggested where a development was non-complying, an urban design assessment should be discretionary. One of those commenters stated this should be the case even when affected neighbours have given their consent. Two commenters suggested in the case of medium or high density, Council should have discretion to require oversight by a design panel. Another commenter suggested urban design assessment should be required for any developments of six or more units, or where street frontage is more than 20 metres. It was also suggested that urban design assessment be mandatory when adjacent to, or opposite a listed heritage building.

Other singular suggestions were also made. One commenter suggested a master plan for the city to provide an overall vision to assist developers would be useful. Another suggested that the existing provision should not be removed in relation to Special Amenity Area 30. Another commenter stated that so long as recession planes were adhered to, sunlight and privacy retained, extra parks provided and a neutral colour scheme was proposed, the Urban Design Panel was not needed.

Other Concerns

13 Comments

A few comments raised concern about the impacts of the proposed provision on the neighbourhood, neighbours, streetscape, and property values and noted that it was not a reflection of what residents want. Two comments were also concerned that the city would become a place for the wealthy.

Two commenters queried the evidence to show that the existing framework was not working, or was inhibiting the rationale for the proposed provision. It was noted by the Council that the urban design rule does not impose an unreasonable level of additional regulations on new developments and that 99% of Resource Consent Applications were determined within statutory timeframes in 2013/2014.

Concern was also raised about the potential impacts of not having qualitative urban design assessments for social and state housing. Concern about the lack of mention and provision for ecologically sustainable residential development was also raised. One commenter also queried whether there would be a requirement or incentive for building accessible housing.

General comments about Urban Design Assessment

3 comments

The general comments were varied. One commenter stated that neither the existing nor the proposed option would work as the existing has delays and limits possibilities and the proposed reliance on the market will not be

satisfactory. Another commenter noted that council has been too rigid and that good design will come from experience.

Specific Changes

5 comments

Two of the specific changes requested the reinstatement of the “Urban Design Appearance and Amenity” section which was in the February 2014 CERA draft of The Liveable City. Reinstatement of Rule 4.2.7 was also requested, as were the “paragraphs out of the current City Plan (as set up by Plan Change 53)”.

The following amendment was also desired.

ADD new policy under Objective 11.10 11.10.4 Protect the environment through providing for the sustainable design qualities of the Urban Design Protocol and the Ngāi Tahu Subdivision and Development Guidelines - Mahaanui IMP.

SPECIAL AMENITY AREAS

Existing provision: The District Plan identifies a number of Special Amenity Areas and includes specific provisions for them, principally around design, density, setback and height.

Proposed provision: Remove Special Amenity Areas.

Rationale: Both the Christchurch City Council and CERA have reviewed Special Amenity Areas. In both reviews, the organisations noted how much these areas have changed, including as a consequence of the earthquakes, and determined that some rationalisation of the areas was warranted.

The CCC review recommended deleting all but five such areas. The CERA review determined that even in these remaining areas retaining the Special Amenity Area rule framework in its current form is overly complex.

However, where an area has consistent characteristics that help to define or distinguish it, particular controls on setbacks are imposed to maintain those distinguishing features.

Summary of comments:

Around 90% of comments disagreed with the removal of Special Amenity Areas (SAMs). Commenters wanted SAMs retained because of the amenity value they bring to particular residences and neighbourhoods. The consistency of form within particular neighbourhoods leading to distinctive areas and cohesive neighbourhoods was also considered important and valued. There was specific mention made of the five amenity areas that CCC had identified as important, with a significant number of commenters agreeing with their retention. Specific mention was made of the importance of preserving heritage and SAMs were seen as a way of doing this. The use of setbacks to supplement the removal of SAMs was not considered adequate.

Around 10% supported the removal of SAMs. These comments generally stated that SAMs were no longer relevant and Christchurch should look to the future.

Comments in support of special amenity area changes

9 comments

Full support

5 comments

There were several comments that fully supported the removal of Special Amenity Areas (SAMs). One comment stated:

Christchurch is to be a new city and will not progress with arbitrary protection of status quo.

General support

4 comments

Several comments were made generally supporting the changes to remove SAMs. One commenter explained that the SAMs are no longer relevant, while another encouraged neighbourhoods to endorse their own characteristics according to who lives there without being dictated to by a SAM.

Comments that did not support special amenity area changes

78 comments

Retain amenity quality

23 comments

The majority of comments in this section were supportive of SAMs' retention to retain the distinctive and consistent character of those neighbourhoods. Commenters valued the sense of uniqueness, richness and diversity that comes with these areas and were in agreement that the areas should be retained to enhance the sense of community that currently exists there.

These specialty areas provide variety, flare and uniqueness. They can provide respite from an otherwise homogeneous inner city. Why would we throw away what took years of discussion and liaison between residents and planners. These SAMs are an asset and in the years to come will create a different flavour in the various quarters of the inner city.

One comment was made referring to the benefit of open space in the city centre, which could be diminished if developers were allowed to build in the areas without the SAM rules. Retaining the SAMs enables a connection to Christchurch's past was a view expressed by several commenters.

The simplification of the Special Amenity Areas to a few increased setbacks as proposed in "A Liveable City" fails to recognise the more intimate, human scale nature of the streetscapes in these localities. Like urban design quality, once special amenity areas start to be degraded by

ad hoc and piecemeal development, there is a downward spiral. Christchurch has lost so much of what was once an incredible amenity and quality of its central city. It is critical to retain and reinforce what is left of the character of the city.

A comment was also made regarding concern about uncontrolled development taking place if the SAM rules were removed.

The last vestiges of it are critical to retain to reinforce the character of the city. The people and communities of Christchurch have strongly supported retaining the amenity and character of their city, and those last areas which remain should not be allowed to be further degraded.

One commenter stated that they would be less inclined to invest in the city because of the risk that removing standards delivers. They would prefer for SAMs and other design standards to be retained so they can have ongoing confidence in the high quality amenity of the area where they are investing.

If the current proposals noted below are implemented I will not invest in the central city because the risk to the value of my investments will be too great.

The removal of Special Amenity Areas (SAMs) will initiate a demographic homogenisation of the CCLZ. I have seen this occur in other cities where unique areas of interesting dwellings with character and the associated residents have been progressively replaced with the bland, Hamilton being a classic example. Consequently I will lose the opportunity to invest in inner city areas that are interesting and characterful. Such areas attract the most suitable tenants – well educated, interesting people who want to be part of an urban area with style and character. Being actively involved in the property business world I know that there is a propensity for bland developments to be the norm because it is too hard for a developer to resist putting an extra unit on a site, rather than beautify the environment and still make an adequate return on investment. One associate, when proudly showing a group of investors one of his appalling developments, added further insult to our senses by referring to them as “calf stalls”. Consequently not only for me as an investor, who wants quality property to invest in, but also for the poor sods who end up living in the developments, do not proceed with the removal of the SAMs.

Protect cohesive neighbourhoods

17 comments

Retaining SAMs in order to protect the various cohesive neighbourhoods in which they exist was a view expressed by many commenters. One commenter stated:

A liveable central city will be one with a diverse range of neighbourhoods - and this means protecting the character of each as much as possible to provide variety for those who wish to live there to choose from and enjoy.

Several comments mentioned the importance of protecting the local features in neighbourhoods, which would attract people to the areas. Comments were also made about enhancing the uniqueness of these neighbourhoods – characters which are worth preserving and strengthening.

A commenter suggested that consultation regarding SAMs should be done on a case by case basis and also stated that removing the SAMs would:

...destroy community cohesion and spirit.

Another commenter said that taking away the provisions of the SAMs would result in bad design, crowded buildings, poor facilities and loss of amenities. This commenter also stated that the loss of SAMs would:

...destroy the prospect of having long-term residential neighbourhoods as opposed to dormitories for the transient.

A comment was made stating that the areas are prized living zones that work well as they are, and are highly populated districts that sustain attractive, coherent neighbourhoods.

Keep five existing SAMs as proposed by CCC

15 comments

A large number of comments were made regarding keeping the five SAMs that were proposed by the Christchurch City Council. Several comments were made specifically about the CCC, and that they had good reasons for recommending keeping the 5 SAMs.

Some SAMs are passed there use by date and are not really worth the effort but others in particular around heritage buildings /settings are important to be kept to protect the overall character of an area. The CCC approach with 5 SAMs to be kept seems reasonable.

One commenter argued that the CCC was better equipped to make decisions about the SAMs, as they were more closely aligned with the people of the city.

Other comments were made warning of the impacts of removing all of the SAMs. One commenter said that keeping the 5 SAMs was the best way to retain the character, heritage and history of the city. Another said the SAMs were special and distinct, and changes to these would make the city homogeneous.

The prosed 5 remaining SMAs [sic] should remain. They were recommended for good reasons. Reduce the complexity by all means but do not ignore the few things that remain to remind us of our city's heritage.

Preserve heritage

7 comments

A number of comments were made urging the retention of SAMs as they provide links to the past, which will become more and more precious in the future. Commenters described the SAMs as assets, “gems” of early Christchurch and valuable, fragile areas. Reasons given for keeping the SAMs are as follows: they are a rarity that should be reviewed separately; they encourage variety and patches of uniqueness; they have diverse qualities and individuality; they stimulate innovative contextual design which architects appreciate; they appeal to a broad range of demographics from childless professionals to families with growing children. This was one comment.

They actually need protection in order to rebuild and stabilise. These historic districts should be lauded as 'gems' of early Christchurch and described as such. Goodness knows, the city has lost so much of its architectural heritage

Setbacks are not enough

6 comments

There were several comments made about the proposed setbacks not being sufficient. A couple of comments reflected the opinion that having only two metre setbacks could erode the character of some areas, and allow for an unattractive city. One commenter explained:

A special setback requirement is woefully inadequate to protect the areas which retain some distinctive character.

Another comment was made saying that the small setbacks would cause a failure in providing an intimate, human scale central city.

General disagreement

6 comments

Several comments were made which generally didn't support the removal of the SAMs. One commenter suggested the city would become “bland” without the character produced by the SAMs.

Another was concerned about the notification process of those already living in a SAM. The commenter stated:

Affected SAM residents should be notified of these proposed changes and agreement reached. People buy in these areas for a reason and by removing the SAMS you also open it up to unsuitable development as will be allowed by the new lack of rules being proposed in this document.

Other commenters described the SAMs as “a great feature of the central city” and as having “special character” and hence were against the removal of these areas. Another said there would be much to be gained if the SAMs were to be retained.

Alternative control

4 comments

A few comments were made regarding keeping some control of the SAMs, if not full control. One commenter explained that this was important to:

...stop us becoming a tilt slab concrete city.

Another commenter suggested that foregoing all control of SAMs would be a backward step and that maintaining even small pockets of heritage was important.

General comments regarding changes in Special Amenity Areas

12 comments

Several different comments were provided for this section. A few comments were made regarding the notification and inclusion of existing SAM residents in further discussions.

Affected SAM residents should be notified of these proposed changes and agreement reached.

One commenter suggested that the Christchurch City Council should be making the decisions, as they are democratically elected.

A couple of comments were made regarding pedestrian movement, footpaths and wayfinding accessibility, questioning how the changes in SAMs would affect these.

One commenter wrote to complain about preferring to be asked what they wanted instead of having planning done and then being asked for responses afterwards. Another stated:

Instead of planning and then asking, how about asking then planning.

Another commenter stated:

It is interesting that on pages 6 and 9 illustrations use "character" buildings and areas to illustrate desired outcomes

A comment was made regarding their fear of the city becoming dull and homogeneous. Another thought that the reasons for keeping SAMs should be researched further and that future developments should be...

...sympathetic in scale and texture to the existing buildings.

Specific comments regarding changes in Special Amenity Areas

3 comments

A few comments were made pertaining to specific changes that they thought appropriate.

One commenter suggested:

Carry over the existing SAM rules in the City Plan and insert into the Liveable City document to preserve SAMs and recognise neighbourhoods.

Another commenter suggested that the Dorset/Dublin/Park Terrace area should be a SAM, as well as Moa/Ely Street area and parts of Montreal/Gloucester/Worcester Streets.

One commenter referred to specific pages of the proposal:

On page 6 it says "Throughout the central city there will be opportunities for residential development that recognises and is influenced by the local context". We have that already with the SAMs and different heights and I don't think the proposal will do this as well as what we have at present. On page 7 it says "these initiatives will help instil the confidence needed to grow the central city residential population and create vibrant communities, which will in turn support business growth". We are here already and we have and do this, but the proposals give us less protection in having a say in our neighbourhood.

On page 8 it says "These standards will benefit new residents and protect the amenity of those residents who have already made their home in the central city". I disagree that these protect my 'amenity'. How does developments that can go higher, steeper recession planes, not being able to have a say about adjacent developments and not keeping the characteristics of the area I live in, do this? It seems like the opposite to me. I don't get any certainty from this proposal even though balancing this is the primary objective (page 16). I had certainty with Council rules and the SAM.

NON-RESIDENTIAL ACTIVITY

Existing provision: *The District Plan provides for various non-residential activities depending on their location, scale and whether a person who works in the business also lives on the site.*

Proposed provision: *Continue to provide for non-residential activities but on a more restricted basis.*

Rationale: *Restrictions will ensure that non-residential activities do not interfere with residential activities, which are to be the main focus within the zone. They also make it easier to achieve the aims and intentions for the adjacent business zones where such activity is more appropriately located.*

Summary of comments:

Around 60% of comments were in favour of providing for more restricted non-residential activities in residential areas. Many of these comments were general statements of support. The reasons for support included creating a more vibrant community through restricting the non-residential activity rules. Many were in support of non-residential activity which supported the local community and did not negatively impinge on neighbouring residents.

Around 40% of comments opposed the proposed changes. These comments generally stated the view that mixed use was a preferable zoning for a city environment and the mix of businesses and residential activities was complimentary, leading to increased vibrancy and security in the city. Some stated that it was also important to differentiate between central city and suburban living, which were stated to be distinctly different. Some stated that it was important to have services needed by residences located close to where they live.

Comments in support of Non-Residential Activity changes

41 comments

Full support

30 comments

A significant number of comments were made in full agreement of the proposed changes to the non-residential activities provision. Many comments were made simply stating their agreement. Other commenters gave reasons for their support.

A few comments were made saying that restricting the rules about non-residential activities would create a more vibrant community.

Many agreed with having some non-residential activity in the inner city, but only if it were small businesses that were compatible with comfortable and un-intrusive enjoyment as well as with residential activities. Concerns were raised about late night noise from bars and clubs interfering with residents' ability to live comfortably.

A non-residential activity must NEVER interfere with the ability to live comfortably... Noise, smell and obstructive parking will disrupt inner-city living for most.

A couple of commenters specifically referred to non-residential activities occurring in their vicinity. The Salvation Army on the corner of Gracefield Avenue and Salisbury Street, and the Majestic Church on Kilmore Street were both given as examples of larger-scale non-residential activities that were obtrusive to the residential properties around them.

One commenter complained about the process of non-residential activities gaining permission to operate in the inner city:

When a non-residential activity is approved, the next applicant uses the fact that there's already commercial /non-residential premises in the area as an argument that their application should be approved as well. Even though CCC says a precedent is not set by such approval that is not what has happened in reality.

General support

11 comments

A few commenters stated that they agree to some extent with the proposed provisions regarding non-residential activities. The extent to which they don't agree was due to the following reasons: encroachment on safety of neighbouring residents; traffic hazards caused by parking on both sides of the street and the narrowing of roads; deterioration of residential ambience.

A few comments were made referring to what activities could be tolerated in residential zones. Suggestions included dairies, cafes, hairdressers and mechanics, so long as they were in business to service the local neighbouring residential area.

A commenter suggested the no motels, hotels or tourist operations should be considered for being situated in residential zones.

Another comment was made referring to service space needing to be located forward of any part of the building.

A suggestion was made by one commenter that the new rules should only apply to new operations. One commenter made this point, which summed up the views of a number of commenters.

As long as non-residential activities do not negatively impinge on neighbouring residents this should continue to be permitted.

Comments that did not support non-residential activity changes

25 comments

Mixed use preference

19 comments

A significant number of comments were in favour of implementing mixed use zones in the city centre. There were various reasons for this opinion, along with suggestions to improve the situation.

A few commenters agreed that the mixed use zones would be vibrant and buzzing parts of the city, both in the day time and night time. More people day and night also bring vibrancy and safety for these areas. One commenter stated:

I believe that the whole Central City needs to be mixed use with upper level apartments and penthouses, having traveled to Asia and 8 or so countries what I have observed is that the older areas with lots of residential in upper levels and commercial and restaurants on the ground floors, these are the really vibrant buzzing parts of the city bother [sic] during the day and in the evening.

Another point was made by a few commenters who encouraged differentiation from the suburbs with these mixed use zones in the centre. One commenter explained that it brought a point of difference to the centre, making it attractive for people to move there. Another commenter described the changes as creating a “supersized suburbia”.

People should expect noise in the city and bringing a culture of NIMBYism [not in my back yard] from the suburbs will be detrimental.

A few comments were also made about having a convenient distance to retail, movie theatres, restaurants, laundromats, medical facilities, schools and essential services. Many of these commenters went on to explain the positives of not having to have as much focus on cars, and allowing people to access facilities on foot, bicycle or public transport.

The point of living in the inner city is to have access to these activities! Not to remove them! The change here is moving in the wrong direction.

One commenter suggested that having blanket residential zones would lead to more traffic and commuting for work, leisure and sports. A comment was also made regarding blanket zones:

The idea of ‘zones’ such as business, residential and commercial are a nomenclature of the 1950s that needs to go.

Another commenter was cautious that it would be a tricky balance of residential and non-residential properties, but the positives of having mixed use zones far outweighed the negatives. Striking the right balance was important for this commenter:

This is always a tricky balance. I think mixed use should be strongly encouraged as this provides the most live [sic] and safety for a city.

Other suggestions

3 comments

One commenter suggested that more should be included in the proposal about noise and air pollution as well as other pollution. They encouraged having small businesses creating local products for the neighbourhood as it stimulated creativity and innovation as well as community spirit.

Another comment was made regarding healthcare and wellbeing. Easy, preferably walkable links to key destinations were suggested to help foster informal social connection. This commenter opposed the restrictions on health

facilities in the residential area, as they believed there would be an increase in demand for primary health facilities as more people moved to the central city. They suggested that:

The location of health facilities are permitted over a broader area.

Retain existing

3 comments

A few comments generally stated that the controls should remain as they currently are. One commenter went on to explain that they saw no reason to restrict it further and that:

...the zones and the precincts are going to create black holes during different days of the week/times of day. It seems ridiculous.

General comments regarding changes in non-residential activity

8 comments

There were several different topics commented on in this section.

A couple of comments were made regarding sex workers in the inner city. One commenter explained that the presence of sex workers in residential area would not encourage people to move to live in the inner city. Both commenters suggested an area be identified where the workers can “ply their trade”. The comments suggested concern not just for the presence of prostitution, but the...

Minders who sit in their cars throwing RTD cans & McDonald papers out the windows, wacko types who prowl the area with pit bull dogs all nights. We've found knives, clubs and steel bars in convenient hiding places, not to mention faeces on our properties and burglaries are common. If you want to build a lovely new CBD, make provision for the prostitutes early on.

A comment was made encouraging the inner city areas to have green areas, walls and roofs, and also creating a percentage of the inner city which has a tree canopy cover.

One commenter suggested that heritage properties could be affected by such stringent controls, mentioning specifically if there was a sudden increase in modern accommodation available in the central city, these properties may be adversely affected.

Another comment was made:

The CCDU/Government plan should be amended to ensure that all residential areas stay residential and many of these Mixed Use areas return to residential.

Specific comments regarding changes in non-residential activity

3 comments

One comment that referred specifically to the rules set out in the proposal was:

Rule 4a.3.2 (residential coherence) raises potential uncertainty as to its application insofar that 'only those persons who reside permanently on the site can engage in the activity'. This could, for example, preclude any activity where clients or visitors 'engage in the activity'. In contrast, the existing residential coherence rule requires 'at least one person engaged in the activity [to] reside on the site', in which case this uncertainty does not arise.

Another comment was made referring to the properties on 25, 29 and 35 Cambridge Terrace.

Due to the angled street frontage of the subject property orientating towards the boatshed and flood path issues on the subject property restricting residential activities at street level, it would be desirable to activate this ground plane with a retail or commercial office space – such as a florist, café and other uses that will assist in further activating and enhancing people experiencing the recently completed Avon River Precinct works. Minimal alternate uses from residential would be desirable – say 10% of the gross floor area.

A commenter suggested that rule 4.1.5 should be inserted in the Mixed Use Zone rules.

RECESSION PLANES AND SETBACKS

Existing provision: Development must be within different specified recession planes to safeguard the amenity of neighbouring properties (and likewise to protect new development from any future development alongside it).

Proposed provision: Retain this requirement but specify a single recession plane consistent with the least restrictive of the recession planes applying in the existing Living 4 Zones.

In addition (consistent with the existing provision), a setback of 1.8 metres from internal boundaries is required so that the amenity of neighbouring properties is respected while still enabling flexibility in use of the site. There will be specific exemptions to this rule for garage and accessory buildings, allowing flexibility of use while still maintaining appropriate privacy and outlook for neighbouring properties.

The interface between a new development and the street is managed by providing for a minimum setback of 2 metres throughout most of the Living Zone. In Bealey Avenue, Park Terrace, the area surrounding Gloucester Street and the area fronting Gracefield Avenue, the existing buildings have another, generally consistent road setback, which warrants a different setback provision specific to each of those sites. The proposed provisions clearly identify these locations and the setbacks that apply to them.

Rationale: These provisions rationalise a diverse range of setback provisions in the existing Living Zones, many of which are no longer consistent with remaining development.

Summary of comments:

Around 85% of comments opposed the changes to recession planes and setbacks. Many of these commenters were in favour of retaining the existing standards. It was important to these commenters that good direct sunlight was retained into residential buildings. It was also important to many commenters that existing residents were not negatively impacted by loss of sunlight.

While a significant number of comments opposed the setback changes and more suggested that the setbacks were not large enough, some suggested that the setbacks were too large, particularly for narrow sites. Some commenters wanted more variety and site specific setbacks.

Around 15% of comments were in favour of the recession plane and setback changes. Many of these comments made general supportive statements. Some supported the change but also wanted to ensure that good daylight was retained into residential properties. Other generally positive comments in favour of the changes still retained concern for ensuring a range of different design standards were met. Different standards were important to individual commenters.

Comments in support of recession planes and setbacks changes

16 comments

Full support

9 comments

On the whole, these comments made general statements of support for the recession planes and setbacks rules. One commenter said specifically:

Setbacks should be maintained and intrusions should be kept to structures below the 2.3 metre height at the boundary.

General support

7 comments

There were a mix of comments from those who generally agreed with the proposed changes to the provision.

A couple of comments were made regarding ensuring all parts of buildings have good daylight access. This was important to provide liveable and energy-efficient buildings. One commenter explained that a lack of daylight access had very significant impacts on total energy use.

One commenter suggested removing the ability to build any structure, such as a garage, on a residential boundary.

Another commenter was concerned about setbacks being turned into car parks, creating an unattractive element to the street scene and limiting interaction between the property and the street.

For one commenter, it was important that the designs are consistent with good urban design.

One commenter agreed with the changes so long as neighbours were consulted when developments fall outside setbacks and recession planes restrictions.

Another commenter was concerned about:

...lack of ability to prevent excessive overlooking of neighbours, where lines of large windows could face towards the neighbour at upper levels and at a distance of only 4 metres.

Comments that did not support recession planes and setbacks

93 comments

Retain existing

25 comments

A significant number of comments were made supporting the existing regulations with regards to recession planes and setbacks. Many comments simply stated that the existing regulations should be retained.

Several commenters brought up the point that existing setbacks protect residents' sunlight, but with the proposed changes, this sunlight was at risk of being blocked. Reasons given for not wanting their sun blocked included: wish to retain quality of living with current sunlight; ability to grow fruit and vegetables; ability to utilise natural resources; importance of sun to wellbeing. One commenter stated:

Sunlight is the most precious asset of a house.

Several comments were also made regarding the safeguarding of residential amenity by keeping the existing regulations. Commenters suggested that it is essential to look after existing residents, the character of the buildings needs to be retained and the current owners of the properties should be respected. One commenter explained:

This would have a major impact in preserving residential amenity for existing residents.

Another reason given to keep existing recession planes and setbacks rules was because...

...the existing slopes are already pretty steep, and very few buildings in the L4 zones even approach the current height and recession plane limits so there is plenty of scope for higher density even under 11 m height and Diagram D recession planes.

A couple of comments were made in reference to the proposed rules being too specific, and hence difficult for designers to work with.

A couple of commenters mentioned the undesirable closeness of buildings if these rules were to be changed. One commenter suggested that garages shouldn't be allowed to be built hard up against a neighbouring property.

Another comment was made suggesting keeping the existing regulations, but having the ability to negotiate changes if required.

One commenter suggested that if the existing provision wasn't kept, then they would prefer having more restrictive requirements as opposed to less restrictive.

Impact on sun and privacy

18 comments

A significant number of comments were made opposing the changes in recession planes and setbacks regulations because they will adversely affect residents' sunlight and privacy.

Many comments were made specifically referring to sunlight being blocked. One commenter stated:

... I oppose the recession plane proposals. "Blue sky amenity" is an established feature in many existing residential areas with the Living City Zone. Changes in height restrictions within the zone are going to allow a lot less light and sun to track around houses and bathe them with sun.

Other commenters explained that sunlight was an important aspect of amenity, and the reduction that may occur with the change in regulations would not be acceptable for good living standards. One commenter brought up energy efficiency, and how restricting residents' sunlight could have adverse effects on this.

Several comments were also made about privacy of residents. One commenter explained:

This concerns me. We Kiwis value our privacy. I'm considering living in the central city within the next few years but I don't want to be looking into my neighbour's home! Keep it as is!!

A comment was made regarding referring to developers who will tend to be concerned only with their own project, rather than take into consideration how their project will impact other properties and residents.

Suggestions

15 comments

There were various suggestions made in regards to the recession planes and setbacks regulations.

Several suggestions were made regarding sunlight exposure. Comments suggested that rules should ensure as much sunlight is captured as possible, as sun is essential to people's wellbeing. One commenter explained:

Consideration should be given to the development of standards to maximise the sunlight to dwellings so buildings can take advantage of solar gain and improve energy efficiency.

A few comments were made suggesting that 2 metre setbacks are not enough and that changing the regulation to having at least 2 metres setback would result in a more consistently attractive street frontage. One comment was made disagreeing with this point and suggesting that for narrow sites, setbacks should be 1 metre. The commenter explained that...

...when you have a long narrow site it is really hard to design something which has a good relationship with the road and maintain a private area at the back.

One commenter suggested having 1 or 1.5 metre recession planes, explaining that it will...

...save CCC policing very minor non-compliances and also save the construction industry a massive amount of money having to, for instance, make garage eaves tuck under recession planes at internal boundaries.

A couple of comments were made suggesting that proposals should be required to be assessed by an urban design panel, rather than having restrictive rules. Commenters explained that this would provide more flexibility, which is key in ensuring good design.

One comment was made suggesting that the side boundary setbacks for garages be 0 metres.

Another commented that regulations for recession planes should be in the "mid to most restrictive not the least".

One comment suggested following the Queenstown recession plane rule from.

The Queenstown Lakes District Council has provision within the recession plane rules of it's plan which allows for a small amount of non-compliance. From memory they permit up to 6 square metres of new building to project though the recession plane. This figure is probably too high if the new recession planes proposed for the Central City Living Zone is the least restrictive of the current L4 recession planes, but even 1 or 1.5 square metres would be a very good idea as this will save CCC policing very minor non compliances and also save the construction industry a massive amount of money having to, for instance, make garage eaves tuck under recession planes at internal boundaries (not to mention the ugly parapets with the corner cut off we are used to.)

It would be wise to restrict acceptable small non-compliances to a certain height above ground level (say 5M). I suggest CCC Planners look at what Lakes District has done, as it is very workable and must save them a lot of time not having to sweat the small stuff, without creating negative effects for property owners adjacent to new residential development. This idea could usefully be extended to the other living zones outside the Central City Living Zone.

Existing neighbour concerns & consultation

11 comments

Several concerns were raised regarding the lack of consultation of neighbours that is required to occur with developments being undertaken in neighbourhoods. Comments were made suggesting that existing residents should be favoured over potential developers. Several commenters explained that the existing rights of current residents should be taken into consideration and respected. One commenter explained that in doing this, it would safeguard the amenity of existing residential properties.

A comment was made which summed up the issue.

No changes should be made to recession planes or setbacks which will negatively impact on the neighbours of new developments. The rights of residents currently occupying properties must be respected before the rights of future developments. Neighbours of proposed developments must have the right to be notified and the ability to object to neighbouring developments which would negatively impact on their on properties.

Detail related to gaining consent from neighbours and how it should be achieved was provided by one commenter.

The Council opposes non written approval or limited notification requirements for rules 4a.2.3 Building Height, 4a.2.5 Sunlight and outlook for neighbours, 4a.2.7 Separation from neighbours.

The notification statement at the end of 4a.1 should be amended so that rules that directly protect the amenity of adjoining neighbours (4a.2.3 Building Height, 4a.2.5 Sunlight and outlook for neighbours, 4a.2.7 Separation from neighbours) require the affected adjoining land owners written approval or limited notification to that affected adjoining landowner where that written approval has not been obtained.

Specific recession plane comments

11 comments

Most of the comments were made regarding the reduction of sunlight that may occur with the changes in recession planes requirements, which, according to one commenter, would not be acceptable for good living standards. Another commenter suggested that this rule was one of the most important for protecting the sunlight and outlook for neighbours.

One commenter explained that to them, the recession plane regulations were more significant than the building height regulations.

Another commenter explained that they would be slow to buy in the city if it meant someone could build next door to them and block out the sun.

One commenter encourages more flexibility in the regulations:

A one type fixes all will create a monster that will benefit the big developers and neutralise the ability of the individual home owner to have any input.

...the limited grounds to be considered in such applications should be deleted as this favours developers and not the residents.

A comment was made specifically in regards to the provision rules, suggesting that the notification statement at the end of 4a.1 be amended to include rules that directly protect the amenity of adjoining neighbours.

Specific setback comments

5 comments

One comment was made suggesting that the 2 metre setback rule was too general, and that in medium-density areas this should not be required. Another commenter suggested that the amount of setback, if any, should be determined in relation to the building's location.

Another comment was made describing the proposed setback as "very tiny". They went on to explain:

It will rob the city of its spacious feel.

One commenter argued that simplifying the range of setbacks provided benefit only to administration. They explained that different setbacks determined the diversity of the inner city suburbs and thus should remain.

A comment was made raising concern for a monotonous streetscape if the changes were to occur. The commenter explained:

It would be better to consider the area between building and street as a semi-public/semi private transition space. Setbacks also depend on orientation. It would be better to state what a setback has to achieve between two properties and between public and private environments and assess the design proposals on how they achieve the overall aim instead of relying on a set distance. (One doesn't fit all!!)

Other concerns

8 comments

One concern raised by a few commenters was that flexibility was needed, and that this change in the provision would be too broad, not allowing for individual circumstances. One commenter suggested using more logical thinking to ensure sensible design.

I think a touch of flexibility in the interpretation is required so that a sensible design can be made to work if the noncompliance is minor Some logical thinking needs to be exercised. Often I have had the situation where staff have agreed with me on projects but the damn rules get in

the way of what is a good design, where a small compromise would keep the integrity of a design with minimal impact. There are dozens of designs that are hashed together resulting in illogical buildings just because they are dictated by the damn rules

A few comments were made about being cautious of developers who would opt for more cost-effective/practical approaches to building, which may result in them encroaching on boundaries and recession planes.

A concern was raised about privacy regarding the placement of windows and balconies. The commenter suggested urban design assessment accompany plans for buildings in these cases.

One comment was made concerned about how the safety and visibility for pedestrians would be managed.

General comments regarding changes in recession planes and setbacks 2 comments

One comment was made explaining that this change in provision would look after the existing residents.

Another comment was made:

Variation is the key to an interesting city – most of these changes are really quite short-sighted and will not result in designs that are special, unique, inviting or liveable.

Specific comments regarding changes in recession planes and setbacks 9 comments

Several comments referred to the specific wording of one of the proposed regulations. Each comment had a point similar to the following:

[At the] top of page 24, change "apply recession plane containment angle diagram E to the Central City Living Zone" to read "apply recession plane containment angle diagram D ..."

Another comment was made specifically referring to making exceptions for properties such as on Chester Street East.

For 90 - 96 Chester St East, a setback of 4.5 metres was required as part of the consents in line with the existing setbacks for 86 and 88, 98 and 100. Along this part of Chester Street East, the set back is 4.5 metres or greater.

A comment was made specifically referring to the proposal's appendix:

The appendix needs to be updated to remove reference to the L4A, B, and C Zones and to show a single recession plane circle for the proposed central city living zone. If the proposed 14m height limit is retained following feedback, then the most logical circle is 'diagram E' which currently applies to the L4A & B zones over 11m in height.

OUTDOOR LIVING SPACE

Existing provision: *The District Plan specifies minimum standards for individual and shared open space per unit to ensure a high-quality living environment.*

Proposed provision: *Retain but amend these minimum standards to increase the flexibility for design and make it easier to apply them.*

Rationale: *This proposal is consistent with research indicating that having adequate private and shared space is a critical component in deciding whether to live in the central city for all potential residents.*

Summary of comments:

Around 65% of comments opposed the changes to the outdoor living space provisions or proposed alternatives. The most common response was in favour of the retention of the existing provisions to ensure that open space was retained. More were concerned about the retention of private space than public space. A small number of commenters stated that from their experience shared space didn't work well. A few commenters stated that the proposal needed more detail and others stated that there was a need for flexibility within requirements.

Around 35% of comments were in favour of the proposed changes to outdoor living space. The vast majority of these comments provided general support for the provisions without providing substantial comment to explain their support.

Comments in support of outdoor living space changes

27 comments

Full support

25 comments

A significant number of comments were made in full agreement of the proposed changes to the non-residential activities provision. A large number of comments simply stated agreement.

A couple of commenters agreed outdoor living should be maximised for more humane living conditions but didn't want balcony areas that overlook existing properties, with a commenter stating it must be designed to a high standard.

One commenter said they supported;

"...the reduction of minimum outdoor living space as a way of encouraging design flexibility and enabling better use of shared open space."

One commenter supported the inclusion of the provision to assess resource consents on the extent a reduction in outdoor space will impact on the retention of mature on-site vegetation or adversely affect the spaciousness of the surrounding areas.

General support

2 comments

One commenter provided general support for ensuring there is adequate outdoor space and the methods for calculating minimum levels, provided there is some control to ensure it is useable space. They also commented that the provision may lead to a lack in the variety of dwelling types.

The other commenter stated support for the reduction in minimum outdoor living space from 30m² to 24m² but did not support reduction of minimum outdoor private areas from 12m² to 8m².

Comments that did not support outdoor living space changes

51 comments

Retain existing

15 comments

Many commenters supported retaining the existing minimum outdoor space requirements and not changing them to give people less space. The main reason given for this was to protect open space areas. Other reasons were that: the theory behind it is inadequate; concerns about the outcomes of low minimum standards, design shouldn't be compromised and that not enough detail has been provided.

One commenter said:

The proposed provision is old fashioned. All leading international designers recommend cultivation of public space. This is what creates places of interaction and a vibrant inner city. Keep the existing provision.

One commenter stated that the impact on developers of needing to put a certain number of units in to make a project viable and also comply with space requirements, may have unforeseen consequence of reducing the size and comfort of apartments.

A couple of commenters suggested the requirement to have 50% of the outdoor space across a site to be at ground level was not always possible and that reconsideration of this rule will provide for designs that are more innovative and provide efficient utilisation of space, such as generous balcony options.

Impact on private space

10 comments

Many commenters suggested private space is important in the Central City and that further restrictions should be avoided. Reasoning for this was that private space is essential for life in the city and that private outdoor areas need to be a practical size.

One commenter said:

We like having our own private outdoor yard where we can have a garden, eat meals outside, enjoy the outdoors without going out in public. Also if we had kids, they could play outside unsupervised while we were doing other things like cooking meals etc, rather than play on the drive or street or be taken to a park.

A few commenters expressed concern about the size of private outdoor space of 1.5m if provided by a balcony, that the dimension is too small and would only be used to have aesthetic impact, not as a functional space.

Impact on shared space

10 comments

Several commenters stated that shared space can become a problem because no one takes ownership of the area and it can become an unattractive, underutilised and dangerous space that could adversely affect neighbouring properties. As summarised by one commenter:

Communal, privately managed space in urban environments are almost always under-maintained, underused, and a waste of space. Often they degenerate into eyesores or dangerous spaces.

A few commenters stated shared space is needed but that it must be fit for purpose and welcoming to all inner city residents. One commenter suggested shared spaces could be used for a community garden. Another stated that urban design panel consideration would increase the quality of shared space, otherwise it could be inappropriate.

Suggestions

12 comments

A large number of different points were made in this section.

Individual commenters suggested: each development needs to have access to a common courtyard that can accommodate 50% of the residents so that a healthy community can be developed; without a vibrant street life the outdoor space will need to be larger; examples are needed to show what increasing flexibility means; balcony living should not overlook existing properties; long thin sections could be stepped so that upstairs units can have roof gardens and patios looking towards the street; changes should be negotiated between affected parties; standards should only be applicable to areas not in close proximity to public green spaces; amendments to ideas around communal outdoor space would be nice; incentives to include accessibility for all within designs should be considered and that provisions need a rethink as it could be left to the market if a site coverage rule is introduced.

Flexibility comments

4 comments

A couple of commenters mentioned the importance of considering public space in the central city for all potential residents.

A comment was made stating the minimums must apply but should be applied with relative flexibility.

Another comment was made:

People should be allowed to have courtyards if they choose to do so and rules can't be too restrictive.

Proposal is unclear

3 comments

A few comments stated that there was insufficient detail in the proposals.

Another comment was made wanting to know how the provision will increase design standards.

General comments regarding changes in outdoor living space

5 comments

One comment was made emphasising that there needs to be a way to preserve outdoor amenity without compromising the medium density housing that is required.

A comment was also made in relation to the size of the units – if they are too small they will not appeal to residents. Likewise, convenient parking must be provided.

Another comment was made which stated:

Follow the proposed provision with the ability to review and refine rules based on feedbacks and evidence. CHC is a unique location and situation, be inventive/creative.

Specific comments regarding changes in outdoor living spaces

2 comments

One commenter made a recommendation that for clarity the words “At least” be added to 4a. 2.4(v) to read “At least 50% of the outdoor living space required...”

Another comment was made;

The outdoor living space rule 4a.2.4 works well for townhouse typologies. The removal of plot ratio controls and a blanket height limit of 14m suggests that the typical anticipated typology is apartment blocks. If you have 3 or 4 storey apartments, and each unit is expected to have large balconies, then it is inherently impossible to locate 50% at ground level and still provide complying amounts of balconies to upper level units. It is therefore recommended that either the rule package differentiates between 2 storey townhouses and multi-level apartments (preferred outcome), or the 24m/ unit and 50% at ground level requirement is reduced. Otherwise the anticipated housing typology (multi-level apartments) inherently can't comply with the rule package.

RESIDENTIAL SITE DENSITY

Existing provision: *The District Plan specifies the maximum density of development for residential activities.*

Proposed provision: *Remove this provision.*

Rationale: *Density is already controlled through the collective application of other requirements (landscaping, outdoor space, boundary setbacks, recession planes, etc.).*

Summary of comments:

Around 65% of commenters were generally opposed to the new provisions. The most common alternative approach was to retain the status quo. The outcome that commenters are concerned with is cramped living areas with low amenity resulting in slums in the future. Commenters wanted enough space to remain on sites for outdoor living, trees and stormwater run-off. Some commenters disagreed with the rationale and thought that other provisions would not compensate for a site density rule.

Some felt that the rules would be swung too far in favour of developers who could build what they wanted. There was also comment about the need for other facilities to be provided if densities increased, such as schools, shops and car parks. Some felt that local impacted communities should be consulted.

Around 35% of comments were in favour of the proposed changes. The support for the change was quite general. For those who provided specific discussion of their views it was important to them that amenity standards were still maintained, so it was important that other checks remained in place such as enforcement of recession planes and setbacks. For some, a design panel overview would ensure for them that minimum quality standards are being met.

Comments in support of residential site density changes

28 comments

Full support

14 comments

A large number of commenters stated that they supported this change in the residential site density provision. A couple of commenters went on to explain that they agreed with increasing the density as it was more environmentally responsible in the long term, and that the control mechanisms were more valuable for quality of space assessment.

General support

14 comments

Many comments were made expressing general support for the change in regulation, but with some stipulations.

A couple of commenters agreed so long as the maximum building heights were reduced to 11 metres.

A couple of comments were made referring to letting good design allow for increased density. One commenter suggested working with architects to ensure good density increases, while another suggested introducing design controls to...

...respond to market and allow for inventive and interesting design.

One commenter agreed so long as car parking was increased to match the increase in residents and visitors to sites.

Another commenter stipulated that the increased density area should be restricted to the four Avenues.

A few comments were made suggesting making a provision for minimum density. One commenter suggested this be...

...between 3 and 4 storeys high, which will give a solid density on a people scale.

Several comments were made agreeing generally with the changes in the provision, but only if design quality controls were put in place. One commenter explained:

Dense housing can work but it needs to be very cleverly and carefully designed. It can be a social and urban disaster if not properly developed.

Another commenter suggested that setbacks and recession planes needed to be enforced. Another suggested that there should be minimum space standards to ensure living areas do not end up cramped.

Comments that did not support residential site density changes

53 comments

Retain provision

16 comments

Several comments were made generally agreeing that the current provision should be retained with regard to residential site density.

Several comments explained that the current density requirements worked well and did not need to be changed. One commenter suggested letting the city evolve organically rather than to...

...cram more people together with likely noise, security and behaviour issues.

Concerns were raised over the potential overdevelopment of properties, with one commenter explaining:

Removing this could unnecessarily create very dense pockets which are out of character with the city at large.

Other commenters were also concerned about developers' interests being protected over residents'. One commenter was worried that the proposed changes in the provision would...

...potentially allow developers to build very high density housing without the facilities to make this liveable (such as schools, shops, car parking, etc.).

A couple of comments were made supporting the existing provision with reasons of preserving amenity in the inner city centre. One commenter explained that they didn't want tall, ugly buildings, while another stated:

Watering these [rules] down will result in poor sardine cans.

Concern about resulting quality

14 comments

A large number of concerns were raised about the quality of developments if the changes to the provision were to be made. A few commenters described the results as "slums", which would be unattractive and likely to cause social problems.

We like our neighbourhood and don't want it ghettoised with high density housing that is just used as temporary housing for people as it has been poorly thought out.

Another concern was with regard to overdevelopment. Several comments were made suggesting the requirements remain as they are, otherwise there may be an insufficient amount of space for greenery, tree planting and stormwater drainage, for example. One commenter suggested there needed to be controls to allow for a sufficient balance between buildings and outdoor space.

One commenter advised against the provision change as they believed it would create dense pockets in the city, which would be out of character with the rest of the city at large. Another commenter stated that site density controls are vital to healthy living and thus must remain.

A couple of comments were made saying that they preferred attractiveness in the city as opposed to high density living.

Two commenters made references to apartments in Auckland being like "shoe boxes" and were concerned that this could happen in Christchurch if there were to be no controls on density.

Concern about developer control

7 comments

Many comments were made regarding developers having too much control if the proposed changes in provision were to take place. Each of these commenters agreed that developers shouldn't be given more control as they are out to make money and that they will make the most cash by allowing more space to be built on in a denser way. One commenter stated that the...

...greed of developers should not be permitted to turn Christchurch into high density slums.

Another commented:

Developers will simply push more for their money irrespective of green space and privacy and sun.

One commenter was concerned that the developers wouldn't build enough facilities, such as schools, shops and car parks, to keep up with the increased density of the inner city properties.

Disagree with rationale

5 comments

A couple of comments mentioned that the other controls (building height, recession planes, setbacks) wouldn't provide sufficient control in all cases. One commenter thought that density wouldn't be able to be controlled adequately. Another commenter preferred the retention of the current site coverage rule, as they believed it would help simplify the outdoor living space rule, that it was easy to understand and that it ensures a good balance between built and open space. They also suggested that...

...problems could arise with the proposed provisions, where communal space is provided indoors.

One commenter thought that more factors needed to be considered other than landscaping, outdoor space and setbacks. Another commented that the other controls could easily be overcome by developers who claim their projects are cost effective.

Other concerns

5 comments

Various different concerns were raised by several commenters.

One commenter was concerned that the change was far too simplistic.

Another stated that the removal of the provision was not practical, as it is the Christchurch City Council who provides the services. They were concerned that if there was no limit to density then the Council could over-supply or under-supply.

One commenter commented that green spaces are important in residential developments.

Another commenter was adamant that there is a need to control density specifically in some areas, referring to the areas fronting onto the Arts Centre and Rolleston Avenue.

Another view was raised about low income families and the way rates are calculated for high density units. The commenter also suggested that the low cost source of energy and fast low cost internet would enable many people to work from home.

Neighbourhood consultation concerns

4 comments

Several comments were provided regarding the community being consulted about developments by which they will be affected. One commenter explained that the change in provision...

...removes the ability of people to have some say in what they want and need in their neighbourhood and puts it in the hand of corporations that are out to make money and don't have a vested interest in the area.

Suggestions

2 comments

One commenter suggested that there be a site coverage rule introduced as a safeguard...

...to ensure that there is sufficient balance between buildings and outdoor space to ensure the residential areas are not overdeveloped and there is space for greenery and particularly tree planting and for stormwater drainage.

Another commenter disagreed with further density intensification. They proposed instead that...

...the Council should cease to allow prime residential inner city land to be taken up by non-residential development. For example, about 4000m² at the corner of Salisbury and Colombo Streets was given over to the Salvation Army to establish their regional headquarters. Not only was a large block of housing land lost, but the adjacent neighbourhood will be harmed/compromised by the existence of the Army's activities in the areas. A second example is the application by the Majestic Church to convert 7000m² of L4C land to non-residential use. If allowed, this formerly priceless residential site will be lost.

General comments regarding changes in residential site density

7 comments

Several general comments were made either stating no opinion, no comment or that they didn't understand the changes in the provision.

One comment referred to low density living being more expensive than high density living. Another stated that:

Quite dense inner city developments can be very liveable.

Another comment was made suggesting that the city centre should be more dense, and that...

Christchurch needs to get out of the individual house + lawn format, and offer more intermediate options (apartments, lofts, i.e., properties that require less space).

TRAVELLERS' ACCOMMODATION

Existing provision: *The Living 5 Zone within the central city provides for travellers' accommodation to a high standard compatible with residential amenities.*

Proposed provision: *Split the Peterborough Living 5 (travellers' accommodation) area into two areas: a smaller Peterborough area and a new Montreal area. The balance of the existing Living 5 area will be rezoned to the new Central City Living Zone.*

Rationale: *The rezoning reflects the pre-earthquake extent of travellers' accommodation in this area.*

Summary of comments:

Around 50% of comments were in favour of this proposal. Comments on the whole were general with limited discussion of reasoning.

Around 50% of comments opposed or suggested amendments to the proposed changes. The most common concern was that residential neighbours needed to be appropriately consulted to ensure their concerns are appropriately dealt with and their quality of life is not unacceptably impacted by these activities. A few commenters were in favour of retaining the existing provisions. Two specific comments requested specific consideration of their accommodation sites. A couple of commenters were in favour of travellers' accommodation being dispersed throughout the residential parts of the city.

Comments in support of travellers' accommodation changes

21 comments

Full support

12 comments

All of the comments in this section supported the proposal by either stating agreement or simply suggesting it seems reasonable.

One commenter provided specific support to the zoning of the Holiday Inn at the Avon site and that the Central City Living Zone provisions apply to activities that are not defined as travellers' accommodation.

General support

9 comments

Several commenters expressed support for the proposed changes to the Living 5 zone, suggesting that it is a logical location and the provisions are appropriate.

A few commenters discussed specific developments in the area in relation to how residential and commercial development can be catered for in the L5 zone. For example:

I would prefer to have residential architecture on the site immediately west of the existing of the Hotel Montreal building.

One commenter supported the proposal but suggested discretion should be allowed and that urban design panel advice is key to ensuring that the overall impact on the neighbourhood is considered.

Comments that did not support travellers' accommodation changes

20 comments

Control impacts

10 comments

Several commenters raised concerns regarding the need to ensure that neighbours that are affected by these changes are consulted with and catered for in a fair way. A few were concerned about the interaction of traveller's accommodation areas with residential zones and that there is a need for controls to ensure the quality of life for residents is maintained. As one commenter said:

Cater for Christchurch residents first!! The LCP doesn't protect existing neighbourhoods or privacy than protecting existing neighbourhoods. The main changes attack the rights of existing residents and homeowners by specifically blocking neighbours from being consulted.

One commenter stated they were not too sure about the proposed change in the Peterborough area as it has its own characteristics and would be a shame to break that down.

Support existing

5 comments

A few commenters expressed support for retaining the existing zoning. Reasons provided were that traveller accommodation should not be provided in the Avon Loop and that mixed use zones are better because prescriptive zoning runs counter to a city naturally developing.

Two commenters extensively discussed their objection to changing the zoning of specific sites (363 Montreal Street and the “Star and Garter” site on the boundary of the Living 5 Avon zone) from Living 5 to Central City Living. The reasons given for this were that the change in zoning does not reflect that the areas have a history of being non-residential and that the Living 5 zone would provide for the expected future development of traveller’s accommodation on the sites.

Suggestions

3 comments

Two commenters suggested there is a need for low end affordable traveller’s accommodation to ensure different budgets are catered for.

One commenter suggested traveller’s accommodation should be spread over the city and incorporated into the character of areas, similar to areas in Melbourne and San Francisco.

Oppose commercial use of land

2 comments

Both of the comments in this section opposed the proposal related to the provision of travellers accommodation in the Avon Loop area. One objected that there are potential benefits from the commercial use of land which will border the red zone (potentially a park). The other commenter suggested that allowing a hotel in the Avon Loop contravenes the objectives as the plan allows for a much large scale than previous travellers accommodation, which will dominate the environment. Their main concern was that it will not accommodate the need for more residential properties so people can permanently reside there and start to rebuild the community in the area, they said:

Any commercial development that occupies over a third of the area will dominate the neighbourhood and will destroy any hope of a residential feel.

General comments regarding changes in travellers’ accommodation 12 comments

Individual commenters suggested the motivation for splitting the zone was not made clear and that they had a concern that the changes will facilitate the construction of inappropriate and small apartments which is not what a more sustainable Christchurch needs.

One commenter discussed the rules that apply to the Living 5 (Avon) zone; that controlled activity status should be maintained in relation to external appearance (5.2.8), continuous building length rules 5.2.9 and 5.2.10 should be deleted as they have been in the Central City Living Zone, and the rule 5.4.4 regarding access restriction should also be deleted.

Specific comments regarding changes in travellers’ accommodation 5 comments

Comments in this section related to sites that the commenters suggest are retained or included the Living 5 Zone and amendments to the provisions of that zone. In relation to land surrounding The George Hotel a commenter suggests this land should be zoned Living 5 to provide flexibility to expand.

Another commenter suggested the site of the Latimer Hotel to be zoned Living 5 to reflect historic and existing activities on the site and provide for ongoing hotel management activities.

Specific zone rules that were discussed included development standard 5.2.8 relating to the ability of neighbours to comment on external appearance and urban design which was supported by one commenter and the provisions relating to site density and site coverage (5.2.1 and 5.4.1), with one commenter suggesting site coverage is a more relevant control.

NOTIFICATION OF RESOURCE CONSENT APPLICATIONS

Existing provision: For a number of rules, applications for resource consent do not require the written consent of other people and are non-notified.

Proposed provision: In circumstances where residential development cannot comply with the Development Standards, require consent but limit the assessment of the consent application to the assessment matters clearly set out within the zone provisions. Where an application for consent is required, it will not be notified, relying instead on Christchurch City Council to give appropriate consideration to the amenity of third parties when it considers the specified assessment matters.

Rationale: This process provides for timely decisions, whether the application is approved or declined.

Summary of comments:

Around 95% of comments did not support the changes to notification of Resource Consent Applications. A very large number of commenters rejected outright the removal of this right. There was a large number of detailed reasons provided why this is thought to be a bad thing.

Commenters wanted to be able to protect the amenity of their home and area from poor standard developments being built next door and in their neighbourhood. Some stated that this would put their investment at risk and would deter others from investing because they could not be confident that their investment would not be undermined by other poor standard developments being constructed in the future.

Some stated that this rule is skewed far too much in favour of new developments and this would not result in the quality and type of community that is being strived for.

Other commenters stated that they believed CCC is not well placed to consider the impacts of developments on affected parties because they don't have enough intimate knowledge of areas and communities to understand the impacts and be appropriately informed to make good decisions.

Some were opposed to the downgrading of standards (height, recession plan and separation from neighbours) from *critical* to *development* standards as this means they don't trigger notification.

Around 5% of comments were in favour of the (non) notification of resource consent application provision. Some simply stated that they agreed with the proposal while a few stated that they agreed but the Council needs to be rigorous in their assessment.

Comments in support of notification of resource consent applications changes

9 comments

General support

5 comments

Several comments were provided generally agreeing with the proposed provision, but with some stipulations.

A couple of comments agreed but referred to the onus being on the Council to...

...provide a sufficiently rigorous assessment of proposals and their merits.

One commenter went on to explain that the Council would need to exercise discretion to avoid malicious or unnecessary delays.

Another commenter explained that they were in general agreement of the provision, but only with cases where there was little or no impact on adjoining properties.

One commenter suggested cases go in front of an urban design panel to make sure potential effects on others are considered.

Full support

4 comments

Each of the four comments stated simple agreement with the change in notification of resource consent applications.

Comments that did not support notification of resource consent applications changes 158 comments

Disagree with removal – entitled to be notified/democratic right 80 comments

There was a very significant number of comments regarding the rights of residents to be able to have a say in what is happening in their community. Commenters strongly opposed the change in provision as they greatly valued their right to have input in the development of their immediate surroundings. A commenter referred specifically to the Council perhaps not taking everything into account, and thus (landowners) requiring the right to speak up about these matters.

This provision will steam-roll over existing landowners rights-right to comment, even their right to know what is going on. It is a violation of existing property owners' rights and ultimately will backfire in potential buyers being wary of purchasing a home in the city area. It is undemocratic and down-right wrong.

A large number of comments were made regarding people being able to protect the amenity of their homes, with the expectation that developers will not take into account the interests of current residents. Several commenters called for the ability to protect their assets. One commenter made the point that if a development is a good one, then there would be no issues concerning its occurrence.

The process does provide a safeguard for people's rights if they consider they are genuinely affected or impacted by proposed developments. This seems to be a clear denial of fundamental citizen's rights and a breach of the Resource Management Act itself.

A large number of comments were made about citizens' democratic rights, and that without the regulated notification of resource consent applications, these rights would be violated. Commenters agreed that developers would be favoured and able to push boundaries, causing harm to existing residents in the central city. Residents' sense of community and their wellbeing would be damaged if the removal of notification about resource consents were to occur.

Notification is vital and democratic.

A large number of comments were made about residents having the right to be informed about the developments occurring in their community. Without such a right, the certainty of being able to object to developments that negatively affect residents would be removed, which could discourage people from investing in properties in the city centre.

That is outrageous, and will benefit developers while greatly reducing certainty among existing residents about what might suddenly happen next to them. This is not just tilting the playing field in favour of developers, it's only allowing one team and the referee to even run onto the pitch. The other team (the neighbours) have to wait in the dressing room to find out who won the match.

Several commenters stated that this will result in increased risk for investment in the city. This is a result of not having control over what may be built next to your property which may devalue it and the surrounding neighbourhood.

Clearly this is an outrageous removal of neighbouring property owners' rights to protect their asset. I will now not be investing in the inner city as I will most likely have my property devalued by an intrusive development, possibly even one outside the development standards outlined in the CCRP. Clearly the risk to my investment will be too great.

A comment was made suggesting that there should be a robust consultation process, otherwise the feeling of community would be lost. Another stated if residents were adversely affected, then compensation for them could be negotiated between them and the developer.

Concern about developer control 18 comments

A significant number of commenters raised the concern that with the proposed changes in the notification of resource consent applications, developers would be favoured far too much over the existing residents, those that

will contribute to developing the community that is desired. Commenters argued that this did not guarantee a fair outcome for residents as the power to negotiate would be very unbalanced.

No notification of development proposals, no opportunity for affected parties to object – these provisions are far too far towards the interests of developers as against existing residents, the very people who will contribute to the residential diversity which is desired. Developers by the necessity of maximising profits tend to provide a series of similar living spaces, which will inevitable be inhabited by members of a particular market segment.

One commenter explained that while the change would encourage timely, however bad decisions to be made. Most of these comments agreed that the interests of developers should be second to those of the local residents, rather than what they see is proposed, which is the opposite of this.

Several comments were made regarding developers being driven by profit maximisation. Comments were made explaining that it would be easy for developers to argue cost effectiveness of their developments. One commenter explained that developers...

...try to make the most cash by allowing more space to be built on in a denser way.

Several commenters discussed the limited matters that could be considered and they felt that this was also skewed in favour of developers.

The limited grounds to be considered in such applications should also be deleted as this skews the hearing unfairly in favour of developers. Different means could be sought to allow for "timely decisions" without removing existing residents' property rights

Concern was expressed about residents not being able to protect the amenity of their properties, with regard to sunlight and outdoor spaces.

Council not appropriate for the task

16 comments

Many comments were made regarding the Council not being able to be fully aware of the impacts that developments would have on the local community. Commenters explained that this would result in poor outcomes for communities, and that a lack of certainty would create a deterrent factor for the uptake of residential offerings in the central city. They felt that residents were better placed to inform decisions than potentially ill-informed or inexperienced CCC employees.

Leaving the decisions up to some random CCC employee or committee with little practical knowledge of the areas in question will result in poor outcomes for communities and the uncertainty will create a deterrent factor for the uptake of residential offerings in the central city.

One commenter explained that we...

...can't assume that CCC staff can possible [sic] be familiar enough with all areas to know how a particular departure from the Standards might affect those who live or work in that area.

A few commenters made the point that they did not trust the Council to act in the best interests of the community when considering a deviation from the plan. One commenter suggested the Council would approve plans that were convenient for them.

References were made to past decisions, with one commenter suggesting that the Council hadn't thoroughly vetted an application in a particular case. Another comment was made arguing that it was important to have a way for neighbourhoods to have input in decisions and be informed.

A few comments suggested that an urban design panel be used to make sure potential effects on the public were independently considered so as to provide effective solutions.

Disagree with development and critical standards or criteria

15 comments

The main point brought up in these comments was that it is unfair to limit the criteria that can be considered when evaluating applications for resource consent. Many comments were made warning against limiting the issues that neighbours could raise as negative effects of developments. One commenter stated.

This is particularly galling when Building Height used to be a Critical Standard, and has apparently been downgraded to a Development Standard to let it not trigger notification. Height, recession planes and separation from neighbours are vital and neighbours must be notified.

Several of these commenters also explained that the economic efficiency criteria in particular would tilt the playing field, as cost effectiveness was easy enough for developers to argue. One commenter described this.

Almost every section of the CCDU/Government plan that appears to set standards and guidelines for residential building contains catch-all avoidance clauses

These include the provision

Resource consents

In circumstances where residential development cannot comply with the above standards, resource consent will be required.

However, the assessment of the consent application will be limited to the assessment matters clearly set out in the zone provisions. P16 CCDU/Government plan

And clear statements in other sections e.g. 4a.2.5 P23 Resource consent para b

SUNLIGHT AND OUTLOOK FOR NEIGHBOURS

Resource consent applications for non-compliance with this Rule will only be assessed against the following matters:

(b) The extent to which the intrusion is necessary to enable more efficient, cost effective and/or practical use of the remainder of the site [or...]

To argue cost effectiveness is easy for a developer and affected are specifically excluded from having any input or being able to challenge the developer's input. This kind of phrase is repeated in many sections, totally under-cutting the strength of any provisions that might limit the pursuit of the total self-interest of any developer, be it one of the favoured firms CCDU/Government have selected to do the Green Frame residential building or other developers let loose across all other current and potential residential areas.

Similar weakening clauses occur in the Resource Consent Applications sections as follows: 4a.2.1 b; P22: 4a.2.2 b P22; 4a.2.3.c P23 and 4a.2.5.b P23.

There is a similar "developer get-out-of-jail-free" clause in 4a.1.4

A couple of commenters explained that in their opinion the plan seems to incorrectly assume that development standards are of less concern to anyone but the occupants of the new buildings.

Another couple of commenters thought that this change in provision was seriously flawed and didn't deal with many concerns of current and potential residents. One commenter stated:

The rules relating to; maximum permitted height limits, recession plans, separation from neighbours, should remain Critical Standards and neighbours and others affected by proposed breaches should have the chance to object to such breaches. A minimal sense of security around the quality of people's home environments will be totally lacking and will be seen as such.

Retain provision

[11 comments](#)

A large number of comments were made requesting the retention of the existing provision regarding resource consent notifications. A commenter warned that changing this provision would penalise property owners. One commenter suggested that the public should be engaged in the redevelopment of the city, while another explained that in retaining the existing provision it would ensure existing owners are given a voice.

A couple of comments were made regarding the Council making decisions. One commenter warned against changing the provision because:

As proposed, the change will place the Council in the middle of a neighbour versus neighbour conflict when these matters should be resolved prior to making an application.

Another commenter claimed that they did not trust the Council to make a decision on their behalf. They explained that there needed to be a more democratic way of making decisions.

Other concerns

18 comments

Various other concerns were raised regarding the removal of the notification of resource consent applications.

A few commenters were concerned that existing residents wouldn't have their interests represented accurately when resource consent applications are being considered. Commenters explained that there was no need to throw away checks just to speed things up and that to have a healthy living city, the people need to be involved and feel fully part of the process.

One commenter described an alternative approach to speed things up and include affected residents:

Clearly the interests of existing residents are to be sacrificed for speed of development. The very least that can be done to improve this state of affairs without returning to the well-known slowness of normal procedures would be for the rules to provide that the consenting authority must employ, at a salary commensurate with the great importance of the position, a person whose sole task is to gather the views of affected residents, within a specified time-frame, and present them to the consenting authority – and for the rules to further require that the consenting authority must consider the residents' views as so presented and properly minute its consideration and its decisions in relation to those views.

A couple of comments were made regarding concerns that in order to get people to purchase properties in the inner city, there needed to be certainty about what could be built in adjacent sites. Without this certainty, the commenters warned that there could be fewer people likely to invest in the city centre, and that this would be detrimental to the success of many projects.

A couple of concerns were also raised about the limited grounds that would be considered in applications, as these unfairly favour developers.

A couple of comments were made about timely decisions not being as important as making good decisions. One commenter explained that...

...there'd be less consideration and more poor decisions being made.

Another comment went on to say that this provision...

...will backfire and cause new residents to worry about what can be developed around them. This will knock their confidence and they will turn away.

This commenter went on to explain that the current system works well as it is, giving both current and new residents confidence that their living environment will be relatively protected.

Individual commenters made the points that: close living quarters in the centre city require greater respect for neighbours; surprise about how little data or concrete information was needed to prove there was no other suitable locations for specific developments; removing notifications could allow for buildings to be built which lack cohesion and character with the broader city appearance; changing this provision may work in the short term, but could leave the city with environmental problems in the future.

General comments regarding changes in notification of resource consent applications

4 comments

One commenter explained:

CERA seems to prefer dictatorship over the oh-so-messy democracy, but people vote with their dollars and their feet.

Another commenter suggested that it should be the removal of the requirement to obtain the building's tenants' consents rather than the proposed changes.

Specific comments regarding to changes in notification of resource consent applications

15 comments

There were comments made specifically referring to the proposed provision.

Several commenters agreed:

Delete the eleven complete sections starting "Resource consent applications for non-compliance with this Rule will only be assessed against the following matters ..." and all the sub-clauses underneath. This applies to all sections from 4a.2.1 to 4a.2.11 inclusive on pages 22 - 26. / 2.

Most of these commenters also agreed with:

Delete the sentence before 4a.2 at the top of p22: "Resource consent applications in relation to non-compliance with any Development standards shall not be publicly or limited notified".

A couple of comments stated:

We request the removal in 4a.1.4 of the final statement, "resource consent applications in relation to non-compliance with any development standards shall not be publicly or limited notified".

One commenter stated:

The group request that the phrase relating to 'practical and cost-effective use of the site' be removed as an assessment criteria for resource consent applications for non-compliance, in all cases. Or at least have it balanced by a statement requiring quality and suitably to context as a matter that must be considered in cases of non-compliance.

Another commenter said:

The wording "The extent to which XXXX is necessary to enable more efficient, cost effective and/or practical use of the site, or the long term protection of significant trees or natural features on the site" is amended. This wording appears in the following clauses: 1. 4a.2.3 Building Height 2. 4a.2.5 Sunlight and Outlook for Neighbours 3. 4a.2.6 Street Scene and Accessways 4. 4a.2.7 Separation from Neighbours

The wording should be altered to read:

"The extent to which XXXX is necessary to enable more efficient, cost effective and/or practical use of the site in relation to the urban design assessment, or

The extent to which XXXX is necessary to the long term protection of significant trees or natural features on the site"

OTHER SPECIFIC STANDARDS

A number of commenters providing discussion on the changes made to specific clauses in relation to the current District Plan and how they fit in with phase 1 of the District Plan review. Christchurch City Council commented on each of the standards. These comments are generally discussed in this section. The technical detail can be seen in the original comments which have been identified to planners.

Development Standards 2.2-2.4 (parking and loading)

9 comments

Several commenters raised concerns relating to the amount of cycle parking provided for under development standard 2.4.4 cycle parking. All suggested increasing the availability of cycle parking to encourage cycling.

The provision of good quality cycling infrastructure is an important factor in encouraging people to cycle. By having a high number of cycle spaces available, people will be encouraged to bike in the Central City.

Two commenters raised concerns relating to development standard 2.4.3 Parking for people with disabilities. Both suggested that on-street parking and spaces at large scale residential developments are needed to provide for people with disabilities and the aging population, particularly where public transport is ineffective.

One commenter suggested additions to 2.4.7, 2.3.3, 2.4.14 to provide for emergency service facilities.

Critical Standards 4a.3

7 comments

One commenter provided support for clauses 4a.3.1 Scale of activities and 4a.3.2 as they are aimed at containing and preventing non-residential activities in the Central City.

Another commenter suggested that the proposed non-complying activity status for breaching rules 4a.3.1-4 is too onerous and should be changed to discretionary activity status.

Additions to the critical standards to provide water supply for firefighting and to exempt emergency services from specific provisions relating to 4a.3.1 scale of activities, 4a.3.3 hours of operation, 4a.3.4 traffic operation, 4a.3.5 storage of heavy vehicles.

Development Standards 4a.2

26 comments

4a.2.1 Minimum Unit Size

4 comments

A few commenters opposed the rule, suggesting it is too small or should rather be a building consent matter.

One commenter provided general support for the rule.

4a.2.2 Ground Floor Habitable Space

6 comments

All comments on this standard were in opposition, suggesting that the rule may not achieve the intention to improve interaction with the street. Reasons provided were that there is no requirement for windows onto the street, the rule does not work for layered apartments and that the 30% is too onerous.

A few commenters suggested that this rule should not apply to multiple level buildings or should only apply to stand alone housing.

4a.2.11 Acoustic Insulation

5 comments

A mixture of comments were provided.

Several commenters supported the standard. Reasons provided were that it means businesses will not be impacted by reverse sensitivity issues and is a practical response to providing residential living in the Central City.

One commenter opposed the standard due to the additional costs involved in construction and that the standard does not apply in other zones that may be equally impacted by noise.

Other

11 comments

Two commenters discussed 4a.2.10 landscaping and tree planting, one suggesting that the existing rule is a better provision and the other suggesting an addition to require one native tree per 250m³.

One commenter suggested additions to 4a.2.3 and 4a.2.10 to provide exemptions for emergency service activities.

Another commenter suggested an additional standard of 4a.2.12 to deal with onsite water retention and reuse, and a standard that provides for a mixture of unit sizes and affordable housing.

Individual commenters provided comment on other development standards as listed below:

4a.2.4 outdoor living space- that leeway should be given for multiple level buildings.

4a.2.9 fences and screening- support but clause c should not have an exception for service or outdoor space

Built Form/Amenity and the Role of CCLZ

12 comments

Several commenters suggested amendments to object 11.9.1 and related policies. These included: to recognise and facilitate the recovery of existing inner city communities; amend to provide for emergency service facilities; to provide for acoustic insulation standards (insulation to provide reverse sensitivity protection for residential units); to include explicit reference to affordable housing in the Central City and to provide for protection of amenity values for all occupiers either existing or future; .

A few commenters discussed Objective 11.10. One supported the objective but recommend changing 'accessibility' to 'safety' to ensure consistency with other plans. Two opposed in part as the objective is not supported by its policies and that new policy to recognise and provide for Ngai Tahu values is needed.

Rebuilding can also impact on issues of significance to Ngāi Tahu, affecting their relationship with ancestral lands, water, sites, wāhi tapu and other taonga. In particular, good urban design will contribute to vibrant and renewed centres and help support wider wellbeing objectives such as quality of life, economic vitality and crime reduction.

One commenter wished to add: additional bullet point under Objective 11.10 g) provide for environmentally sustainable urban design, technologies and infrastructure; provisions in development standards for water conservation, solar energy, grey water recycling, sustainable stormwater and wastewater treatment systems, alternative heating.

One commenter expressed general support for objective 11.2.

Activity Standards 4a.1

2 comments

The commenter suggested emergency service facilities should be included under permitted activity status (4a.1.1)

Living 5 rules

2 comments

Christchurch City Council provided specific suggestions on living zone rules, including: site density; sunlight and outlook for neighbours; street scene; separation from neighbours; external appearance; building heights.

OTHER AND OVERVIEW COMMENTS FROM COMMENTERS

While a number of the topics covered below have been discussed, sometimes numerous times, in previous sections. The discussions below are from general, sometimes *summary* comments from commenters. Other topics have not previously been discussed in the body of the report, these include: environment and sustainability; housing and rent affordability; transport (apart from related to parking).

Concerns about limited consultation

25 comments

A significant number of comments were made regarding residents' rights to be consulted when there is the possibility that they will be affected by neighbouring developments. Concern was raised about decisions affecting current residents being made outside of a democratic process. Commenters argued that this removes the say of the residents, resulting in their rights being eroded to allow poor quality developments at the expense of a vibrant community. It was suggested that this undermines and ignores the needs and views of the local residents.

The current Residents should be given the same recognition and opportunity to have input in any proposed developments in their immediate neighbourhood in the proposed changes as the Developers of any new high density buildings.

A few commenters raised concern about having a lack of consultation would give more power to developers, who may not take the interests of residents into account.

Concern about methods to achieve vision

19 comments

A significant number of commenters raised concerns that the changes in existing rules to speed up development processes would be adverse to the desires of the community and would not achieve the vision.

The pretty stuff at the front has many great ideas that acknowledge the past and the present and the future of the central city. It presents a great deal of diversity and hope. Lots of people from diverse backgrounds and interests.

The detail does not support that vision - it appears that a lot of the detail is allowing a less creative future cityscape based more on economic costings and profits than on aesthetic amenity.

One commenter suggested that the changes would promote a quick fix, but that it was likely to have long term detrimental effects on the central city living environment. Commenters suggested that it was important to facilitate residential development, it should not be at the expense of good urban design.

A deep understanding of the implications of changing the rules and extensive testing (including worst case scenarios) is necessary to understand what is likely to result... Much greater consideration and consultation on these changes is needed

Comments were made about it being imperative that the Council has greater control over site layout, building form and appearance than what the provisions would provide.

The proposed changes remove a huge amount of planning power from the council. Historians are likely to look back and see a tragically missed opportunity to create a truly aesthetically pleasing central city area.

One commenter was not convinced that there was sufficient substance within the proposals.

Another commenter suggested considering a phased strategy that works towards a long term goal of dense urban living. They explained that this would be more palatable and could be adjusted as lessons were learnt.

A suggestion was made to introduce minimum unalterable values against which all intended development should be measured, rather than having less regulations for developers to adhere to.

Some considered the market and the timing of change and thought that the wrong approach was being followed for the current circumstances.

It is understood that there is a housing shortage currently in Christchurch so the desire to create good conditions for development makes sense. However the idea that the market will provide high quality design when the market is itself not functioning because of a supply shortage doesn't make sense and will damage the city. It is in exactly this situation that smart, quick and

effective design standards are needed. An urban design panel is a critical part of this. Otherwise we risk the construction of many potentially damaging apartments in a short time that will take decades to recover from. Please rethink this aspect of the new chapter, its not very logical.

Urban design concerns

19 comments

One overall concern raised was that the desired diversity of the city centre could be at risk if urban design rules are relaxed. Commenters reasoned that a wide mix of people and building styles should be included in the centre to reflect Christchurch's modern contemporary society. One commenter explained that without diversity people won't be willing to live in the city. One commenter was concerned that:

Many of the proposed changes may strip out any form of recognition (or ambition to achieve) diversity in the urban environment.

Another point raised by several commenters was that changes in the urban design provision would lead to lower quality buildings. One commenter saw the changes as a desperate attempt to attract developers to build in the centre. A couple of commenters made the point that although the changes would speed up developments, the risks associated with this were not worth it, and that the quality of the built form is more important. This was a concern expressed by a number of commenters:

I'm concerned the changes will facilitate the construction of really tall, cheap, ugly, small apartments, which is about the opposite of what is needed for a sustainable Christchurch.

Developer concerns

18 comments

Developers having too much weighted in their favour has been a concern in previous sections of this report. These concerns were also expressed generally and are included within this section.

A significant number of commenters expressed the concern that the plan is tailored for developers and not people that want to live in the Central City and resembles a *developer's charter* to do whatever they like. As stated by one commenter:

It removes the say of residents and puts everything, with reduced restrictions, in the hands of developers and CCC. It would be a very sad day most likely to leading to the destruction of the character and diversity that Christchurch has.

Several commenters suggested that developers will build to minimum standards as they are concerned with profit and not creating a liveable city with thriving communities.

The proposal is for a developer led housing solution with little design or environmental standards, and no right of objection from neighbours. Most Developers are concerned with making money and not with the public good, that's what the council and government is for.

A few commenters suggested residents are being ignored in the process.

Other concerns raised by commenters about the plan include: that it is an attempt to attract developers to build, the market hasn't delivered in the past and that it limited opportunity for good design. One commenter expressed their assessment of the situation like this.

Really disappointed with the almost total focus on developers, the failure to acknowledge the work the CCC has done in setting up the design standards and the stupidity in thinking that developers will build higher quality without checks and balances. This is completely out of touch with current residents thinking in regards to diversity and equality. It will not bring neighbourhoods together, rather it is divisive and removes rights for people to be heard. When your living in high density you need to think very carefully about how it all fits together, poor design will lead to unlivable and dysfunctional neighbourhoods and decrease the unique and special character of areas. We will end up with a homogenous and ugly city not a vibrant, thoughtful considered one.

Environment and sustainability

17 comments

A significant number of comments were made regarding the environment and sustainability of the city. Some commenters were disappointed with the lack of environmental goals included in the Chapter, with one commenter

explaining that this shows a lack of commitment to the value shared by the community. One commenter urged the provision to include means of developing the brand of “The Garden City”. Another commenter suggested that:

Sustainability as a general principle should be the driving force and should be specifically identified and applied throughout the document.

There were various suggestions made to enhance the environment and sustainability of the city. These included: inclusion of provisions to encourage green building practices; inclusion of provisions requiring new homes to meet environmental performance standards; implementation of measures to enable a change within a few years to a non-fossil fuel economy; allowance of photovoltaic panels being a requirement to reduce heating bills; recycling of white water; existing trees only removed if they are hazardous, dead, diseased or dying; encouragement of hedges instead of concrete, block or wooden fences; provision for the collection and storage of 20,000 litres of stormwater for non-potable purposes; CCDU to create a goal for the percentage of green cover that should be achieved; use of sustainable materials; inclusion of green space and parks; allotments and community gardens.

This point was made about being consistency with environmental standards.

It would be good to see provisions in the draft residential chapter which encourage green building practices. HPC understands that the Council, in its District Plan Review, is proposing to introduce environmental performance standards for new homes and to include the ability for homes to be adapted for different life stages. ...The draft should be amended to ensure that any such changes introduced by the Council will also apply to the central city living zone. It would be undesirable to have a lesser standard in the inner city and this would work against the goal of the Recovery Plan to deliver a more sustainable city.

Community

5 comments

Several comments were made suggesting that a sense of community is very important and should be considered more. The commenters made the points that there should be significant guidance on where diverse communities will be stimulated; there is a need for intimate, walkable places with distinctive character and strong, inclusive communities; rules need to be made on how residential neighbourhoods should be shaped to provide for the needs of diverse communities.

Housing and rent affordability

5 comments

A few comments were made suggesting a provision be included in the District Plan for affordable housing within the city centre. A commenter explained that this would contribute to the...

...creation of sustainable communities by encouraging a mixture of social demographics to the city centre.

One commenter suggested having a control on rents. They explained that even with no city or amenities, rents are through the roof. Having such high rents in the city...

...makes no sense and will have people leaving Christchurch in droves.

One commenter specifically refers to the need to help the homeless, mentioning that they have seen people living in tents and cars in the city.

Transport

4 comments

Several comments were made in support of good public transport and a bike and walking friendly city. One commenter stated that good public transport is essential to any modern city that wants to make itself more liveable. Another commenter suggested there be a focus on making the central city a more pedestrian friendly environment. A commenter stated:

To bring life to a city you must have that buzz of people milling around and interacting on the street.

Suggestions

16 comments

A suggestion was made to make art, culture and design integral to the city development, by incentivising design/art/technological/business enterprise hubs and business incubation units where designer, artists and entrepreneurs can work and interact.

Another suggestion was made to have more clear information and easy public transport links to tramps, by providing affordable bus and train links throughout New Zealand.

A couple of commenters made the suggestion to reduce development contributions so as to allow for more affordable developments, particularly within the four avenues. A commenter suggested a rebate for development contributions. The commenter reasoned that this would assist in keeping central city dwellings competitive with the surrounding neighbourhoods. Another commenter suggested that the rebate for development contributions would be better replaced with a contribution based on the true cost of service provision.

Having two living zones was suggested by two commenters – one that continues to protect existing residents who have lived in long established, cohesive, inner-city neighbourhoods, and another where a large number of buildings have been demolished and there are few existing neighbours.

A suggestion was made to have...

...greater engagement with the design professional whose skill and creativity will ultimately shape the central city. The local architectural community in particular needs to be given a stronger voice.

A commenter suggested that the Council needs to ensure they do not get into large amounts of debt for buildings such as the stadium and restoring the Town Hall.

A suggestion was made to return land to the original property owners that was taken from those in the Eastern Frame which is not going to be used as part of the park but instead used as commercial or residential development.

Other suggestions were: get the Breathe site underway as an example of good development; not to rush and to remember that decisions are being made for future generations; develop a Master Plan to get 20,000 people living in the central city; show how 'non-regulatory' approaches can support residential development; include the intensification targets from the Regional Policy Statement.

General disagreement

24 comments

A large number of commenters generally opposed the majority of the plan provisions and direction that is being taken. There was an underlying comment from several that while the objectives are supported, the means that are proposed are not agreed with. One commenter summed this sentiment up like this:

The objective is supported, but the proposed means are crude, short-sighted and not respectful of the quality city redevelopment sought.

... those making substantial redevelopment investments in the area, are alarmed at the proposed changes in that they will likely encourage low- cost, low quality high density re-development that will devalue the neighbourhood from that which many are working toward. Interests do not support that assessment should be focussed on enabling "more efficient, cost-effective and or practical use of the site". We ask that in every instance this be balanced with an assessment matter seeking high quality design respectful of the context.

A few commenters suggested that CERA should be leaving the decisions to local authorities.

A few commenters regarded the proposed changes as unnecessary or unhelpful in creating the desired certainty around development. One commenter said:

Overall we see these amendments to existing rules as unnecessary, indeed a backward step that will impede rather than facilitate the aspirations expressed.

Other reasons suggested for general disagree of the plan were: that it does not promote a liveable city; it is short sighted; unhelpful to vibrant redevelopment of the area; has some bad ideas, and nowhere in the plan does the welfare and quality of life of inner city residents get a high priority.

Nowhere does this plan suggest that the welfare and quality of life of the people who would live in the inner city should have a high priority as the plans allow dense, extremely tall buildings, minimal space and light, with no possibility of appropriate car and transport access

It even seeks to limit the options for services and retail that inner city residents will need, in favour a few current "high-end" and specialist retailers.

It is clear that the whole of the plan is about total deregulation of the housing and development sectors within Central Christchurch, perhaps as a model for future deregulation on a national basis.

General Support

17 comments

Many commenters supported the overall vision of the plan, in particular the goal to increase the residential population in the Central City. Reasons provided for this support are that there will be more residents providing protection for amenity, improved amenity and varied neighbourhoods. This is summarised by the comment:

Our community supports the overall goals of the Christchurch Central Recovery Plan., i.e. more inner city residents; higher density; simpler rules, more happy residents, protecting amenity for existing residents, and protecting and creating varied attractive neighbourhoods.

Several commenters suggested they support that the rules have been simplified.

Other reasons for the general support of commenters included: that good design will make Christchurch; the unified CCLZ is a good concept; limiting non-residential activity; protecting and creating varied neighbourhoods; that changes should be pushed through as soon as possible, and that it is good to see rule provisions that are designed to complement other zones.

Specific

4 comments

Several comments specific to the proposal were made.

One commenter stated:

ADD new standard: The incorporation cultural monitors and use of cultural monitors on all sites of significance to Ngāi Tahu manawhenua. Documentation, recording and correct Tikanga to be followed in relation to any sites where a likelihood of discovery of items of significance to Ngāi Tahu Manawhenua is possible. In addition compliance with the Historic Places Act and the requirement for an archaeological authority. Any accidental discovery of wahi taonga and kōiwi must be carried out in accordance with Appendix 3 of the Mahaanui IMP Appendix 3; Accidental Discovery Protocol.

Another commenter suggested:

The proposed changes be redrafted so that the CCDU at least recognises "Traditional central city living" residents who have rights under the existing CCC City Plan and their proposed changes submitted to CCDU. The proposed changes should reflect the needs of ALL residents and their communities.

A suggestion was made to have a bullet point in the blue box on page six of the draft – "including accessible for everyone".

Many specific changes in the provision were referred to in the submission from the Christchurch City Council. It is recommended that this submission be read in full, hence specific points will not be referred to in this report.

Other

24 comments

A comment made the point that Christchurch is a rural support town. They predict that the turnover in the centre will be high as people...

...outgrow the novelty of inner-city-as-an-island life.

One commenter suggested bringing back Centennial Pool, but not building a new covered sports arena. Another commenter recommended replacement of a number of services in Eastern Christchurch, such as a gymnasium, swimming pool and a pub. This commenter wished for these services to be within walking distance, reasoning that...

...you play where you live.

A commenter warned not to assume future residents will be carless and hence garaging facilities are important. Another commenter suggested that adequate shared storage space be allowed for within developments.

One comment was made suggesting that the 14 metre building height maximum be removed in the Avon Loop red zone, as they were a previous owner of land there and didn't think it was fair to be "...forced off [their] land... by

bullying CERA threats of loss of services, loss of insurance, loss of land value, loss of accessibility... simple for building to be allowed back into this area”.

One comment was made thanking CERA for the opportunity to comment on the provisions. They looked forward to seeing the plans eventuate, noting that Cantabrians seemed to not be as ready as Wellingtonians or Aucklanders to embrace inner city living.

A comment was made noting that no reference was made to essential state supplied resources, such as primary schools and social services.

A suggestion was made to try to attract owner-occupiers and very long-term tenants as opposed to casual tenants as these will only be accepted by those under thirty.

A commenter made the point that the proposed changes to the District Plan removed the ability of the Council to vet applications for Crime Prevention through Environmental Design best practice.

Another commenter recommended the continued use of the Integrated Recovery Plan to ensure a comprehensive review of residential areas in the city. This commenter went on to explain that commitment to good urban design principles would ensure that the physical environment is attractive and accessible to residents.

A comment was made in regards to there being a current shortage of 1-2 bedroom units, according to the Urban Development Strategy, and that this should be the primary housing provided in the central city.

A commenter suggested the wealth of knowledge that the elders in the city have to offer isn't being fully utilised. They wished to keep the collective experience of the aged population with their “sage wisdom” to be integrated with the independent-minded youth's ideas. They thought there is an opportunity to foster this in the city through joint residential developments where there is symbiotic meetings between older and younger people.

A comment was made asking whether the “bottom lines” in points 1 and 2 of page 16 had been tested to ensure that these will in fact result in good development. They also mention that it is unclear within the Plan how design principles have been incorporated and that the current wording of the rules does not appear to provide a liveable, safe city.

A commenter was concerned about a spiritual facility becoming a non-complying activity in the Central City Living Zone. They believed that a spiritual facility is an integral part of a community fabric and that spiritual facilities should be provided for as a permitted activity.

One commenter went into detail about how the cohesiveness of the inner city could be damaged by motor vehicle traffic passing through the area. They stated that:

“Roadways and traffic can act as physical and psychological barriers to contact particularly where roads bearing high levels of traffic cut through housing areas, limiting or disrupting interpersonal networks and reducing social contact. The impact is greater on those who have limited access to the range of transport options, including older people, the unemployed, those with young children and those with disabilities.”

They explained the adverse effects of air pollutants from motor vehicles, and that a fewer number of vehicles in the central city would be more congenial and healthy for pedestrians and those who work in the centre.

A comment was made suggesting that the proposed changes in the planning regime would counteract the benefits of the Council's previous Plan Change 53 which has been observed to result in the quality of housing improving.

A commenter claimed that there was a lack of Ngai Tahu values in the introductory pages of the plan. They also commented that there was a lack of recognition and incorporation of cultural landscapes.

A comment was made regarding the changes in provisions having impact on the operations of the NZ Fire Service, in particular the provision of sufficient water supply and the physical access for fire appliances.

There were many references and one-off suggestions made in the Christchurch City Council comment. It is recommended that this comments is read in full, rather than being extensively replicated here.